

Privacy Statement

Candidates & Applicants

Flexurity BV

Version 1.0 – 18 June 2026

Adopted by the management of Flexurity BV

This is a translation of the Dutch Privacy Statement. In the event of any discrepancy, the Dutch version prevails.

GENERAL PROVISIONS

Article 1 – Definitions

- a) AP: the Dutch Data Protection Authority (Autoriteit Persoonsgegevens), the supervisory authority.
- b) Data subject: the person to whom personal data relates. In this statement: the Candidate/Applicant.
- c) Candidate/Applicant: a natural person who applies to Flexurity BV, is approached by Flexurity BV, or whose personal data is processed by or on behalf of Flexurity BV for the purpose of recruitment, selection and placement, and who is not (or not yet) employed by or working for Flexurity BV.
- d) Flexurity BV: the controller within the meaning of the Law.
- e) Client: a company or organisation to which Flexurity BV proposes or seconds a Candidate/Applicant.
- f) Personal data: all data relating to an identified or identifiable natural person.
- g) Pool (candidate or talent pool): a collection of data of Candidates/Applicants that Flexurity BV retains in order to approach them at a later time for a suitable position.
- h) Sourcing: actively finding and approaching potential candidates through external sources, such as professional networks (for example LinkedIn), CV databases and external sourcers.
- i) Processing of personal data: any operation relating to personal data, such as collecting, recording, organising, storing, consulting, using, disclosing, erasing or destroying.
- j) Controller: the party that determines the purposes and means of the processing. In this case Flexurity BV.
- k) Law: the General Data Protection Regulation (GDPR) and other applicable privacy legislation.

Article 2 – Scope and purpose

- a) This Privacy Statement applies to the processing of personal data of Candidates/Applicants that is processed by or on behalf of Flexurity BV (wholly or partly automated) in the context of recruitment, selection and placement.
- b) This statement supplements the General Privacy Policy of Flexurity BV, which applies to staff. Once a Candidate/Applicant enters employment with or starts working for Flexurity BV, the processing of their data falls under the General Privacy Policy.
- c) This statement is published on www.flexurity.nl and is made available to the Candidate/Applicant at the moment their data is collected.
- d) This statement aims to protect the privacy of Candidates/Applicants, to prevent personal data from being processed unlawfully or for other purposes, and to safeguard the rights of Candidates/Applicants.

Article 3 – Data Protection Officer

- a) Flexurity BV has appointed a Data Protection Officer (DPO) who monitors compliance with privacy legislation and acts as the point of contact for the AP.
- b) The DPO can be reached by e-mail: f.cordier@flexurity.nl and by telephone: +31-(0)33-2533560.

PROCESSING OF PERSONAL DATA

Article 4 – Conditions for lawful processing

- a) Flexurity BV processes personal data in a proper, careful and transparent manner and in accordance with the Law.
- b) Personal data is processed only insofar as it is adequate, relevant and not excessive in relation to the purposes set out in Article 5.
- c) Flexurity BV does not process more data than necessary and does not retain it longer than necessary (see Article 17).
- d) The processing of Candidate/Applicant data is recorded in the processing register of Flexurity BV, stating the purpose, the legal basis, the recipients and the retention period.

Article 5 – Purposes of the processing

- a) Flexurity BV processes personal data of Candidates/Applicants solely for the following purposes:
 - assessing suitability for a current or future position;
 - approaching, informing and guiding the candidate during a recruitment or placement process;
 - proposing the Candidate/Applicant to one or more Clients;
 - building and maintaining a Pool in order to approach the Candidate/Applicant at a later time for a suitable position;
 - complying with legal obligations.

Article 6 – Legal basis for the processing

- a) For handling an ongoing application or placement, Flexurity BV relies on taking steps at the Candidate/Applicant's request prior to a possible agreement, and on its legitimate interest in recruiting and selecting suitable candidates.
- b) For retaining data in the Pool, after the ongoing process has ended, Flexurity BV relies on its legitimate interest (Article 6(1)(f) GDPR) to be able to continue to approach suitable candidates for suitable positions. This interest is anchored in the fundamental right to freedom to conduct a business (Article 16 of the Charter of Fundamental Rights of the European Union).
- c) Flexurity BV has documented a legitimate interest assessment for this processing, showing that this interest is not overridden by the interests or fundamental rights of the Candidate/Applicant. This assessment is available internally and is shown to the Dutch Data Protection Authority on request.
- d) The Candidate/Applicant has the right to object to this processing at any time (see Article 11).

Article 7 – Source of the personal data

- a) Flexurity BV obtains personal data of Candidates/Applicants in two ways:
 - directly from the Candidate/Applicant, for example through an application or a completed form; and
 - through Sourcing, that is, from other sources, such as professional networks (for example LinkedIn), public and commercial CV databases, and external sourcers.
- b) If Flexurity BV does not obtain the data directly from the Candidate/Applicant, it informs the Candidate/Applicant in accordance with Article 12, and in any event within a reasonable period of no more than one month after obtaining the data.

- c) When Sourcing, Flexurity BV processes only data that the Candidate/Applicant has made available for professional purposes and that is relevant to recruitment and selection.

