

# Job Candidate Privacy Statement

From the world's leading food and agribusiness bank

## Introduction

This Privacy Statement is part of the Hiring and Selection process and explains how your Personal Information is processed when applying for a job at Rabobank.

As a potential job candidate, you can be secure in the knowledge that we do everything we can to protect your Personal Information in accordance with relevant laws and regulations both in New Zealand and overseas.

Rabobank has an Inclusion, Equity and Belonging Policy because we want to attract candidates that reflect the communities we support.

We will only ask for information that is relevant to your suitability for the particular role you have submitted an application.

## Important Definitions

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 New Zealand, including:

- Coöperatieve Rabobank U.A. (New Zealand Branch)
- Rabobank New Zealand Limited

**Personal Information:** means any information about an identifiable individual and includes information about an individual who can be reasonably identified. This includes an opinion, whether the information or opinion is true or not; or recorded in a material form or not. In the context of hiring and selecting a job candidate, 'Personal Information' 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 recruitment process; and
- Information you authorise us to collect from third parties (for example, reference checks and/or criminal record checks).

**Processing of Personal Information:** means any operation that is performed on Personal Information. This includes the

collection, recording, storage, organisation, alteration, use, transfer, disclosure (including the granting of remote access), transmission or deleting of Personal Information.

**Sensitive Personal Information:** means information that includes information or an opinion about an Individual's health (for example vaccination status), criminal record, and information regarding race or ethnic background. Only Rabobank employees who need to access this Sensitive Personal Information will be able to do so (for example, HR, Workplace and in some instances Compliance).

If you ask us to record Sensitive Personal Information relating to you or are disclosing this information yourself, we will only process this information if there is a clear and lawful purpose, if there are grounds to do so, and if this is necessary for the purpose.

## Who holds your Personal information?

Your Personal Information will be held by Rabobank New Zealand Limited and is processed in our HR system (Workday) by Rabobank. If your application for employment with Rabobank is successful, your Personal Information, 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 Information?

We collect your Personal Information in the following ways:

- You provide your Personal Information to us yourself; or
- You give your consent for us to access your Personal Information through a third party/third parties (for example, referees or an external recruitment agency); or
- We collect your Personal Information either directly, or through recruitment agencies, from online databases or job seeking websites where you have shared your Personal Information such as LinkedIn.

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

We process your Personal Information:

- To enter into an employment agreement with you and perform the activities governed by the employment agreement;

- Based on your express consent;
- If we have a legal obligation to do so; or
- If we have legitimate interests in doing so.

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

### What do we use your Personal Information for?

We may use your Personal Information for the following purposes:

#### a. Human resources

We require your Personal Information in order to conduct our Hiring and Selection process. 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 may retain your data as part of your employee record.

##### Pre-employment screening

We may use your Personal Information and/or Sensitive Personal Information (including information we receive from third parties) to carry out identity 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 Information 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 agreement with you, we will ask you to complete a self-declaration form; this form informs you that we will be collecting your Personal Information. This may also include the opinions of your past employers or clients you have previously worked with regarding your experience and character.
- **Stage 2:** If we are satisfied with the responses we receive under Stage 1, 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.

#### b. Business reports and analysis and organisational development

We may use your Personal Information to create business reports, surveys and analyses. We may also merge the various information 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.

#### c. Legal requirements

We may collect your Personal Information 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.

#### d. Protection of job candidates' wellbeing

We may use your Personal Information 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 Information with appropriate authorities to provide you with assistance.

Sensitive Personal Information 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 process your Personal Information?

Your Personal Information will only be processed by employees who require access to this information 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 Information if the original purpose is directly related to a new purpose you have consented to. For example, you apply for a position and that particular position doesn't suit you, but we think you are suitable for another 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 Information with?

Sometimes we engage the services of third parties, which process Personal Information 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 Information 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.

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

## **We may also disclose your personal information to:**

- Our service providers that we have engaged to provide a service to us related to your application for employment;
- Third parties 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 retain your personal information in accordance with our legal and regulatory requirements. When we no longer have a legal basis for using your data, we will delete, destroy or de-identify your Personal data.

In other situations, if we do need to retain your Personal Information 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 [fm.nz.humanresources@rabobank.com](mailto:fm.nz.humanresources@rabobank.com)

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

### **Right of access**

You may ask us to view the Personal Information 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 or incomplete, or if any of your personal information 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**

Subject to our legal and regulatory obligation to retain some data, 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 to object**

You have the option to object to the processing of your Personal Information. In this case, we will make a re-assessment in order to verify that it is accurate that your information 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 seek access to or correction of your personal information, we will respond to your request as soon as is reasonably practicable and within 20 working days of receipt.

Depending on the number of requests received and the complexity of the request(s), the period may be extended in accordance with the Privacy Act 2020. We will keep you updated on the progress of your request. You may be asked to provide more details about your request. We may also ask you to provide proof of identity because we want to make certain that we are providing information to the right person. In some cases we may not be able to fulfil your request. We will notify you if this is the case.

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

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

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

If you not satisfied with the outcome of your complaint, you can submit a complaint to The Office of the Privacy Commissioner (OPC) on the details below:

- Email: [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz); or
- Web: <https://www.privacy.org.nz/your-rights/making-a-complaint/complaint-form/>; or
- Telephone: 0800 803 909

### **Changes to this Candidate Privacy Statement**

The Job Candidate Privacy Statement may be updated from time to time. If there is new information 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: September 2023