

# Rabobank New Zealand

## Job Candidate Privacy Statement

### Introduction

This Privacy Statement explains how your Personal Information is processed by Rabobank as part of the 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 Information in accordance with relevant laws and regulations both in New Zealand and overseas, and that we will only ask for information that is relevant to your suitability for the particular role for which 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); and
- Rabobank New Zealand Limited

**'Personal Information'** means any information (including opinions) relating to an identified individual, or from which an individual could be identified. In the context of hiring, selecting and onboarding 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 hiring, selection and on boarding process; and
- Information you authorise us to collect from third parties (for example, reference checks and/or criminal record checks).

**'Processing of Personal Information'** As a candidate, we will process (i.e., collect, use and retain) your Personal Information for various purposes, including verifying qualifications/candidate screening etc.

**'Sensitive Personal Information'**, includes information about a candidate's health or criminal record, and information regarding race or ethnic background. Only Rabobank employees who need to access Sensitive Personal Information will be able to do so (for example, HR, Workplace and in some instances Compliance).

### Who holds your Personal Information?

Your Personal Information will be held by Rabobank and will be processed in our HR system (Workday). 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 publicly.

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

We process your Personal Information:

- To assess your suitability for the role for which you have applied;
- To enter into an employment agreement with you and perform the activities governed by the employment agreement;
- Based on your express consent; and
- where we have a lawful purpose to do so and it is necessary for that purpose.

If we need to use your Personal Information for any other reason, we will ask you for permission first.

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

We may process your Personal Information for the following purposes:

#### a. Human Resources

We process your Personal Information to complete our hiring, selection and onboarding 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.

#### b. Pre-employment screening

We may use your Personal Information (including information we receive from third parties) to carry out identity verification, check references, and complete education, criminal and credit background checks prior to issuing an employment offer. We may also review your publicly available Personal Information including any information posted on social media.

All candidates are subject to the same screening 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.
- c. Business reports and analysis and organisational development

We may use your Personal Information to prepare internal reports, surveys and analysis. 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 these reports and the resulting recommendations are de-identified so they cannot be traced back to you.

#### d. Legal requirements

We are required to collect Personal Information relating to you by specific New Zealand and international regulations and our internal policies. Examples of this are being required to verify your identity, asking for evidence of your right to work in New Zealand, or establishing the suitability of a preferred candidate for a Bank Director or Senior Manager role as required by our regulators.

#### e. Protection of job candidates' wellbeing and Bank security

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

Your 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 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(s).

## 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.

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.A). Your Personal Information may also 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 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 Personal Information?

We will retain your Personal Information 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 Information is to identify and notify you of 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 Information?

Subject to our legal and regulatory obligations, you have the following rights in relation to your Personal Information.

### Right of access

You may ask to view the Personal Information we have stored about you, including your public online details and your CV 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

If you do not wish for us to store your Personal Information, you can request that we delete it by emailing [fm.nz.humanresources@rabobank.com](mailto:fm.nz.humanresources@rabobank.com).

### Right to restrict processing

In some cases, you may request that the processing of your Personal Information 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 right to object to the processing of your Personal Information. In this case, we will make a re-assessment to verify that it is accurate that your information can no longer be used for this purpose. We will inform you of our decision. If the decision is unacceptable to you, you can submit a complaint using the contact details below.

### How long will we 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 email [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, by emailing [newzealand.privacy@rabobank.com](mailto:newzealand.privacy@rabobank.com).

If you are not satisfied with the outcome of our decision, you could submit a complaint to The Office of the Privacy Commissioner (OPC) using the following methods:

- 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: 1 September 2024