

Job Candidate Privacy Statement

From the world's leading food and agribusiness bank

Introduction

At Rabobank we want to attract candidates that reflect the communities we support, as part of our Inclusion, Equity and Belonging Policy.

This Privacy Statement explains how your Personal data is processed by Rabobank as part of our Hiring, Selection and Onboarding processes.

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

Important definitions

When we use the terms **Rabobank, we, our, us**, for the purposes of the Hiring, Selection and Onboarding processes, 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).

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, Selection and Onboarding processes; and
- Information you authorise us to collect from third parties (for example, reference checks and/or 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 (i.e. process) your Personal data. We do this, among other things, to verify that you hold the appropriate qualifications and are suitable for the position.

Sensitive Personal data means Personal data that includes information or an opinion about an individual's health, criminal record, and data regarding race or ethnic background. Only Rabobank employees 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).

Who holds your personal data?

Your Personal data will be held and processed in our HR systems 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 collect your Personal data in the following ways:

- You provide your Personal data to us yourself;
- Through a third party/third parties (for example, referees or an external recruitment agency, online databases or job seeking websites where you have shared your Personal data such as LinkedIn)

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;
- If we have a legal obligation to do so; or
- If we have a legitimate interest in doing so.

If we need to process your Personal data for any reason that is not listed above, we will ask you for permission first.

What do we use your Personal data for?

We process your Personal data for the following purposes:

a. Human resources

We require your Personal data to conduct our Hiring Selection and Onboarding processes. This includes assessing whether you are a suitable candidate for the position, to contact you for interviews and to provide you with temporary building access.

If you are offered a position, we will retain your data as part of your employee record.

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

We use your Personal data and/or Sensitive Personal data (including data we receive from third parties) to carry out identification verification, references, and background checks. This includes criminal background checks. A satisfactory background check is a pre-requisite for receiving an employment offer. We may also review your publicly available Personal data including any information posted on social media.

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 informs you that we will be collecting your Personal data. This may also include the opinions of your past employers or clients you have had over the past 2-5 years regarding your experience and character.
- **Stage 2:** We will initiate our pre-employment screening with a third-party provider to complete this screening process. They will also ask for your consent as part of this process.

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, Selection and Onboarding processes.

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 entering the building as mentioned above. We process this camera footage solely for the protection of our property and our employees, and for other security reasons.

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, Selection and Onboarding 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 may collect your Personal data in order to ensure compliance with any laws or regulatory requirements, including under any Anti-Money Laundering and Counter-Terrorism financing legislation or to comply with any immigration requirements.

e. Protection of candidates' wellbeing

We may use your Personal data to protect your wellbeing, e.g. your medical details. For example, if you are in acute danger (and have lost consciousness) and are unable to give consent for your medical details to be shared, we may share your Personal data with appropriate authorities to provide you with assistance.

How do we process your Personal data?

Your Personal data will only be processed by employees who require access to this data as part of their employment and as part of the screening process. All employees, including those involved in your application process, are bound by their duty of confidentiality. We may reuse the Personal 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.

Who do we share your Personal data with?

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.

We may also share your Personal data with other related entities within the Rabobank Group. This 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 party agencies to conduct pre-employment checks;
- Courts, tribunals, and regulatory authorities in accordance with our legal and regulatory obligations; and/or
- Any other person or organisation that you have authorised us to disclose your information to.

How long do we keep your details?

We will keep your personal information secure and in accordance with our data retention policy.

If you are unsuccessful in the hiring process, we will retain your Personal information for a period of two years from the date of your last application in accordance with this Statement. The primary purpose of retaining this Personal Data is to identify and communicate to you, any future job vacancies that fit your profile.

If you are successful in your application, all personal information, including application and assessment information, will become part of your employee file and will be subject to the relevant data retention laws for employees.

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 Curriculum Vitae 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

If you do not wish for your Personal Data to be kept as outlined in this Statement, you may request we delete this data by emailing human.resources@rabobank.com. Our consideration of your request will be subject to, among other things, our legal and regulatory obligations to retain certain data.

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.

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 will we 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.

If you find the response to be unsatisfactory you may contact our Privacy Officer, who can be reached via 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; or
- Telephone: 1300 363 992 or, if calling from outside Australia, +61 2 9942 4099; or
- Writing: The Office of the Australian Information Commissioner, GPO Box 5288, Sydney NSW 2001

Alternatively you may lodge a complaint with:

Make a Complaint (afca.org.au) The Australian Financial Complaints Authority (AFCA) independently assists consumers and small businesses to make and resolve complaints about financial firms.

- Email: info@afca.org.au or
- Telephone: 1800 931 678 or if calling from outside Australia 0061 1800 931 678 or
- Writing: Australian Financial Complaints Authority, GPO Box 3, Melbourne – VIC 3001

Changes to this 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: 31 July 2024