

Version of: 28 March 2025

Privacy Statement Accell Group B.V.

The protection of Personal Data is important to Accell Group B.V. We are committed to respecting and protecting your privacy by acting in accordance with all applicable privacy laws and regulations including the General Data Protection Regulation ("**GDPR**"). Furthermore, we apply the following general principles of privacy and data protection:

- We limit use and Processing of Personal Data to the purposes we need it for;
- We only Process Personal Data with a legal basis, which may include the performance of a contract, our legitimate interest, or in limited circumstances your explicit consent;
- We will be transparent and clear about when, how and where we Process Personal Data;
- We will apply the standards of "privacy by design" and "privacy by default" and assess any potential impact existing or new products or services may have on the privacy rights of data subjects;
- Personal Data will not be retained any longer than necessary and we will follow all applicable data retention terms.

Please read this Privacy Statement carefully. It provides important information about how we use your Personal Data (defined below) and explains your legal rights (in full transparency and in accordance with applicable laws and regulations) when you visit our website www.jobs.accell-group.com ("Website"), use our apps (Workday) ("Apps") and/or apply to a vacancy ("Applicant"). When we refer to "Processing" of Personal Data, we mean all use of your Personal Data, such as collecting, storing, modifying, forwarding and deleting.

Who are we?

Accell Group B.V.

Industrieweg 4

8444 AR, Heerenveen

Registered in the Netherlands under company registration number 01082289 ("Accell Group", "Accell", "we", "us" or "our").

If you have any questions about this Privacy Statement or want to exercise your rights set out in this Privacy Statement, please contact us by sending an email to: privacy@accell-group.com.

Accell Group B.V. is the controller with regard to the Processing of your Personal Data.

What information do we collect about you?

For the purpose of this Privacy Statement, Personal Data means any information through which we can directly or indirectly identify you ("**Personal Data**"). When applying for a job at Accell we collect and process the Personal Data that you decide to provide either through employment application



forms, through the resume posting and/or the sign-in process. It is not necessary to provide any employment application information to view job openings.

The Personal Data we collect about you include the following:

- Technical information, including your IP address and browser type and version, that we may collect when we use cookies, web beacons and similar technologies on our Website and in our Apps which collect information about the use of our Website or Apps. Please see our Cookie Policy to find out more.
- Your name, date and place of birth, contact details and qualifications (education, training courses and internships), documents evidencing your identity and right to work and any other information you listed on your resume or CV;
- If you contact us, in some cases we will keep a record of that correspondence;
- In the event that you are selected for a next step in the application process, we may process further Personal Data provided by you in interviews, by (e)mail and from observations by the recruitment staff you interact with:
- Feedback about you from our staff and third parties; where you give feedback on others, we may keep that too and that is also considered Personal Data about you;

Collection of your information and how we use it

We use the collected Personal Data for the following purposes:

- To provide you with services in connection to the application process, like examining the fit between your candidate profile and the requirements of the position you applied for or facilitating the process of applying for jobs/assignments. This includes sending your CV to other Accell Group companies or affiliated companies for their consideration;
- To further develop, test and improve our website/Portal, or other existing or new systems/processes to better serve you; this mainly takes place in the context of new IT systems and processes, so that information about you may be used in the testing of those new IT systems and processes where dummy data cannot fully replicate the operation of that new.
- We may also use your Personal Data for other legitimate (commercial) interests such as to generate aggregated statistics about the users of our Website, to assist in security and fraud prevention, to administer our Website and Apps, and for internal operations (including troubleshooting, data analysis, testing, research, statistical and survey purposes), for system integrity purposes (for example the prevention of hacking, spamming etc.), to allow you to participate in interactive features of our services, to operate company policies and procedures, to enable us to make corporate transactions such as any merger, sale, divesture, reorganisation, transfer of assets or businesses, acquisition, bankruptcy or similar event, or for other legitimate business purposes permitted by any applicable law.
- We may use your Personal Data in our database to reach out to you for any future career opportunities, if you have granted a consent for this.



• *To comply with our legal obligations.* Any information referred to above in section 'What information do we collect about you' may be used to maintain appropriate business records, to comply with lawful requests by public authorities and to comply with applicable laws and regulations or as otherwise required by law.

Data collection of children:

We do not allow children to register on our Websites and/or Apps when they are under the legal age limit. We will ask for parental consent for children participating in our experiences and events.

