



# APPLICANT PRIVACY STATEMENT

May 25, 2018

## INTRODUCTION

This Applicant Privacy Statement (“**Statement**”) describes our practices in connection with all the personal information (**Personal Data**) that we collect through the Careers section of the websites of all entities of LeasePlan and offline in connection with your application for a job or internship with LeasePlan Corporation N.V. or one of our affiliates [<https://www.leaseplan.com>] (hereafter together **LeasePlan**). Please note that the Careers Site is not intended for minors under the age of 16.

Personal Data submitted elsewhere on LeasePlan’s and its affiliates’ websites will be used in accordance with our general [online Privacy Statement](#).

## WHAT PERSONAL DATA DO WE COLLECT?

We collect information provided by you in connection with your application, including:

- Name, address, telephone number, e-mail address, and other contact information;
- Work authorization status;
- CV, résumé, cover letter, previous work experience, education information and confirmation that a certificate of good conduct has been issued at the time of entering into employment;
- Skills;
- Professional and other work-related licenses, permits and certifications held;
- Information relating to references; and
- Any other information you provide us with (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships).

LeasePlan is an equal opportunity employer, which means we offer equal treatment to all applicants. In certain cases we are required to ask questions about race/ethnic origin, gender, and disability of our applicants, for purposes of monitoring equal opportunity of our recruitment process. If not required by law, we will also ask you to provide this information for the same purposes, which you can provide on a voluntary basis. The relevant job vacancy will indicate whether the relevant information is mandatory or voluntary. Otherwise, we ask that you avoid submitting information which may qualify as sensitive information under applicable law, except where such information is legally required. Sensitive information includes race, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, veteran status, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings.

Any information you submit through the Careers Site must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party’s rights.

If you provide us with Personal Data of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

## HOW DO WE COLLECT YOUR PERSONAL DATA?

We and our service providers collect Personal Data in a variety of ways, including:

- **Through the Careers Site**
  - We collect Personal Data through the Careers Site, for example, when you submit your CV or apply for a job.
- **Offline**
  - We collect Personal Data from you offline, for example, when you send us your CV by post or provide Personal Data by telephone.
- **From Other Sources**
  - We collect Personal Data from third parties, such as, Finn, LinkedIn, Indeed, Glassdoor, Jooble, Adzuna, Jobrapido, Careerjet and via recruitment agencies.
  - For the purpose of background check reports in connection with your application, and as permitted by applicable law, LeasePlan obtains information about you from other sources, which include:
    - Your references;
    - Prior employers; and
    - Educational institutions you attended.
- **Through cookies and other tracking technologies.** We and our service providers use “cookies” and similar technologies on the Careers Site. Please see our [Cookie policy](#) for more information.

## HOW DO WE USE YOUR PERSONAL DATA?

We collect and process information about you for one or more of these reasons:

- a) Because this information is necessary to take steps at your request prior to entering into an employment or internship;
- b) Because this information is of particular importance to us and we have a specific legitimate interest under the law to process it;
- c) To comply with a legal obligation;
- d) Because you voluntarily provide this information and consent for us to process it;

Where the collection or processing is based on your consent, you are free to refuse or withdraw consent at any time, without consequence to your application, to the extent permitted by applicable law. The withdrawal of consent shall not affect the lawfulness of the processing based on such consent before its withdrawal. The information that you submit on the Careers Site will be used for LeasePlan’s global personnel recruitment, management and planning purposes, as permitted by applicable law:

- **To process your application.** We will engage in these activities to manage our prospective contractual relationship with you, where we have a legitimate interest to do so;
- **To assess your capabilities and qualifications for a job.** We will engage in these activities to manage our prospective contractual relationship with you, where we have a legitimate interest to do so;
- **To perform reference checks.** Certain vacancies require the provision of specific references, which will be listed in the relevant job vacancy description. In such case, we use information to conduct reference checks. We will engage in these activities to comply with a legal obligation or where we have a legitimate interest to do so;
- **To communicate with you.** We will communicate with you about your application, and to send you information regarding the Careers Site and changes to our terms and policies. We will engage in these activities to manage our prospective contractual relationship with you;



- **To comply with or monitor compliance with any applicable law or regulation.** We will engage in these activities to comply with a legal obligation or where we have a legitimate interest to do so. Note that compliance with law can include laws outside your country of residence. ;
- **To perform pre-employment background checks.** Certain vacancies require a pre-employment background check, which will be listed in the relevant job vacancy description, In such case, we use information to conduct background checks if we offer you a position. We will engage in these activities to comply with a legal obligation or where we have a legitimate interest to do so; and
- **Legitimate business purposes.** Where we have a legitimate business interest to do so, for example, for LeasePlan's administrative purposes, internal aggregate management reporting, internal training.
- **With your consent,** but only for purposes where we request information that you can provide on a voluntary basis, such as consent to process diversity information for purposes of monitoring equal opportunity of our recruitment process or to keep your cv on our international candidate database for future consideration.

If we hire you, Personal Data we collect in connection with your application can be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes.

