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Transparant Privacy Champion

Badenoch&Clark is a brand that in Belgium is used by XPE Group NV (hereinafter “**Badenoch&Clark**” or “**B&C**”), which in turn is a part of the Adecco group.

Adecco (Belgium) champions your privacy and uses your personal data in accordance with the privacy act of 8 December 1992. You can find more information on Adecco Belgium on www.adecco.be “>About Adecco” respectively “>Legal Info” and on privacy and data protection at the Belgian privacy commission website at www.privacycommission.be.

This general privacy statement aims to transparently inform you about (a) the use of cookies on www.badenochandclark.be and (b) the processing of personal data of (1) website **users**, (2) **candidates** and (3) **workers** (on the payroll or freelance) performed by XPE Group NV and, in part, the other entities of Adecco Belgium and **your rights as a data subject**.

B&C may amend this privacy statement. B&C will inform you on material changes with a message sent via a channel known to B&C (e.g. email, sms,...). Any other change, the change of mere factual information (e.g. coordinates of contacts) or changes due to a change in the law, B&C may inform you in the same way, only B&C does not commit to do so. In any case B&C urges you and assumes you to, periodically and at least every two months, re-read this privacy statement and re-confirm it.

Controller of the Data

XPE Group NV (for more info: ">Legal info") is the owner of the website www.badenochandclark.be and responsible for the cookies and the primary controller of the data collected on and via the website.

As for the information on processing of data on candidates and workers the distinction must be made between

- the companies of Adecco Belgium that actually (can) employ the candidate or worker.
- the customers of the entities of Adecco Belgium that are looking for a worker respectively are actually employing a worker.

As primary controller XPE Group may pass on relevant information to such other entities of Adecco Belgium or customers, which are then controllers in their own right. This is in particular so for XPE Personnel Services NV (for more info: ">Legal info"), (1) as any employment to XPE customers as temp workers is set up via XPE Personnel Services and (2) as the ownership of the website www.badenochandclark.be, the HR activities under that brand, and the primary controllership for the data collected on and via the website, may be transferred to XPE Personnel Services (which at the time may decide to change its corporate name).

You consent !

Your consent to the processing mentioned in this privacy statement is a pre-requisite to use of the website and/or the services of B&C.

Of course, for some data processing operations, e.g. direct marketing and satisfaction research, B&C acknowledges and respects your right to object. Please, check the section "overarching" for more information on your rights and how to exercise them.

Website - Cookies

By continuing to navigate our website and engage with the content and features of the site you provide us with consent to use the (third party) cookies as defined in this policy.

Website - User

By engaging with the website, you agree to the processing of your data as mentioned in this privacy statement. The specific checkboxes allow you to express your preferences ("consent" or "object") a.o. with regard to use of your data for adjacent purposes.

Candidates

By uploading your resume or otherwise presenting yourself as a candidate to B&C, you show the intention of using the services of B&C and you agree to the processing of your data as mentioned in this privacy statement, in particular you accept

- your responsibility for the data being accurate, correct, complete and up-to-date, which amongst others includes the duty to inform B&C of any changes immediately,
- the vetting of your personal data a.o. with educational institutions, prior employers, governmental databases (e.g. VAT), and references, and through tests,
- B&C and/or persons who wish to make use of or are contemplating making use of your services to contact any prior employers or other references (as the case may be your former line management and/or the HR manager in the company) you provide to B&C, via your resume or otherwise.
- B&C passing on of (a selection of) personal data to potential employers in the largest sense (including a.o. customers of project sourcing), where such information, depending on the function may be transferred within the group of companies to which the potential employer belongs.
- B&C may assume unconditionally that you agree to their possible processing of sensitive, medical or judicial information you have provided to B&C, to the extent the law does not prohibit (specific) processing.

Workers

By contracting with B&C for a job as a worker, you agree to the processing of your data as mentioned in this privacy statement, in particular you accept:

- your responsibility for the data being accurate, correct, complete and up-to-date, which amongst others includes the duty to inform B&C of any changes immediately,
- B&C contacting customer-employers to follow-up on your performance.

