

## Privacy Policy

This Privacy Policy will explain how the personal data of visitors (“**Users**” or “**you(r)**”) of <https://harver.com/> and/or <https://careers.harver.com/> and/or any mobile Harver app (the “**Website(s)**”) will be collected and processed by Harver. Harver only collects your personal data for a specific and justified purpose described in this privacy policy. Personal data is not processed further in a way that contradicts the purpose for which the personal data was obtained.

### 1. Who handles your personal data?

Harver B.V. is the “Controller” with respect to any personal data that you provide via the Websites. The Controller is the legal person who determines the purposes and means of the use (processing) of your personal data. We have our place of business at Jollemanhof 20, 1019 GW Amsterdam Netherlands and we are listed in the trade register under number 66145880. If you want to contact us, please use [privacy@harver.com](mailto:privacy@harver.com) for this purpose. For the purpose of this privacy policy we will refer to ourselves as “**Harver**”, “**we**”, “**us**”.

We (can) use certain sub-processors, but these sub-processors only process (use) the that of personal data that is strictly necessary for these sub-processors to complete their specific task or service. We only provide your personal data, subject to data processing agreements, which state that the sub-processors must keep your personal data confidential, that the data cannot be used for their own purposes and that all information will be used in accordance with applicable privacy legislation, including strict provisions in the light of data security.

We reserve the right to transfer your personal data to a country outside the European Economic Area or international organisation. If so, we will ensure that the appropriate, suitable and required safeguards and transfer mechanisms shall be in place. You are entitled to receive a copy of any documentation showing the suitable safeguards that have been taken by making a request via [privacy@harver.com](mailto:privacy@harver.com)

### 2. The reasons, the type, the legal basis and the retention period of the processing of your personal data.

#### Applying for a job at Harver.

If you apply for a job at Harver, we will ask you to provide us with your personal data to i) facilitate the entire job application procedure, ii) create statuses, notes and planning related to your job application and, iii) have e-mail communications with you about your application, if applicable. We process your personal data based on our legitimate interests for recruitment purposes. We are required to inform you that withholding personal data in your job application may provide you with a disadvantage in comparison to other applicants who are applying for the same role.

In processing your personal data, we have balanced our legitimate interests against your fundamental rights and freedoms. Where necessary we have taken appropriate measures to limit implications and prevent unwarranted harm to you. For example, i) we will only use your personal data for the specific mentioned purposes and ii) we only ask/use the personal data that we absolutely need from you for the application process. We may ask you the following

personal data in the job application procedure:

- Name;
- Home address;
- References;
- E-mail address;
- Phone Number;
- Picture;
- Cover Letter;
- Resume;
- LinkedIn Profile;
- Date of birth (age);
- Level of education.

We will store your personal data up to four (4) weeks after the application process has ended. If you provide Harver permission to store your personal data for a longer period, we will store your personal data up to one (1) year. If you are hired by Harver, your personal data will be processed in accordance with (statutory) rules for employment relationships and relevant retention periods

Your personal data may also be processed by LinkedIn if you allow for the 'Apply with LinkedIn' functionalities. LinkedIn may use cookies. You can find their privacy policies on the following websites: <https://www.linkedin.com/legal/privacy-policy>.

#### Screening new Harver Employees

Harver reserves the right to screen new employees based on our legitimate interest. Depending on the specific job, Harver employees may come in contact with large amounts of personal data for which Harver is a data processor. Due to this fact and the fact that Harver (strives to) maintain(s) security certifications, it is of the utmost importance that Harver employees maintain a very high level of integrity. Furthermore, for Harver employees that come in regular contact with personal data, Harver needs to verify that (new) employees have the credentials (diploma's/work experience) as indicated in the application process.

In this process, we have balanced our interests against your fundamental rights and freedoms. Where necessary we have taken appropriate measures to limit implications and prevent unwarranted harm to you. For example, the exact level of screening will depend on specific job of the employee and the amount of personal data the employee will come in contact with. Depending on the specific job, the screening may consist of the following elements and we can process the following personal data:

- The verification of references;
- The validation of the authenticity of identity papers;
- The validation of diploma's;
- Conducting an integrity survey;
- Requesting a Certificate of Conduct (VOG);
- Personal data as stipulated under 'Applying for a job at Harver'.

We will not store your personal data longer than is necessary for the above stated purposes. If you are not hired by Harver at the end of the application procedure, we will not retain your

personal data for longer than four (4) weeks after the termination of the procedure. If you have given permission to keep your personal data longer, we will retain your data for a maximum of one (1) year after the application procedure has ended to be able to offer your other interesting job vacancies at Harver.

Our screening Partner is Validata Group B.V, we will therefore provide your personal data to this company. Validata Group B.V will process your personal data as an individual data controller.

#### Submitting a question to Harver via the 'Contact Us' form.

On the Website, Users have the possibility of submitting a question to Harver. We will process your personal data based on the performance of a contract (to reply to your enquires). When submitting a question to Harver on the Website, we will ask you the following information:

- First name;
- Last name;
- Phone Number;
- E-mail address;
- Your question.

