

# Job Candidate Privacy Statement

From the world's leading food and agribusiness bank

## Introduction

As a potential job candidate, you can be secure in the knowledge that we do everything we can to protect your Personal data. We comply with all the relevant laws and regulations, including but not limited to, the Australian *Privacy Act 1988* (Cth).

This Privacy Statement is for the Hiring and Selection process and explains how your Personal data is processed when applying for a job at Rabobank. When we use the terms Rabobank, we, our, us; for the purposes of the Hiring and Selection process, it means each member of the Rabobank Group based in Australia, being:

- Coöperatieve Rabobank U.A. (Australia Branch)  
(ABN 70 003 917 655)
- Rabobank Australia Limited (ABN 50 001 621 129)

## What do we mean exactly by 'Personal data' and processing Personal data?

- Personal data means any data that relates to an identified person or an individual who can be reasonably identified. This includes an opinion, whether the data or opinion is true or not; or recorded in a material form or not. In the context of a job candidate this may include:
  - Your name, address, date of birth, gender, telephone number and email address;
  - Your Curriculum Vitae (CV) and cover letter;
  - Links to your public profiles on websites such as LinkedIn.
  - Information disclosed in your application for a role with us;
  - Email communications and your written and verbal interactions with us;
  - Any other information you tell us about yourself during the Hiring and Selection process;
  - Information you authorise us to collect from third parties (for example, reference checks, criminal record checks).
- Processing Personal data means any operation that is performed on Personal data. This includes the collection, recording, storage, organisation, alteration, use, transfer, disclosure (including the granting of remote access), transmission or deleting of Personal data. When you apply for a job with us, we collect, use and retain your Personal data. We do this, among other things, to verify that you hold the appropriate qualifications and are suitable for the position.

## Who holds your personal data?

Your Personal data is processed in our HR systems (Workday, Harver and XRef) by Rabobank. If your application for employment with Rabobank is successful, your Personal data, including all application and assessment documents collected during the application process will form part of your employee record with us.

## How do we collect your Personal data?

We have three ways of collecting your Personal data:

- You provide this yourself, or
- Through a third party/third parties (for example, referees or an external recruitment agency)
- We also collect data (including contact details) ourselves through resources such as CV databases or LinkedIn. We do this if we think you might be interested in working for us. If the recruiter contacts you, they will tell you where they found your details. In addition, they will ask you for permission to use these details to contact you regarding a Rabobank job opening or event in the future. You can change or withdraw your consent at any time using the contact details in this Statement.

## Principles and purposes of using Personal data relating to a job application

We process your Personal data to:

- Enter into an employment contract with you and perform the activities governed by this employment contract;
- Based on your express consent – which, of course, can be withdrawn at any time;
- If we have a legal obligation to do so; or
- Based on our legitimate interests.

If we need to process your Personal data for any reason that is not listed above, we will, before doing so, explain why we need to use it in that way and ask for your permission.

## For what purposes do we process Personal data?

We process Personal data for the following purposes:

### a. Human resources

We require your Personal data in order to be able to properly conduct our Hiring and Selection process. This includes assessing

whether you are suitable for the position and if we would like to invite you for an interview (which naturally, would involve assessing your application and using your contact details to communicate with you). We do this in relation to the position you applied for, but also to provide you with information about other job vacancies. Another reason might be to produce a temporary access card, which you may require in order to enter the building. Rabobank has an Inclusion and Belonging Policy because we want our employees to reflect our wider society and this is reflected in our hiring and selection practices.

#### **b. Health, safety, security and ethics (including pre-employment screening)**

Like all other financial institutions in Australia, we require future employees to undergo identity verification and background checks. We are required by law to do so. Our screening procedures apply to all candidates who are potential Rabobank employees. A positive outcome of the background check is a condition for getting hired and to confirm you are of good and honest character. All candidates to be screened are subject to the same procedure, which consists of the following two stages:

- **Stage 1:** If we intend to enter into an employment contract with you, we will ask you to complete a self-declaration form; this form advises you that we will be gathering Personal data on you. This may also include the opinions of employers or clients you have had over the past two-five years regarding your experience and character.
- **Stage 2:** We will initiate our pre-employment screening with a third party provider (currently First Advantage) to complete this screening process. They will also ask for your consent as part of this process.

We may also process Personal data we obtain from other third parties for this purpose, including former employers (through references we received from you) and recruitment agencies. We may also consult public sources during the job application process, including publicly accessible and professional social media (if this is relevant to the position and is specified in the job advert).

We also record Personal data in order to protect the interests of our employees, visitors, the bank and the financial sector. We do this, among other things, through the camera security and visitor registration systems, when you attend our premises at any stage during the Hiring and Selection process.

#### **c. Business reports and analysis and organisational development**

We may process your Personal data to create business reports, surveys and analyses. We may also merge the various data we possess to improve the Hiring and Selection reports (for example, the number of job openings, number of candidates and the time it takes to fill these vacancies). The results of the analyses and the resulting recommendations are de-identified and unable to be traced back to you.

#### **d. Legal requirements**

We collect Personal data relating to you based on specific

domestic and international laws and regulations and based on our policy framework in place. Pursuant to these legal requirements we are required to verify your identity and your working rights.

#### **e. Protection of job candidates' vital interests**

We may process Personal data in order to protect your vital interests, e.g. your medical details. Suppose you are in acute danger (and have lost consciousness) and are no longer able to give consent for your medical details to be shared. In this case, these details are vital in order to be able to provide you with immediate assistance.

## Do we also process Sensitive Personal data as part of the Hiring and Selection process?

By 'Sensitive Personal data', we mean data that may relate to a person's health, criminal record, and data regarding race or ethnic background. Only those at Rabobank who need to access this Sensitive Personal Data will be able to do so (for example, HR, Safety and Wellbeing and Workplace and in some instances Compliance).