Different levels of processing

Website - Cookies

ONLINE EXPERIENCE - B&C is committed to providing you with the best online experience while visiting any of its websites. As part of this process, we use standard (third party) cookies to obtain data about a user's behaviour online while he is on our site.

COOKIES - Cookies are small pieces of text that are drawn up by a program on the B&C website server but stored on your PC (on the hard drive). If you wish to learn more about cookies in general and how to manage them, you can visit a.o. www.aboutcookies.org.

ADECCO COOKIES - The cookies used by B&C are at least in part technically necessary for smooth communication between your PC and the B&C websites (e.g., to coordinate with the operating and browser systems on your PC or to enable secure connection). Cookies can however also be useful for storing and are used to store on your PC a number of (default) settings, all or part of your login data, your browsing history and suchlike, and to send all or some of this data to the website to which the cookie is linked. The website is then able to use this incoming data to evaluate and improve the website and the processes used on it. Our cookies do not store financial information or information which is capable of directly identifying you (such as your name or address).

We collect information about the number of times our site is visited, where each visitor came from (i.e. the site visited prior to coming to our sites) and where each visitor goes to from our site (the next site visited after ours), and the number of people who return to our website. We

also support sharing webpages and collect information on the conversation our website triggers via that possibility.

The main cookie using functionality is

- google analytics, which supports the high-level, statistical analysis of the use of the website; more info on <http://www.google.com/intl/en/analytics/> and in Google's Privacy Policy

The information collected via cookies is collected as an aggregate and therefore is not collected as personal data about you as an individual. A cookie is stored on your website for a maximum of 2 years, which allows us to determine with some accuracy which is a "unique", returning visitor and which is not.

YOUR COOKIE PREFERENCES - If you prefer we do not track your cookie information, you can set your browser to reject cookies. As each browser is different, please, visit the 'Help' menu of your internet browser to find out how to change your cookie preferences. This may impact your user experience on our site and restrict you from using certain site functionalities.

THIRD PARTY COOKIES - Throughout your journey on www.badenochandclark.be you may notice that there is content from other websites, for example a video from YouTube or a location map from Google. We also offer you the opportunity to further engage with us and share information with others using social networks such as Twitter. This content is added so we can keep you up to date with selected information that you may find relevant or of interest, however this can result in these websites sending cookies that we have no control over. Consequently we suggest you check any third-party websites for more information about their cookies and how you can manage them.

Website - User

Which data are processed?

Personal data on users of the website depends on the engagement of the user with the website.

- Of all users there is some data that is gathered via cookies. Only exceptionally is this to be considered personal data as the link cannot be established between the information on or transferred by the cookies and the user, or requires access to information to which B&C has no access.
- Users that subscribe to the newsletter, provide some identification and contact details.
- Users that use the contact form, provide the data in the contact form.
- Users that signed in to one or more embedded web-applications provided a login and a password, and any data that is provided via the web-application(s), including the log of your actions in the web-application(s).

What is the purpose of processing the data?

The (personal) data on users, if any, is processed – as the case may be in specific applications - for the following purposes, which are all within the broad range of B&C's activities:

- The data stored on or gathered by cookies, the support of the user experience on the website, e.g. through the retention of (language) preferences and – on an aggregate, statistical level – the analysis of the user behaviour on the website to support decision on the setup or change of the website and its functionalities.

- For users that subscribed to the newsletter, delivery of the newsletter, and – in case of unsubscribing – the blocking thereof.
- For users that used the contact form, engaging in the conversation and answering the request.
- For users of web-applications the authorization management to the web-application and (the facilitation or personalisation of) the interactions foreseen for that specific web-application.
- The *security* and protection of the website, and B&C's assets.
- Complying with *statutory obligations* to the extent there is a legal basis thereto, such as storing the request to block direct marketing to users or user coordinates.
- Aggregating statistics and management reports, e.g. to analyse a region or communication channel, in which case the link with any individual, if any, is cut as soon in the process as possible.
- Performing research on the website's performance and users, and on the HR sector in general and in particular on demographics and satisfaction, in which case the link with any individual is cut as soon in the process as possible.

