

This is the Privacy Statement of Middle Point. Middle Point processes personal data in order to provide you with a better service and so that we can carry out our work as efficiently and effectively as possible.

Middle Point considers the careful handling of your personal data of great importance, meaning that your personal data are carefully processed and protected by us. You can rest assured that your personal data are safe with Middle Point and that we will comply with the applicable legal regulations.

Why does Middle Point have a Privacy Statement?

This Privacy Statement sets out how we handle your personal data. This Privacy Statement will explain what personal data we process, for what purposes, who has access to your data, how we store your data, to whom we transfer your data and what your rights are in all of this. Your interests are our priority!

What is personal data?

Personal data are all data that can be traced back to a natural person, which means you. Personal data can include: your name, address, date of birth, phone number, email address and biometric data. We obtain this type of data from you, for example, when you fill out a form or send us a letter or email or during a telephone conversation. In some cases, you also provide us with personal data when you visit Middle Point's website. For example, in the form of an IP address or a cookie.

Once we receive your personal data, either from you or via a third party, we start processing the data. The meaning of the term processing is broad and includes: collecting, storing, consulting, deleting, using and providing data to third parties. However, deleting and destroying also falls under the term 'processing'.

What is the scope of this Privacy Statement?

This Privacy Statement applies to all your personal data that Middle Point processes in the context of providing its services in a fully or partially automated manner.

Whose personal data are processed by Middle Point?

We can process personal data of anyone we have contact with or who visits our website. These include (potential) contractors, seconded employees, payroll employees, clients, suppliers and business partners of Middle Point. We also process the personal data of the persons who act as the contact point for our (potential) clients, suppliers or business partners.

Please note: if you as an organisation or company provide us with your employees' personal data, you are required under the applicable legislation to inform your employees of this. You can give this Privacy Statement to your employees so that they will know exactly how Middle Point handles their personal data.

Who is responsible for the processing of your personal data?

The controller for the processing of your personal data is Middle Point, registered with the Chamber of Commerce under number 51745399 and having its registered offices at Transformatorweg 28 A1.07, 1014 AK Amsterdam. The controller is the party that formally and legally decides whether and, if so, what personal data are processed, for what purpose and how.

What does Middle Point do with your personal data?

Middle Point may only process your personal data if we have a legal basis to do so. The legal bases for processing your personal data are:

- your consent. Any consent that has been given can be withdrawn at any time;
- processing your personal data is necessary for the performance of an agreement;
- processing your personal data is necessary in order to meet a legal obligation;
- processing your personal data is necessary in order to protect your vital interests; and
- processing your personal data is necessary to meet Middle Point's interests, whereby your own interests do not take precedence.

Middle Point processes your personal data for the purposes of efficient and effective business operations, in particular in the context of performing the following activities:

Agency activities for natural persons, secondment, registration and relocation, payroll, application of the 30% scheme and facilitating the recruitment of employees by the client following a period of secondment.

In general, we only collect and process your data for the performance of our tasks as an employment agency, such as agency activities, secondment, payroll, agency activities for self-employed persons, recruitment & selection, registration and relocation, personal development and employability, payroll administration and personnel management.

More specifically, we will ask you to share your personal data with us for the following purposes:

- To enter into and maintain an employee/employer relationship or a personnel/employment agency relationship with you, and to keep a financial, personnel, hours, absenteeism and/or payroll administration for this purpose.
- To enter into and maintain a relationship aimed at acquiring/carrying out assignments and to keep a financial administration for this purpose.
- To assess your suitability for a certain job or assignment, to determine your availability and to put you into contact with or to propose you to one or more (potential) clients and/or relationships.
- To help you get work, to offer you career advice and/or other (work-related) services, including training, to place you with clients, to arrange work activities with clients or to arrange assignments for you.
- To be able to conclude agreements with you, our client(s) and/or relations and to be able to execute and fulfil them.
- To inform you about our services and other activities so we can better match your requirements and skills.
- For management purposes and for generating management information and reports, performing market analyses, (internal and external) checks, audits and for promoting and maintaining our quality and operational safety.
- To give you your own account to access and use our company web portal.
- To comply with the applicable legislation and regulations and/or to apply for subsidies and premium discounts; some examples include the identification or paying of taxes and social security contributions.
- To comply with the legal reintegration obligations and to comply with government policy to help the long-term unemployed back to work.
- To send you personalised and specific offers that match your personal interests, based on the information that you shared with us and the information we have collected through cookies or similar technology about your use of Middle Point's websites/social media/blogs.
- To improve our products and services (including those offered through our website and web portal) or to resolve (technical) problems with using our website or services.