Providing Personal Data to us through the Careers Site is voluntary. However, if you do not provide sufficient information, LeasePlan may be unable to consider your employment application or, if you are hired, your subsequent promotion, transfer or relocation.

#### WHO HAS ACCESS TO YOUR DATA?

We will limit access to Personal Data to personnel with a business need to know the information for the purposes described in this Statement, including personnel in the recruiting, human resources and information technology departments, and in the department responsible for your interview and/or for the position for which you are applying.

LeasePlan also shares Personal Data with our third-party service providers to facilitate services they provide to us, including hosting and operating the Careers Site, recruiting assistance, and background check processing.

#### WHY PERSONAL DATA MAY BE TRANSFERRED TO THIRD COUNTRIES

LeasePlan is a global service provider that has clients and locations around the globe. The Personal Data we process for your application may be transferred to LeasePlan organisations and our service providers in other countries than your country of residence. This allows us to consider you for vacancies throughout LeasePlan. Some countries are considered to provide for an adequate level of protection of your Personal Data, according to EU standards. You can find a list of these 'adequate countries' [here](#). For the transfer of Personal Data to other countries, LeasePlan has put in place adequate measures to protect your Personal Data, such as binding corporate rules. You may obtain a copy of these measures by contacting us using the address in the '*How can you contact us or complain?*' section below or by following this link (<https://www.leaseplan.com/corporate/contacts>)

#### WHO WE DISCLOSE YOUR DATA TO

We also use and disclose your Personal Data as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To respond to requests from public and government authorities.
  - These can include authorities outside your country of residence.
- To cooperate with law enforcement.
  - For example, when we receive law enforcement requests and orders.
- To enforce our terms and conditions; and
- To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.



### **HOW LONG WILL WE KEEP YOUR DATA?**

Personal Data of candidates applying for a job (except for the US) will be kept for the duration of no more than one year, or such shorter period as required by applicable law. If required by applicable law, LeasePlan will ask your consent to keep your Personal Data for the above retention periods. After the retention periods LeasePlan will delete your Personal Data. U.S law requires LeasePlan to keep Personal Data of candidates applying for jobs within the United States for a period of two years.

### **HOW DO WE SECURE YOUR DATA?**

We seek to use reasonable organizational, technical and administrative measures to protect Personal Data within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “*Contact Us*” section below.

LeasePlan hereby disclaims, as far as permitted by local laws, any liability for itself and its affiliates and contractors for any Personal Data we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed or not timely delivered to our Careers Site.

### **DOES THIS STATEMENT COVER THIRD-PARTY WEBSITES?**

This Statement does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Careers Site links. The inclusion of a link on the Careers Site does not imply endorsement of the linked site or service by LeasePlan or our affiliates.

### **WHAT IF YOU ALREADY HAVE A POSITION AT LEASEPLAN?**

If you currently work for LeasePlan or one of our affiliates, you can use the Careers Site to apply for a different position within LeasePlan. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with the HR manager for the new position concerning application eligibility, benefit programs, and HR policies applicable to that position.

The Careers Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

### **CHANGES TO THIS STATEMENT**

We reserve the right to amend this Statement at any time in order to address future developments of LeasePlan, the Careers Site or changes in industry or legal trends. The “Last Updated” legend at the top of this Statement indicates when this Statement was last revised. Any changes will become effective when we post the revised Statement on the Careers Site.

### **HOW CAN YOU CONTACT US OR COMPLAIN?**

If you have questions, requests or complaints, please feel free to contact us via the contact page.

Because email communications are not always secure, please do not include sensitive information in the emails you send us.

## HOW CAN I EXERCISE MY RIGHTS TO UPDATE OR CORRECT INFORMATION ABOUT ME, OR TO OBJECT TO THE USE OF THAT INFORMATION?

If you register on the Careers Site, you may access, review, and change your Personal Data stored therein by logging into the Careers Site and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change Personal Data that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your Personal Data if it changes or is inaccurate.

You may, where permitted by applicable law, request access to or a copy of your Personal Data, have these rectified, deleted or the processing thereof restricted (as appropriate), to object to the processing thereof or request portability of your Personal Data. Please make your request by contacting us as indicated below in the “*How can you contact us or complain?*” section. Please note that due to (among other things) the application process which you can enter via the Career Site, we may not be required to comply (or fully comply) with your request. In those circumstances, we will write to you explaining why we are unable to comply.

In your request, please make clear what Personal Data you would like to access or have changed or deleted, or otherwise let us know what limitations you would like to put on our use of your Personal Data.

For your protection, we only implement requests with respect to the information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. Please note that certain Personal Data may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

You also may:

- Contact us at [corp-hr.services@leaseplan.com](mailto:corp-hr.services@leaseplan.com) with any questions about this Statement.
- Contact our Group Privacy Officer and Data Protection Officers for the various entities via the local websites.
- Lodge a complaint with a data protection authority for your country or region, or in the place of the alleged misconduct. A list of data protection authorities can be found here [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

## ACKNOWLEDGEMENT

By sending LeasePlan my application and CV I acknowledge that have reviewed and understood this Statement.