As for the purposes for the data on candidates, reference is made to the specific section that focusses thereon.

Who receives the information?

ADECCO BELGIUM - At B&C people only receive the relevant data for the execution of their job. In most cases the data is handled by the units in the IT department respectively the marketing department which are responsible for the website www.badenochandclark.be. Data from contact forms in general is handled by the unit responsible for (re)acting to your request either within XPE Group or another entity of Adecco Belgium, as the case may be, preceded by a dispatching unit. For a short description of the entities of Adecco Belgium and the services they provide, reference is made to www.adecco.be > legal info and www.xpe-group.be > On XPE.

PROCESSORS – Reference is made to the information in the section “overarching” below.

THIRD PARTIES - Other third parties who may get to see (some) personal data are government staff (see purposes above) within the limits of what they can legally request.

Candidate

When you upload your resume via the website, completing and transmitting candidacy forms or otherwise present yourself as a candidate to B&C (even outside of the website), this section applies.

Which data are processed?

GENERAL – You should presume that all information that you provide to Adecco, that is publicly available (e.g. on your linkedin profile, your twitter account, your website or your blog) and any derivatives thereof (e.g. extracts, compilations, or summaries), in principle may be processed by B&C in the context of its activities.

CURRICULUM VITAE – B&C processes your resume and any data that is mentioned in there e.g. contact details, professional experience, references, education, diplomas, certificates, relevant knowledge, skills and experience, but also, as the case may be, pictures, hobbies,

etc. This entails a.o. that B&C may present an extract or compilation of such data to potential employers, at its discretion, e.g. to summarize or visualize the data or to make a uniform presentation to such potential employers.

REFERENCES – B&C can contact references you pass on. This also includes those situations where you do not explicitly mention a contact for the organization (e.g. a prior employer or customer), by contacting that organization in general (mainly the HR department or your line manager at the time). In general B&C will only contact references with which you had a contact in the last five years. B&C can process the information it receives from those references.

(INTER)ACTIONS IN THE CANDIDACY RELATIONSHIP – B&C processes your prior and current applications in general or for specific positions, potential matches with vacancies, propositions, contracts, employment, and other actions that are executed in the context of the candidacy (e.g. training or coaching).

TEST RESULTS AND EVALUATIONS – B&C processes the results of the tests you perform, such as attitude tests, language tests, skill tests, practical tests, interviews, etc.

FEEDBACK OF CONTACTS - B&C processes feedback from people with who it brought you in contact, e.g. potential employers and employers.

SPECIAL CATEGORIES OF DATA - B&C will only process sensitive, medical or judicial data concerning you if it has obtained such information from you or with your consent. B&C will process such data in accordance with the legal conditions for doing so. This includes the anti-discrimination legislation and the legislation providing for the possibility to process an extract from the criminal records.

HEALTH DATA – B&C processes relevant health data that you provide and that are (visually) perceivable (e.g. wheelchair) based on the assumption that you explicitly agree to such processing, except in the case you have objected thereto based on reasonable arguments. It may at all times process relevant health data if there is a legal obligation to do so.

JUDICIAL DATA – B&C processes information on sanctions, verdicts, etc. that you provide, e.g. as stated in an extract of the criminal records that you show or transfer, only if there is a legal basis to do so. It may at all times process relevant judicial data if there is a legal obligation to do so.

PUBLICLY AVAILABLE INFORMATION – B&C can process publicly available information on you. This may involve information that has to be published (e.g. mandates in corporations published in the Belgian Official Journal) or information that is freely published (e.g. information on jobsites or social networks) or can be found by a simple search on the internet.

What is the purpose of processing the data?

The data are processed – as the case may be in specific applications - for the following purposes, which are all within the broad range of B&C's activities:

- Recruitment, vetting, selection and mediation in contracting and supplying (temporary, project based) personnel, including but not limited to checking your references and credentials, performing test, matching your candidate profile with profiles required (manually or supported by technology which may employ so-called fuzzy matching algorithms), presenting you with information on vacant position you may be interested in, passing on information to clients who are looking for candidates, and concluding (employment) contracts.