Article 8 – Categories of personal data

- a) Flexurity BV processes, depending on the situation, the following categories of personal data of Candidates/Applicants:
- identification and contact data: name and address details, contact details, date of birth, gender and nationality;
 - CV and career data: CV, education, diplomas, work experience, motivation and availability;
 - skills, specialisations and certifications: technical competencies, position preferences and relevant qualifications (for example VCA, welding or forklift certificates, and driving licence);
 - information provided by the candidate: cover letters, an introduction video and other information the candidate provides themselves;
 - application and contact history: correspondence, records of interviews, and interview notes and assessments;
 - data from sourcing: the public professional profile (for example LinkedIn), insofar as relevant to the position;
 - technical and usage data: data collected automatically via our website or app, such as cookies;
 - for self-employed professionals (zzp), additionally: indication of hourly rate, field of work, mobility information, Chamber of Commerce details and other business data.
- b) Flexurity BV does not retain special categories of personal data (such as data on health or origin) in the Pool, unless there is a legal basis for doing so.

Article 9 – Recipients and disclosure

- a) Flexurity BV discloses personal data of Candidates/Applicants solely to:
- Clients to whom the Candidate/Applicant is proposed, insofar as the Candidate/Applicant is aware of this;
 - processors that process data on behalf of Flexurity BV, including the supplier of the recruitment and selection system (Carerix) and the planning system (Plan4flex), on the basis of a processing agreement;
 - third parties, where a legal provision requires this.
- b) With processors, Flexurity BV records arrangements in a processing agreement, including arrangements on security and confidentiality.
- c) Flexurity BV does not disclose candidate data to other third parties and does not sell it. The data is stored and processed in Carerix and, where applicable, in Plan4flex.

Article 10 – Transfer of personal data outside the EEA

- a) Flexurity BV processes and stores personal data of Candidates/Applicants exclusively within the European Economic Area (EEA). The external sourcers, suppliers and processors engaged also process the data within the EEA.
- b) Flexurity BV does not transfer this data to countries outside the EEA. Should this occur in the future, Flexurity BV will put in place a valid transfer mechanism (an adequacy decision or standard contractual clauses) and record this in the processing register.

RIGHTS OF DATA SUBJECTS

Article 11 – Rights of Candidates/Applicants

- a) The Candidate/Applicant has, under the conditions of the Law, the right to: information; access; rectification; erasure (“right to be forgotten”); restriction of processing; data portability; and objection to the processing.
- b) Where the processing is based on consent, the Candidate/Applicant has the right to withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out prior to the withdrawal.
- c) Where the processing is based on legitimate interest, the Candidate/Applicant has the right to object to the processing.

Article 12 – Provision of information

- a) Flexurity BV informs the Candidate/Applicant about the processing of their personal data: prior to or at the moment of collection if the data is obtained directly, and within a reasonable period of no more than one month if the data is obtained through Sourcing or otherwise not directly.
- b) Flexurity BV fulfils this information obligation by means of this Privacy Statement, which is made available on the vacancies page, with the application form, and in the first e-mail during sourcing.
- c) This statement is offered in Dutch and English, so that candidates who do not read Dutch are also informed in a language they understand.

Article 13 – Submitting a request

- a) The Candidate/Applicant can submit a request to exercise the rights set out in Article 11 to the Data Protection Officer of Flexurity BV, via f.cordier@flexurity.nl.
- b) Flexurity BV may request additional information to verify the identity of the person making the request.
- c) Submitting a request is in principle free of charge. In the case of manifestly unfounded or excessive requests, Flexurity BV may charge a reasonable fee or refuse the request.

Article 14 – Assessment of the request and time limit

- a) Flexurity BV will indicate, within one month of receiving the request at the latest, how the request will be handled. This period may be extended by two months; the Candidate/Applicant will be notified of this.
- b) If the request is granted, Flexurity BV will carry it out as soon as possible. If the request is not granted, the Candidate/Applicant can lodge a complaint with the DPO (see Article 18).

ORGANISATIONAL OBLIGATIONS

Article 15 – Security

- a) Flexurity BV takes appropriate technical and organisational measures to prevent loss or unlawful processing of personal data, taking into account the state of the art.
- b) Access to Candidate/Applicant data is granted only to persons for whom this is necessary to perform their duties.

Article 16 – Data breaches

- a) In the event of a personal data breach with a likely risk to the data subjects, Flexurity BV will notify the AP without delay, and, if the breach is likely to have adverse consequences for privacy, also the Candidates/Applicants concerned.
- b) A (suspected) data breach can be reported to the DPO.

Article 17 – Retention period

- a) Flexurity BV does not retain personal data of Candidates/Applicants longer than necessary for the purposes for which it was collected, taking into account legal obligations.
- b) Flexurity BV applies the following retention period:
 - Candidate/Applicant in the Pool: a maximum of 2 years after the last contact, on the basis of the legitimate interest of Flexurity BV (see Article 6); each new contact restarts this period.
- c) Once the retention period expires, the personal data is deleted.

TRANSITIONAL AND FINAL PROVISIONS

Article 18 – Complaints

- a) If the Candidate/Applicant is of the opinion that Flexurity BV is not acting in accordance with the Law or with this statement, they can turn to the DPO.
- b) If this does not lead to an acceptable result, the Candidate/Applicant can lodge a complaint with the AP.

Article 19 – Amendment and entry into force

- a) Flexurity BV may amend this Privacy Statement in accordance with applicable laws and regulations. The most recent version is published on www.flexurity.nl.
- b) This Privacy Statement was, following the management's approval, adopted by E. Klave and enters into force on the day after publication. Any previous versions are hereby superseded.