#### Requesting a demo for the Harver Platform via the Website.

Are you interested in Harver products and want to request a demo? We will process your personal data based on the performance of a contract (to reply to your demo request/provide you with a demo). When requesting a demo for the Harver Platform on the Website, we will ask you the following information:

- First name;
- Last name;
- Phone Number;
- Company E-mail address;
- Interest Level;
- Indication of new hires next year;
- Additional message.

#### Visiting the Website as a User.

As a Website visitor, based on our legitimate interests, we may analyze trends, administer the Website, measure Users' activity on the Website and to gather demographic information about our User base.

For the above-mentioned purposes, we may use Google Analytics, a web analytics service provided by Google, Inc. ("**Google**"). Google Analytics uses "cookies", which are text files placed on your computer, to help us analyze how Users use the Website. Google will not associate your IP address with any other data held by Google.

The gathered information will be transmitted to and stored by Google on servers in the United States. Google and all its subsidiaries, such as Google Analytics, participate in the Privacy Shield Framework and are committed to the Privacy Shield Principles in the processing of

personal data transferred from the European Union to the United States. You may refuse the use of cookies by selecting the appropriate settings on your browser.

In addition, Harver has signed a data processing agreement with Google. This agreement contains arrangements between Harver (as the controller of the personal data) and Google (as the data processors of personal data). These arrangements represent for which purposes personal data may be acquired, what security measures need to be taken and which form of oversight Harver may exercise as controller of the personal data.

For tracking purposes and monitoring purposes of the Website, we may also place a cookie from Hubspot. We will only place this cookie with your consent. If you haven't provided us with consent the Hubspot cookie will not be placed.

The cookies may store the following information:

- Your IP-Address;
- Information about your use of the Website;
- Device and browser;
- IP-address;
- Requests and responses sent from and to your device;
- Behaviour on our website.

If you do not want to have cookies stored on your computer or want to remove cookies that already have been stored, you can arrange this via the settings screen in your browser settings. The adjustment of these settings differs per browser. On the website '[all about cookies](#)', it is clearly explained how to arrange this.

#### Subscription to our newsletter.

You want to stay informed about Harver products and services? Great! When subscribing to the Harver newsletter on the Website, you will have provided Harver with consent to send you our newsletter. We will ask you the following information:

- E-mail address.

#### Acquiring relevant (free) recruitment content.

Harver offers certain free information (e-books) for you to read in respect of interesting topics in the HR industry. You may freely acquire (download) these e-books. In this case we will process your personal data based on our legitimate interest, due to the fact that Harver and the User will have joined into a customer relationship.

According to the Dutch Telecommunications Act, you will be provided with an opt-out to prevent us from sending you email content about related topics. If you do not opt-out, you will be able to opt-out in every e-mail communication we will send you. When acquiring relevant (free) recruitment content from the Website, we will ask you the following information:

- First name;
- Last name;
- Company E-mail address.

### 3. What are your (data subject) rights?

Under the privacy legislation (GDPR), you have a number of rights as a data subject. This chapter of the privacy policy state the data subject rights you have and how you can invoke these rights.

#### *The right to be informed*

You have the right to know if we use (process) your personal data.

#### *The right of access*

If we indeed use (process) your personal data, you have the right to access your personal data and retain a copy.

#### *The right to rectification*

If your personal data is incorrect, you have the right to ask us to rectify your personal data. We will rectify your personal data accordingly.

#### *The right to erasure ('to be forgotten')*

If you want us to delete your personal data, you have the right to request us to delete your personal data. We will delete your personal data, unless we have a legal obligation to keep processing your personal data.

#### *The right to restrict processing*

If you are of the opinion that the processing of your personal data is unlawful, or your personal data is incorrect, or you require the personal data for legal claims after the retention period, or you have objected to the processing of your personal data, you can request us to restrict your personal data. In this case we cannot process your personal data unless your grant us permission.

#### *The right to data portability (when processing under consent or performance agreement)*

You can request us for an export of all the personal data that is processed by Harver. We will provide you with an export of your collected and processed personal data.

#### *The right to object (when processing under legitimate interest).*

In this event we will not process any of your personal data upon your objection, unless we can provide you with compelling reasons to continue the processing of your personal data.

If you wish to make use of your (data subject) rights as mentioned in in this paragraph, please send your request via e-mail to [privacy@harver.com](mailto:privacy@harver.com). You will receive a substantiated reply within one (1) month after your request.

### 4. Protection of personal data.

We have taken appropriate technical and organizational security measures in order to protect your personal data against loss, misuse, alteration and/or destruction. Although we exercise reasonable care in providing secure transmission of information between your equipment and our systems, we cannot ensure or warrant the security of any information transmitted to us

over the internet.

Access to relevant personal data is only granted to those authorized employees who require access to the relevant personal data for performance of their work.

## **5. Questions and complaints**

If you have any questions or complaints about this privacy policy, please contact our Data Protection Officer at:

Harver B.V.  
Attn: DPO  
Jollemanhof 20  
1019GW Amsterdam  
The Netherlands

or [privacy@harver.com](mailto:privacy@harver.com)

You may also lodge a complaint at the Dutch DPA: [Autoriteit persoonsgegevens](#)

*This privacy policy has been updated on February 13, 2019.*