

## Privacy Statement

### 1. Introduction

Middle Point values your privacy and the protection of your personal data. We process your personal data to provide you with the best possible service and to carry out our work efficiently and effectively.

We handle your data with care and ensure appropriate security measures. You can be confident that your personal data is in safe hands at Middle Point and that we comply with applicable laws and regulations, including the General Data Protection Regulation (GDPR).

### 2. To what does this Privacy Statement apply?

This Privacy Statement applies to all personal data processed by Middle Point in the context of its services. This applies to both fully and partially automated processing, as well as to manual processing of personal data contained in a file or intended to be contained in a file.

### 3. Who do we process personal data from?

Middle Point processes personal data of everyone with whom we have contact or who visits our website. This includes (potential) contractors, secondees, clients, suppliers and business partners. We also process personal data of contact persons of our (potential) clients, suppliers and business partners.

If your organisation or company provides personal data of employees to us, you are required by law to inform those employees about this. You may provide this Privacy Statement to them.

### 4. Who is responsible for processing your personal data?

Middle Point is the processing controller of your personal data and is registered with the Chamber of Commerce under RSIN-number 850152197, located at Contactweg 62, 1014 BW Amsterdam.

As processing responsible party Middle Point determines which personal data are processed, for which purposes and in which manner this is done.

### 5. What personal data do we process?

At registration

- Name, address, place of residence, e-mail address and other contact details
- Date of birth, age, gender
- Curriculum vitae (CV), education, work experience and certifications
- Details of training and tests you have taken
- Availability, leave and working conditions
- Any references, certificates, passport photos or video introductions (voluntary)

If you work or have worked through Middle Point

- Nationality, BSN number, copy of ID card and work permit (if applicable)
- Data relating to salary, staff and absence records
- Registration and relocation details (if applicable)
- Safety passport, medical examinations and certifications such as VCA (if required for your work)

### 6. What do we use your personal data for?

Middle Point only processes your personal data if there is a legal basis for doing so, such as the execution of an agreement, a legal obligation or your explicit consent.

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We process personal data for:

- Mediation, secondment and recruitment & selection
- Personnel and payroll administration
- Career development and training purposes
- Contract management and compliance with legal obligations
- Marketing and communication, such as informing you about our services
- Website optimisation and statistical analyses

### 7. AI policies and automated decision-making

Middle Point uses artificial intelligence (AI) and automated decision-making in certain processes to improve services and work more efficiently.

We can use AI for:

- Matchmaking between candidates and vacancies, based on relevant experience and qualifications
- CV analysis and automated recommendations, to identify suitable candidates faster
- Optimisation of recruitment processes, such as automated pre-screening of applications
- AI usage within communication channels such as WhatsApp from cm.com, where automated assistants or chatbots may assist in answering questions, collecting information, or scheduling interviews. These interactions support the recruitment process and do not replace human decision-making. This tool is integrated with our Applicant Tracking System (ATS)

AI is never used for fully automated decision-making without human intervention, especially for decisions that may have legal consequences or significantly affect you. If AI is used, we will ensure that:

- The processing is transparent and explainable
- You have the right to object to AI-based decisions
- Sensitive or discriminatory data is not processed automatically

Want to know more about how Middle Point applies AI? Contact us using our contact details at the bottom of this Privacy Statement.

### 8. Security and confidentiality of your personal data

Middle Point takes appropriate technical and organisational measures to protect your personal data from unauthorised access, loss or misuse. Among others, we employ:

- Access control: only authorised staff have access to your data
- Secured servers, firewalls and encryption
- Internal privacy training and confidentiality obligations for employees and external parties

### 9. Supervision and incident reporting

The Personal Data Authority (PDA) monitors compliance with the GDPR. If you believe Middle Point is not processing your data correctly, you can file a complaint with the PDA.

In the event of a data breach that may adversely affect your privacy, we will inform you as soon as possible.

### 10. Provision of personal data to third parties

Middle Point only shares your personal data if this is necessary for the execution of an agreement, on the basis of a legal obligation or when you have given your explicit consent.

Middle Point may be obliged to provide data to competent authorities in the event of laws or regulations, a court ruling or in the event of fraud or abuse.

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### 11. Use of cookies and website data

When you visit our website, we record data such as your IP address, visitor behaviour and cookies.

Tracking cookies: with your permission, we use cookies to analyse your website behaviour and better tailor our content to your preferences.

Google Analytics: we use this service to collect statistics on website use. Your IP address is anonymised and the data is processed according to the GDPR.

More information about our cookie policy can be found on our website

### 12. Your rights and how to exercise them

You have the following rights in relation to your personal data:

- Right of access: You can request to see what data we process about you
- Right to rectification: You can have incorrect or incomplete data corrected
- Right to data erasure: You can request deletion of your data, unless we are obliged to keep it
- Right to restriction of processing: You can request to stop processing temporarily in certain cases
- Right to object: You can object to processing, e.g. for marketing purposes
- Right to data portability: You can request a copy of your data in a structured and commonly used format

You can exercise your rights by contacting us. We will respond to your request within one month and ask you to identify yourself.

### 13. Transfer of data outside the EU

Middle Point does not transfer your personal data to countries outside the EU unless this is covered by statutory model contracts or you have given your explicit consent.

### 14. Contact and updates to this Privacy Statement

Middle Point may update this Privacy Statement in the event of changes to legislation or our policies. You can always find the most recent version at <http://www.middlepoint.nl>.

Should you have any questions or comments about this Privacy Statement, please contact us:

Middle Point B.V.  
Contactweg 62  
1014 BW Amsterdam  
[AVG@middlepoint.nl](mailto:AVG@middlepoint.nl)

Amsterdam, 3 June 2025

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