

Privacy Policy/ Personal Identity Information (PII) Policy Expat-Links@

Expat-Links@ supports employees of companies and other organizations who move to the Netherlands. In doing so, it processes personal identifiable information and data.

Expat-Links@ recognizes its need to maintain the confidentiality of Personal Identity Information (PII) and understands that such information is unique to each individual. The PII covered by this policy may come from various types of individuals performing tasks on behalf of the company and includes employees, applicants, independent contractors and any PII maintained on its customer base. The scope of this policy is intended to be comprehensive and will include company requirements for the security and protection of such information throughout the company and its approved vendors both on and off work premises. Departments named in this policy have delegated authority for developing and implementing procedural guidance for ensuring that their departmental responsibilities under this policy are communicated and enforced. Expat-Links@ processes personal data with due care and in accordance with the law.

1. Departments

Data controller: the data controller who is responsible for the processing of personal data is the employer/ the company, as the company sets the purpose of data processing.

Processor: the processor is responsible for the correct application of the data according to the purpose as set by the data controller. Expat-Links@ is the processor.

Vendors: Individual(s) or companies that have been approved by the Contracts Department as a recipient of organizational PII and from which the Contracts Department has received certification of their data protection practices conformance with the requirements of this policy. Vendors include all external providers of services to the company and include proposed vendors. No PII information can be transmitted to any vendor in any method unless the vendor has been pre-certified for the receipt of such information.

In principle, Expat-Links@ only shares the personal data with third parties if this is necessary for the performance of our services. In that context, for example, data can be shared with:

- Real estate agents, landlords;
- Moving and transport companies, car rental companies;
- Schools;
- Relevant government agencies, such as IND, GGD, customs;
- New general practitioner, dentist, utility companies;
- Employer/seconded;
- Other third parties, if Expat-Links@ is obliged to do so on the basis of a legal obligation or court order.

2. Personal Identity Information (PII)

Personal identification numbers or data which will be obtained via the employer and/or the employee, including (but not limited to):

- Name, address, place of residence, e-mail, telephone;
- Gender, nationality, place and date of birth, marital status, family members;
- Passport details;
- Other information that is necessary in view of the services to be provided by us, such as the employer, commencement of employment, date of relocation, accommodation requirements, information about pets, statement of employer, salary, bank account number.
- Taxpayer Identification Numbers (or their equivalent issued by governmental revenue entities).
- Employer Identification Numbers (or their equivalent issued by government entities).
- State or foreign driver's license numbers.
- Corporate or individually held credit or debit transaction card numbers

PII may reside in hard copy or electronic records; both forms of PII fall within the scope of this policy.

Social Security Numbers (or their equivalent issued by governmental entities such as immigration related personal V-number) will be processed only if it is required by law, for example to file the applications for the 30% ruling, making an appointment with the public health service for doing a TB check, or opening a bank account.

Data Breaches/Notification: Databases or data sets that include PII may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, the company will notify all affected individuals whose PII data may have been compromised, and the notice will be accompanied by a description of action being taken to reconcile any damage as a result of the data breach. Notices will be provided as expeditiously as possible and in no event be later than the commencement of the payroll period after which the breach was discovered.

The Legal department will handle breach notifications(s) to all governmental agencies to whom such notice must be provided in accordance with time frames specified under these laws. Notices to affected individuals will be communicated by Human Resources after consultation with the Legal department and within the time frame specified under the appropriate law(s).

3. The purpose and legal basis of the data processing

Expat-Links@ processes personal data for the following purposes:

- Home search and entering into lease agreements;
- Support with moving;
- Support regarding import and export requirements;
- Finding schools for children;
- Arranging temporary facilities such as temporary housing facilities, transport, rental car;
- Arranging services and facilities such as utilities, internet, cleaning services, general practitioner, dentist;
- (Assisting in) making applications for a work or residence permit, a social security number or for applying the 30% ruling;
- Making an appointment with the GGD for making a compulsory TB check;
- (Assisting in) opening of a bank account;
- The handling of complaints and disputes;
- Providing information to expats and employers and promotion of our services;
- Archiving purposes;
- Compliance with legal obligations.