- Supplying (personalised) information on services, opportunities or special occasions that B&C, other companies in the Adecco group or other B&C partners provide or organise, possibly even via automatic communication systems (such as e-mail, mobile phone, text message and mms), or engaging via social media, if you have not expressed an objection.
- Complying with *statutory obligations*, to the extent there is a legal basis thereto, such as storing the request to block personalised information that is not merely administrative, offer you a certificate of hour and date of an interview, proving that you have signed all required documents.
- Aggregating statistics and management reports, e.g. to analyse a region or communication channel, in which case the link with any individual is cut as soon in the process as possible.
- Performing research on our operations, our services and in the HR sector in general, and in particular on satisfaction and mobility, in which case the link with any individual is cut as soon in the process as possible.

In the context of presenting that data to potential employers, B&C may choose, at its own discretion - e.g. for reasons of uniformity or easy comparison - to select, organise, paraphrase, summarize or visualise some or all relevant information it has on you.

B&C will not sell, trade, rent, lend or give away your personal data to others without your consent.

Who receives the information?

ADECCO BELGIUM - At B&C people only receive the relevant data for the execution of their job. In most cases the data is handled by the units that are most likely to be able to match you to a position.

As for entities, the data will be dispatched to and used by the entities that specialize in the position you apply for or are most likely to match your profile and preferences. For a short description of the entities of Adecco Belgium and the services they provide, reference is made to www.adecco.be > legal info and www.xpe-group.be > On XPE.

PROCESSORS – Reference is made to the information in the section “overarching” below.

THIRD PARTIES - Other third parties who may get to see (some) personal data are customers of B&C which consider to employ a candidate and which are bound – as controllers - by the data protection regulation themselves, and government staff (see purposes above) within the limits of what they can legally request.

Workers

When you are working via B&C as a (temporary, project based) worker, this section applies. For the aspects that relate to you as candidate, please, check the section on candidates above.

Which data are processed?

GENERAL – You should presume that all information that you provided as a candidate and provide to B&C, that is publicly available and any derivatives thereof, in principle may be processed by Adecco in the context of its activities.

(INTER)ACTIONS IN THE WORKING RELATIONSHIP – B&C processes your prior and current engagement in general or in specific positions, contracts, employment, and other actions that are executed in the context of the candidacy.

TEST RESULTS AND EVALUATIONS – B&C processes the results of the specific tests you perform prior to and during any engagement, such as tests to be allowed to drive certain vehicles, medical tests, etc.

FEEDBACK OF CONTACTS - B&C processes feedback from people for and with whom you work at the customer, such as people from the HR department and your line management.

SPECIAL CATEGORIES OF DATA - B&C will only process sensitive, medical or judicial data concerning you if it has obtained such information from you or with your consent. B&C will process such data in accordance with the legal conditions for doing so.

HEALTH DATA – B&C processes relevant health data that you provide, that are (visually) perceivable, and that is the result of compulsory tests, based on a statutory obligation and/or the assumption that you explicitly agree to such processing, except in the case you have objected thereto based on reasonable arguments. It may at all times process relevant health data if there is a legal obligation to do so.

JUDICIAL DATA – B&C processes information on sanctions, verdicts, etc. that relate to you, only if there is a legal basis to do so, e.g. in case an infraction is (re)claimed from B&C for your behavior while working for B&C's customer, or in case there is a discussion or litigation with you or involving you. It may at all times process relevant judicial data if there is a legal obligation to do so.

PUBLICLY AVAILABLE INFORMATION – B&C can process publicly available information on you. This may involve information that has to be published or information that is freely published or can be found by a simple search on the internet, in as far as it may be relevant in the context of (the assessment of) your work, e.g. blogging on confidential information of the customer-employer.

What is the purpose of processing the data?