Disclosure of your information

We may share your Personal Data with but never sell it to third parties:

- Other Accell Group companies or affiliated companies in the context of the provision of our products and services or for internal purposes like IT.
- Third party service providers, who provide services to us such as Website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, Applicant service, email delivery, CRM, event management, marketing intelligence, auditing, fraud detection and other services of third parties.
- Permitted third parties subject to your consent or request to do so, for example to send you marketing communications, in line with your choices if you have opted into such sharing.
- Other parties as we believe to be necessary to comply with applicable laws, to respond to requests from authorities or for other legal reasons and to protect our rights.
- Additionally, we may use or disclose your Personal Data in the event of any reorganization, merger, sale, joint venture or other disposition of (part) of our business, assets or stock.

Other websites

Our Website may, from time to time, contain links to and from third party websites such as the websites of our partner networks (such as the retailers that sell our products), social media networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their content. Please consult the relevant third party's privacy policies before you submit any Personal Data to these websites.

Transfers of your Personal Data outside the EEA

We store your information within the European Economic Area (EEA) or countries that have received an <u>adequacy decision</u> by the European Commission.

Where we share your information with companies based outside (i) the EEA or (ii) countries that do not have an adequacy decision, we agree upon the Standard Contractual Clauses as approved by the



European Commission with the receiving party and ensure to implement additional safeguards as and when required.

How long do we retain Personal Data?

We Process your Personal Data for as long as necessary to fulfil the purposes we collected it for, unless a longer period is necessary to:

- comply with a statutory retention period or other applicable legal obligation;
- Process your Personal Data in relation to a legal procedure.

Your information will be retained in the system for a maximum of six (6) months after the procedure has been completed, unless you choose to delete your information (please see below for details on how to access or delete Personal Data). This is to facilitate your access and application for other job openings at Accell and/or to allow Accell to contact you should another job opportunity come up which may suit your candidate profile. After this period, you will be sent a reminder so that you can extend the amount of time that we hold your Personal Data, if you do not reply, Accell Group will delete your candidate profile and Personal Data.

If you are successful in finding a job with us, we will keep your relevant Personal Data for a longer period in order to comply with ongoing legal and contractual obligations. Generally, we retain your Personal Data concerning taxes, employment contracts and any financial information for 7 years and other Personal Data for 2 years.

How do we secure Applicant data?

Protecting your Personal Data is very important to Accell Group. We have implemented appropriate technical and organisational measures to ensure that your Personal Data is properly secured against unauthorised or unlawful use, access, disclosure or accidental or wrongful destruction and loss.

We take steps to limit access to your Personal Data only to those persons who need to have access to it for one of the purposes listed in this Privacy Statement. Furthermore, we contractually ensure that any third party Processing your Personal Data equally protect your Personal Data in line with applicable Data Protection laws and in line with this Privacy Statement.

Your rights

You have the following rights in relation to the Personal Data we hold about you:

Your right of access

You have the right to request access to your Personal Data. For example, the right to be provided with certain information about the Processing of Personal Data and access to that data. Please note this right is subject to exceptions.

Your right to rectification

If the Personal Data we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified.



Your right to erasure

You can ask us to delete or remove your Personal Data in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable).

Your right to restrict Processing

You can ask us to restrict the Processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or you object to us.

Your right to data portability

You have the right, in certain circumstances, to obtain Personal Data you've provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

Your right to object

You can ask us to stop Processing your Personal Data, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to Process your Personal Data, except if we can demonstrate compelling legal grounds for the Processing; or
- Processing your Personal Data for direct marketing purposes.

Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for Processing your Personal Data, you have the right to withdraw that consent at any time. However, please note that the withdrawal of your consent does not impact the legality of any Processing prior to such withdrawal.

Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including the way we have handled your Personal Data, you can report it to your local <u>supervisory authority</u>.

Please note that some of the abovementioned; rights may be limited where we have an overriding interest or legal obligation to continue to Process the Personal Data.

Contact and Complaints

The primary point of contact for all queries in relation to this Privacy Statement, including a request to exercise data subject rights, is our Data Protection Officer (DPO). The DPO can be contacted in the following way:

Via e-mail: privacy@accell-group.com

By phone: + 31 513 63 8703

Postal address:

Accell Group B.V.

Industrieweg 4

NL-8440 AK Heerenveen, The Netherlands



If you have a complaint or concern about how we use your Personal Data, please contact us in the first instance and we will endeavour to resolve the issue as soon as possible.

Status of this privacy statement

This Privacy Statement may be revised from time to time. Any change will be applicable at the time of posting on the Website.