The legal basis for the processing is that the processing is necessary for the performance or the entering into of a contract between Expat-Links@ and the assignee, for the compliance with legal obligations and for the representation of legitimate interests of Expat-Links@ and the users of our services. These legitimate interests include the ability for us to offer our services and the ability for expats and their employers to use them.

In specific cases, for example if we need to process health data, we ask the assignee for his/her permission. We also request the permission for sending commercial e-mail and the placement of cookies and web beacons. This permission can be withdrawn at any time.

4. Transfer of personal data outside the European Union

We will not transfer any personal data outside the European Union, unless this is necessary for the performance of our services, for example because we support the assignee in moving to or from the country in question. In such cases - insofar as the country concerned does not have an adequate level of protection as referred to in Article 45 of GDPR - the transfer will take place on the basis of appropriate safeguards as referred to in Article 46 of GDPR, or in accordance with one of the conditions referred to in Article 49 of GDPR, if for example the transfer is necessary for an agreement between the assignee and Expat-Links@, or for the performance of an agreement concluded in his/her interest between Expat-Links@ and a third party, for example his/her employer, or because the assignee has agreed to the transfer.

5. Retention of personal data

Expat-Links@ understands the importance of minimizing the amount of PII data it maintains and retains such PII only as long as necessary. A joint task force comprising members of the Legal, Finance, IT, Contracts and Human Resources departments maintains organizational record retention procedures, which dictate the length of data retention and data destruction methods for both hard copy and electronic records.

We do not store the assignee's data for longer than necessary for the purposes mentioned under 2. Any data will be deleted no later than 5 years after the end of our assignment, unless the data must be retained for a longer period in connection with a legal obligation.

6. Regulatory Requirements

It is the policy of the company to comply with any international, federal or state statute and reporting regulations. Expat-Links@ has delegated the responsibility for maintaining PII security provisions to the departments noted in this policy. Expat-Links@ Legal department shall be the sole entity named to oversee all regulatory reporting compliance issues. If any provision of this policy conflicts with a statutory requirement of international, federal or state law governing PII, the policy provision(s) that conflict shall be superseded.

7. PII Training

All new hires entering the company who may have access to PII are provided with introductory training regarding the provisions of this policy, a copy of this policy and implementing procedures for the department to which they are assigned. Employees in positions with regular ongoing access to PII or those transferred into such positions are provided with training reinforcing this policy and procedures for the maintenance of PII data and shall receive annual training regarding the security and protection of PII data and company proprietary data.

8. Confirmation of Confidentiality

All company employees must maintain the confidentiality of PII as well as company proprietary data to which they may have access and understand that that such PII is to be restricted to only those with a business need to know. Employees with ongoing access to such data will sign acknowledgement reminders annually attesting to their understanding of this company requirement.

9. Violations of PII Policies and Procedures

Expat-Links@ views the protection of PII data to be of the utmost importance. Infractions of this policy or its procedures will result in disciplinary actions under the company's discipline policy and may include suspension or termination in the case of severe or repeat violations. PII violations and disciplinary actions are incorporated in the company's PII onboarding and refresher training to reinforce the company's continuing commitment to ensuring that this data is protected by the highest standards.

10. Cookies

Expat-Links@ Group uses the following cookies for its website.

11. Your rights

You have the right to request Expat-Links@ access your personal data. If the information is incorrect, incomplete or irrelevant, you have the right to request rectification. You also have the right to object to the processing and to request Expat-Links@ to delete the data.

Insofar as the processing is based on your consent, you have the right to withdraw the permission at any time. Withdrawal does not affect the lawfulness of the processing on the basis of the consent before it is withdrawn.

If you wish to make use of your aforementioned rights, please contact Expat-Links@ by letter or e-mail using the contact details provided below. Expat-Links@ makes a decision on your request within four weeks.

You also have the right to lodge a complaint with the supervisory authority. The competent supervisory authority is the Dutch Data Protection Authority (www.autoriteitpersoonsgegevens.nl).

Associated documents, please request a copy at info@expat-links.com:

- 2 EGQS AF 2.18 Data Retention Policy
- 2 EGQS AF 2.17 Data access and separation of duties Expat-Links@