

# Privacy statement

## Introduction

Tradinco instrumenten-Apparaten B.V. is an internationally operating specialist company active in test, measurement and calibration products, services and software. Tradinco is located in Zoetermeer (Radonstraat 250, 2718TB).

This is the privacy statement of Tradinco Instrumenten- Apparaten bv, hereinafter called 'Tradinco', registered in the Trade Register at the Chamber of Commerce under number 27210742.

This privacy statement relates to the processing of your personal data by Tradinco. In this declaration, Tradinco informs its data subjects about the various data processing operations that take place.

## Handling of personal data

Tradinco respects the privacy of all stakeholders such as but not limited to employees, customers, suppliers, associates, users of our website. We ensure that the personal information you provide us with is treated confidentially. This privacy statement applies exclusively to Tradinco.

## Purposes of processing

Tradinco collects and processes personal data for the following purposes:

1. fulfilling its role as an employer for employees, both permanent and flexible, which in any case but not exclusively includes the following processing operations: building and managing personnel and absence files, payroll administration, fulfilling obligations in the context of reintegration, assessing employee suitability;
2. fulfilling its role as a contractor or supplier in many areas within the many different facets in which Tradinco operates, which includes at least but not exclusively the following processing: managing data of prospects, clients and customers in CRM and maintaining these business relationships;
3. providing data of permanent and flexible employees to clients and customers, which is necessary for the execution of an agreement. The law requires Tradinco to provide certain data of its employees to these clients/clients where the employees are employed. These clients/clients must be able to verify the identity of the employees and include data in their records. Where the basis for provision is not laid down by law, but the customer/client nevertheless requires Tradinco to do so, a test is always carried out to assess whether the provision of data takes place in accordance with the Personal Data Protection Act;
4. providing employee data to the central government, where this is requested/required, e.g. to obtain a certificate of good conduct for employees;
5. providing data to processors of Tradinco, which is necessary for the execution of an agreement between Tradinco and this processor. A processor of Tradinco must always sign a processor's agreement in which the rights of those involved are sufficiently guaranteed and the processor is obliged to secure the data appropriately.

When personal data is processed without being covered by any of the above purposes, a test is conducted at all times to assess whether any of the legal purposes apply and whether a lawful basis for processing exists.

## Processing of personal data: employees and business associates

The processing of employees' personal data within Tradinco mainly takes place in the HR field. Tradinco only processes data on its employees that is necessary for the creation and maintenance of personnel and, if necessary, absence files. During employment and the statutory retention periods after termination of employment, in addition to the necessary basic employee data, Tradinco keeps in the file a copy of the ID card, references and certificates and if necessary/applicable pre-screening documentation, A1 statements, residence permits, employment permits and notifications.

In addition, data of business relations are processed, namely (potential) customers, suppliers and (other) cooperation partners. The data that Tradinco processes from its business relations are mostly company data and do not fall under the Personal Data Protection Act. The data of contact persons (name, contact details, function) of all business relations does fall under the Personal Data Protection Act. Tradinco handles all data very carefully. The company data is also treated very confidentially.

### **Disclosure of data to third parties**

The provision of personal data to third parties may be necessary to execute an agreement, or to comply with laws and regulations. This provision is made with the aim of improving service provision, improving customer experience, improving working conditions, the health of our employees and reducing absenteeism. Under no circumstances does Tradinco provide personal data to third parties for commercial gain.

In order to execute agreements with clients/clients and one of the purposes mentioned above, Tradinco must supply data to these parties. Tradinco always checks that the client/client does not request more data than necessary for the purpose and makes agreements with these parties in order to guarantee the protection of this data. If required by law, Tradinco will supply data to the central government or enforcement agencies.

### **Engaging processors**

To perform its employer role, Tradinco may use or outsource services to third parties. Examples include the outsourcing of: payroll administration, ICT management, strategic personnel planning and the deployment of freelancers. These third parties can process personal data, as a result of which they are considered processors under the Personal Data Protection Act. Tradinco demands a high level of protection of personal data from its processors. The bar is higher for processors than for Tradinco itself, as the data is processed outside the Tradinco environment and processing therefore takes place less within Tradinco's sight. Processors are selected partly on the basis of their privacy policy, agreements are laid down contractually and, if there is reason to do so, compliance with them is checked.

### **Special personal data**

We only process special personal data insofar as you explicitly give permission to do so, or insofar as there is a (different) legal basis for doing so. Special personal data are data about a person's religion or belief, race, political affiliation, health, sexual life, as well as data concerning trade union membership. It also includes criminal data and data relating to unlawful or nuisance behavior in connection with a ban imposed as a result of such behavior.

The special data that we process are mostly data that can be derived from your proof of identity, of which we are required by law to make a copy if you start working for us. In addition, we may process special personal data relating to your health, benefit situation or background. We do this to be able to make use of (premium) discounts and/or subsidies, to fulfill our reintegration obligations and to implement the government goal of helping people with a large(er) distance to the labor market find work, which is reflected in various (future) laws and regulations. Persons with a large(er) distance to the labor market include people who are unemployed for a longer period of time, are 50 years of age or older, and/or without reintegration support do not or hardly find employment.

Only persons who need to have access to the special personal data you provide us with for the performance of their work and/or to comply with applicable laws and regulations have access to these data. These include the personnel, financial, absence and/or salary administration, processors, persons involved in (internal and external) quality control, (the supervision of) financial reporting and the implementation of premium discount and subsidy schemes. We may also pass on the special personal data received from you to our clients if there is a legal basis for doing so.

Furthermore, we may pass this data on to government agencies that supervise the implementation of government objectives and/or the granting of (premium) discounts and/or subsidies

### **Data protection**

Tradinco makes every effort to take appropriate organizational and technical measures to secure your personal data against unlawful processing and/or loss.

Employees of Tradinco, who have access to your personal data, are bound by a confidentiality clause. Security focuses on the protection of information itself and the means on which it is stored such as various information systems, hardware, operating systems, databases, corporate networks and the physical locations.

Despite the security measures we take, it may happen that others manage to circumvent these measures and/or use your personal data for improper purposes. Tradinco can never be held liable for this in any way.

### **Retention policy**

Tradinco does not retain your personal data longer than is necessary for the purposes for which it was collected and complies with the applicable laws and regulations in this regard.

### **Inspection, modification, deletion of personal data**

Tradinco employees have access to their own data and can request access to their own personnel file from the relevant HR manager, as well as request changes, deletion or obtaining a copy of the data. Business relations can submit the same requests to their contact person within Tradinco.

### **In conclusion**

Tradinco reserves the right to make changes to this privacy statement. This version was adopted on May 23, 2018.