We will only process your personal data for the purposes listed above. If we use your data for any other (closely related) purposes, we will notify you of this - in accordance with the law - and we will take the necessary measures.

What personal data do we process?

Upon registration:

- Name and address details, email address and other contact information.
- Date and place of birth, age, gender.
- Curriculum vitae (CV), information about education, internships and work experience.
- Information on training and courses and/or tests that you have taken yourself or with us.
- Information about availability and leave.
- Information regarding preferred and existing primary and secondary conditions of employment.
- Other information which is or might be of importance in the context of assessing your suitability, for example references and testimonials, photo and video (introduction) - on a voluntary basis.

When you can start working for us, or when you started working for us or have worked for us:

- Nationality, Citizen Service Number (BSN number), proof of identity, work permit.
- Other information related to personnel, payroll and absenteeism registration.
- Information required for registration and relocation, if applicable.
- Information regarding safety passport (medical examinations, certificates relating to the Safety and Health and Environment (SHE) Checklist for Contractors (SCP), if required to carry out the work.

How does Middle Point handle your personal data?

Carefully, securely and confidentially. That is how we handle your personal data. Middle Point has drawn up a policy for this.

Supervision of the processing of personal data

The regulations on protecting your personal data are laid down in the General Data Protection Regulation. The Dutch Data Protection Authority safeguards compliance with this legislation.

If you believe that we are not complying - or not complying sufficiently - with the provisions set out in this Privacy Statement, please let us know. You are also free to file a complaint with the Dutch Data Protection Authority. You can contact them at:

Bezuidenhoutseweg 30
2594 AV Den Haag
0900-2001201

Security

Middle Point takes appropriate technical and organisational measures in order to protect your privacy and the confidentiality of your data. We take security measures to prevent misuse of and unauthorised access to personal data, such as: access control, firewalls, secure servers and encryption of certain types of data, such as financial information and other sensitive data.

Middle Point also has internal policies to ensure the security of your personal data and all our employees are made aware of the applicable privacy legislation and the security risks associated with collecting, processing and storing personal data.

In addition to securing our systems, we don't want everyone within Middle Point to have access to all your data. Our systems have been configured in such a way that employees can see only the information for which they are authorised.

Middle Point is NEN 4400-1 certified

The NEN 4400-1 standard imposes requirements for testing and assessing employment agencies and (sub)contracting companies. This standard focusses on the correct payment of taxes and social contributions and the right of employees to work in the Netherlands.

The Dutch Labour Standards Foundation [Stichting Normering Arbeid] keeps a register of companies that have been certified based on the above. Middle Point is certified annually and is listed in this register.

Middle Point is SCT certified

SCT stands for Safety and Health Checklist Temporary Employment Agencies and is intended to give temporary workers who carry out risky work every opportunity to work safely and healthily.

With this objective in mind, DNV GL helps organisations to improve the safety and sustainability of their operations. DNV GL is one of the largest certification body worldwide.

Reporting incidents

If it unexpectedly appears that something has gone wrong with the protection of your personal data, or we suspect that this is the case, we will report this to the Dutch Data Protection Authority. If the personal data breach could possibly have adverse effects or adverse consequences for you, we will notify you know as soon as possible.

Confidentiality

We assume that your data are always confidential in nature. Every employee of Middle Point is therefore obliged to maintain confidentiality. This also applies to any third parties who have been engaged by Middle Point or are otherwise appointed to perform work. Persons charged with carrying out technical work on our systems are also bound to secrecy. In short, everyone who has access to your data is charged with a duty of confidentiality.

Retention periods

Middle Point does not store your data any longer than is necessary for the purposes for which your data are processed and then is permitted by law. How long certain data are stored depends on the type of data and the purposes for which they are processed. The retention periods can therefore be different for each purpose.

Disclosing personal data to third parties

We expressly do not disclose your personal data to third parties, unless this is necessary in the context of performing our agreement, if this is required by law or if you have given us your consent to do so.

Middle Point may also be required to disclose personal data based on legislation and regulations, on the basis of a court order, or if there has been fraud or abuse. In these cases, Middle Point will provide its full cooperation.

Transferring your data to countries outside the European Union

Middle Point does not transfer your data to companies or branches in a country outside the European Union, unless a model agreement has been concluded for this purpose or if you have signed a statement in which you consent to the transfer.

Personal contact with Middle Point

A lot of the contact between you and Middle Point is via telephone, forms, email or social media. Any personal data that you provide as a result will be stored if they are necessary for us to perform our services.