We participate in the ASIC/APRA external registers and the Conduct Background Checks for the financial industry and may process criminal data for this purpose. The purpose is to protect the interests of financial institutions, of you as a job candidate, and of our clients. If you ask us to record Sensitive Personal data relating to you or are disclosing this data yourself, we will only process this data if there is a clear purpose, there are grounds to do so, and this is necessary for the purpose. Sensitive Personal data may also be processed, for example in photographs or video recordings of you. This includes any pictures you might have enclosed with your CV, recordings of video interviews (with your consent), as well as camera footage recorded of you on entering the building. We process this camera footage solely for the protection of our property and our employees, and for other security reasons.

## How do we handle your Personal data?

Your Personal data is processed exclusively by employees who require access to this data on account of their position. The employees who are involved in your application process are bound by confidentiality. We only reuse data if the original objective corresponds to the new objective. For example, you apply for a position and that particular position doesn't suit you, but we think you are suitable for another/similar position. Once we have obtained your permission, we will include you in the process for the other/similar position.

## How do we deal with third parties?

Sometimes we engage the services of third parties, which process Personal data on our behalf. This includes external

recruitment agencies and research companies. Where we have engaged a third party to act as our agent, that third party can only hold or process your Personal data for the same purpose for which we collected it. Furthermore, we will only hire the services of such a third party or parties if they have implemented the appropriate security measures and guarantee confidentiality through contractual arrangements as an example.

Your Personal data may also be shared with related entities of Rabobank, which includes entities within Australia and overseas (including but not limited to the Netherlands, United Kingdom, U.S. and New Zealand), and may be stored on overseas databases operated by Rabobank Group or its related entities. We will ensure that any such sharing of Personal Data is done in a manner compliant with the same obligations we have towards you.

We may disclose your Personal data to:

- Our service providers that we have engaged to provide a service to us related to your application for employment;
- Third parties to conduct pre-employment checks;
- Courts, tribunals, and regulatory authorities; and/or
- Any other person or organisation that you have authorised us to disclose your information to.

## How long do we keep your details?

If you created an online profile with us, you will be able to use it again for other job applications at Rabobank in the future.

We will retain your personal data for as long as it is required to achieve the purposes set out in this Privacy Statement. We will review all information that we hold regularly to determine whether it is necessary to retain your personal data. If we consider that it is no longer necessary to hold certain personal data, we will delete or destroy it.

If your job application was unsuccessful, we will delete your Personal data within 4 weeks after the position has been filled. This includes all application details uploaded into Workday, e.g. your job application letter, CV, and the results of background checks and/or assessments. If we do need to retain your Personal data for a longer period of time, e.g. for future job vacancies, we will ask for your consent at the time when you submit your application in our careers portal. You can withdraw your consent at any time via email to [human.resources@rabobank.com](mailto:human.resources@rabobank.com).

## What rights do you have in relation to your Personal data?

### Right of access

You may ask us to view the Personal data we have stored in relation to you, including your public online details and your uploaded CV and cover letter.

### Right of correction

If any information we hold about you is incorrect, incomplete, or if any of your personal data changes, you may request that we correct that information to ensure that the details we hold about you are correct and up to date.

### Right to deletion

You can ask that Personal data recorded in relation to you be deleted if you object to this data being processed. This might be the case, for example, if the processing is unlawful or no longer necessary for the purposes for which it was collected.

### Right to restrict processing

In some cases, you may request that the processing of your Personal data be restricted. This means that a smaller amount of data is processed (this is the case, for example, when your CV is updated).

### Right not to be subject to automated decision-making

'Automated decision-making' refers to decisions made by computers rather than people. Rabobank is permitted under the law to make automated decisions, including profiling. We currently do not use automated decision-making in the job application process.

### Right to object

You have the option to object to the processing of your Personal data. In this case, we will make a reassessment in order to verify that it is accurate that your data can no longer be used for this purpose. We will also always inform you of our decision. If the decision is unacceptable to you, you can submit a complaint via our contact options below.

### How long we will take to respond to your rights request?

If you submitted one of the requests described above, we will respond to your request as soon as is reasonably practicable and within one month of receipt.

Depending on the number of requests received and the complexity of the request(s), the period may be extended but will not exceed two months in total from receipt. We will, of course, keep you updated on the progress of your request. You may be asked to further specify your request. We may also ask you to provide proof of identity because we want to make certain that we are providing data to the right person. In some cases we may not be able to fulfil your request. For example, we will not delete the data if there is a legal obligation to retain it. We will notify you if this is the case.

## Where can you submit a rights request and have your question or complaint addressed?

If you have a rights request or have questions/complaints/feedback about the processing of Personal data during the Hiring and Selection process, you can contact the Human Resources team, who can be reached via email [human.resources@rabobank.com](mailto:human.resources@rabobank.com).

If you find the response to be unsatisfactory you may contact the Privacy Officer, who can be reached via email [Sydney.privacy@rabobank.com](mailto:Sydney.privacy@rabobank.com).

If you not satisfied with the outcome of your complaint, you can submit a complaint to the Office of the Australian Information Commissioner (OAIC). You can contact OAIC as follows:

- Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au); or
- Telephone: 1300 363 992 or, if calling from outside Australia, +61 2 9284 9749; or
- Writing: to The Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001

## Can we amend our Job Candidate Privacy Statement?

The Job Candidate Privacy Statement may be modified from time to time. If there is new data to be processed, we will amend the Statement accordingly. You will be able to find the most up-to-date version of our Job Candidate Privacy Statement on our website.

Latest Version: April 2022