The data are processed – as the case may be in specific applications - for the following purposes, which are all within the broad range of B&C's activities:

- Administration related to the execution of the agreement, including concluding (employment or freelance) contracts, planning and follow-up of your engagement at the customer-employer, invoicing and related (personnel or freelancer) administration.
- Supplying (personalised) information on services, opportunities or special occasions that B&C, other companies in the Adecco group, the customer-employers you work(ed) for or other B&C partners provide or organise, possibly even via automatic communication systems (such as e-mail, mobile phone, text message and mms), or engaging via social media, if you have not expressed an objection.
- Complying with *statutory obligations*, if and to the extent it has a legal basis thereto, such as bookkeeping, providing the government with tax information (such as withholding tax on professional income for employees, information of invoices received, certificates and questions from a tax department within the scope of its authority) and social security information (such as social security contributions for employees and answering questions from the social inspection within the scope of its authority).

- Supporting the compliance of *the customer-employer with statutory obligations*, if and to the extent it has a legal basis thereto, such as answering questions from the social inspection relating to (temporary, project based) workers within the scope of its authority.
- Aggregating statistics and management reports, e.g. to analyse a region or communication channel, in which case the link with any individual is cut as soon in the process as possible.
- Performing research on our operations, our services and in the HR sector in general, and in particular on satisfaction and mobility, in which case the link with any individual is cut as soon in the process as possible.

B&C will not sell, trade, rent, lend or give away your personal data to others without your consent.

Who receives the information?

ADECCO BELGIUM - At B&C people only receive the relevant data for the execution of their job. In most cases your data as a (temporary, project based) worker is handled by the units that are working on the case of your engagement.

As for entities, the data will be dispatched to and used by the entities that you have signed an agreement with. For a short description of the entities of Adecco Belgium and the services they provide, reference is made to www.adecco.be > legal info and www.xpe-group.be > On XPE.

Note that your data as a worker is or may be relevant as a reference for you as a candidate, so in that context (part of) that data is also dispatched to and used by entities that place you as a candidate (see above).

PROCESSORS – Reference is made to the information in the section “overarching” below.

THIRD PARTIES - Other third parties who may get to see (some) personal data are customers of B&C which consider employ you as a worker, independent of the status of relationship, and which are bound – as controllers - by the data protection regulation themselves, and government staff (see purposes above) within the limits of what they can legally request.

Overarching

Common to all the above are the answers to a few remaining questions.

Where can you go with questions or to exercise your rights as a data subject?

Pursuant to the privacy act, you can request to:

- view the data concerning you that is processed
- rectify the data processed that concerns you and is not or no longer accurate or up to date
- block or delete the processing of your personal data that is being processed erroneously

If you have any questions regarding the processing of your data or to exercise these rights, please contact XPE Group, legal department, Noordkustlaan 16b, 1702 Groot-Bijgaarden, Belgium. You can also contact this service via quality@xpe-group.com. Please note that in some cases certain formalities cannot be completed electronically and that for some

requests XPE Group will forward your request to the actual controller for the data of your request.

Is part of the (actual) processing outsourced?

Yes, for the management and the processing of a set of data B&C employs external parties, mainly ICT service providers to manage Adecco's applications. Personnel from such service providers may also get to see some of that data within the limits of their authorisations and the purposes and instructions defined by B&C. Such providers are bound to B&C with agreements that include provisions on data protection to ensure a.o. the treatment of the data in line with the law and B&C's data privacy principles and adequate, robust security measures. The vast majority of providers are members of Adecco Belgium and to a lesser extent the global Adecco group and/or established in the European Union. The providers established outside the European Union are not always directly subject to legal requirements that are equivalent to those in the European Union. However, if they are members of the Adecco group data protection is ensured by policies at group level that are locally implemented. If they are not, data protection is ensured through specific contractual clauses.

How about security?

SECURITY EFFORTS – B&C sets out to secure its offices and servers and to keep out unauthorised people by implementing state of the art security measures. Unfortunately no security is 100% safe and B&C depends on elements out of its control, such as the internet. That is why B&C cannot, notwithstanding its security efforts, be held liable for any failure of the security.

BE AWARE – Keep in mind that a website and webapplications require transfer of data over the internet, which is out of the control of any single body. Do not take any (unnecessary) risks and act alert and responsibly. Do not pass on your login details to anyone and warn B&C (via quality@xpe-group.be) should you know or suspect any tampering with your data or account(s).