Other ways of contact

Increasingly, customers are contacting Middle Point via email, social media (Facebook, Twitter) or via www.middlepoint.nl. (Mobile) chat functions are also used and of course, a lot of information is also exchanged via letters and forms. The initiative to make contact can come from you but also from Middle Point. Any personal data you provide to us can be processed by Middle Point for purposes such as answering your questions, sending you offers or improving the quality of our services.

Visiting Middle Point's website

When you visit our website, we store your IP address, visitor data and cookies. The following sections explain how we use this information.

What do we do with your IP address?

Everyone who uses the internet, has an IP address, even if you use the internet via your mobile phone. Without an IP address, you cannot use the internet.

What do we do with your visitor data?

Middle Point's website tracks general visitor data, such as the most visited pages. This information allows us to further optimise the layout of our website. These data can also be used to put tailored information on our website. In this way, we can continue to improve our services. We also register how visitors browse through Middle Point's website. These data are only stored and processed internally. They are used for statistical analysis of visitor behaviour and to show you the right content.

What do we do with cookies?

We use cookies on this website. A cookie is a small, simple file which is transmitted by any of the pages of this website and which your browser saves to the hard drive of your device, i.e. computer, tablet, telephone, etc.

With your permission, we place "tracking cookies" on your device. We use these cookies to keep track of which pages you visit, in order to build a profile of your online behaviour. This profile is not linked to your name, address, email address and such, but only to tailor website content to your profile, so that it is relevant to you as much as possible.

The American company Google places cookies via our website, as part of the "Analytics" service. We use this service to record the visitors to our website and obtain reports on how they use the website. Google may supply these data to a third party if it is legally required to do so or if another party processes that data on Google's behalf. We do not have no influence on this. The data that are collected by Google are anonymised as much as possible and your IP address is expressly not provided. The data are transferred to and stored by Google on servers in the United States.

What are your rights?

When Middle Point processes your personal data, you have certain rights according to the applicable legislation. Your rights are explained below.

We will notify you when we process your personal data

Before processing your data, Middle Point will provide you with information regarding our identity, the purposes and manner in which we process your data and the rules that are applicable, your rights and how you can exercise them.

This information may be omitted if you are already aware of the processing of your data or if it is impossible for us to communicate with you or if this would require a disproportionate effort.

Right to access

If you are registered with Middle Point and you would like to see which of your personal data we hold, you can use your 'right of access'. However, we would like to ask you to indicate specifically what personal data you wish to receive.

Right to rectification

You have the right to rectify data if your data are incorrect or incomplete. You also have the right to rectify data if the data are not relevant for the purpose for which we process them, or if your data have been processed in breach of a legal provision.

We will notify any third party or parties that have received your data from us of any rectification, unless this is impossible or would require a disproportionate effort.

The right to erasure

You also have the right to have certain data deleted. For example, if your data are no longer needed for the purposes for which we have received them, if you object to the processing or if your data have been processed unlawfully. However, we can't always delete all the requested data, because we may be obliged to keep certain data. This can include your Citizen Service Number (BSN), or a copy of your identity document if you are working for us or if have worked for us.

Right to restriction of processing

You also have the right to restrict the processing of your data. The right to restriction means that we are (temporarily) not allowed to process or change your personal data. This will be the case if you are contesting the accuracy of the data, if you are of the opinion that the personal data are no longer necessary for the purposes or if you are of the opinion that the processing of your personal data by Middle Point is unlawful.

Right to object

You have the right to object against the processing of your personal data by Middle Point if your personal data are used for purposes other than necessary for performing an agreement or for fulfilling a legal obligation. For example, if you do not want us to use your personal data to make you personal offers.

Right to data transfer

If you have provided us with your personal data, in certain cases you have the right to have your data transferred. This means that we will provide your data in a structured, common and machine-readable manner to you, when you request us to do so.

Exercising your rights

If you wish to make use of your rights, you can contact us at any time via the contact details below or by sending us a letter with your name, address and telephone number. We will respond to your request within one month.

We ask that you identify yourself by means of a valid proof of identity. That way, we can ensure that we are giving the personal data to the right person.

Excessive requests for information may be rejected. This will be the case if your requests for information are more than average and more than necessary.

About this Privacy Statement

Middle Point can update this Privacy Statement. The last update was on 21 May 2018. You will always find the most recent version on www.middlepoint.nl.

If you have any questions or comments about our Privacy Statement, please feel free to contact us:

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1014 AK Amsterdam
AVG@middlepoint.nl

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Maarten van Haren
On behalf of the management board of Middle Point BV