

## Privacy Statement for Job Applicants

We highly appreciate your interest in working for the IMC group of companies ("IMC"). When you apply for a job at IMC (for example through our Career webpage) IMC processes your personal data and uses cookies and similar technologies. We aim to carefully and safely use your personal data in line with applicable privacy rules and regulations.

We want to make sure that you understand what kind of information we will be collecting from you and how it will be used. In this Privacy Statement we describe who we are, how and for which purposes we process your personal data during the recruitment procedure, how you can exercise your privacy rights and all other information that may be relevant to you.

We did our best to provide you with all information in a clear and readable format. However, if you have any questions about our use of your personal data after reading this Privacy Statement, you can of course always contact us through the contact details provided below.

For information on how we use cookies and similar technologies, please read our Cookie Statement.

Finally, we would like to point out that we are continually developing and improving our recruitment procedure and the Career webpage. If this brings about any changes in the way we process personal data, this will be reflected in this Privacy Statement. We therefore recommend that you regularly take notice of the Privacy Statement for any modifications.

### Who are we?

IMC is a global group of companies of which its headquarter is established in The Netherlands. IMC in The Netherlands is the controller for the processing of your personal data. You can contact us via the contact details provided at the bottom of this Privacy Statement.

### Personal data submitted by you

If you apply through our Career webpage you will be required to submit personal data through our Career website as part of your application, otherwise we will not be able to process your application. We may also obtain your application and personal data from third parties, such as recruitment firms if you have submitted your application and your personal data through them. Your personal data will be used by IMC to assess your skills and interest in career opportunities at IMC and to process your application.

## For which purposes do we process your personal data?

We have two legal grounds for processing your personal data: your consent and IMC's legitimate interest. We collect and process your personal data for the purposes of the recruitment and selection procedure and to ensure its efficient and effective functioning.

Below you will find what kind of personal data we collect and for what purposes:

### **1. To inform you and communicate with you with regard to your job application or any (future) vacancies or events**

If you have shown interest in a position at IMC, we store your personal data in our recruitment database. We use the data in this database to communicate with you and to determine whether your qualifications and profile meet the requirements of that specific vacancy. We may also use your personal data to inform you about any other (future) vacancies or to invite you for recruitment activities or events.

For this purpose, we process your contact details (including: name, address, phone number and email address), recruitment information (such as your resume, employment history, education history etc.) and correspondence with IMC with regard to job applications (including references provided by you).

We process your personal data for this purpose on the basis of your consent and our legitimate interest. We process your personal data to find suitable candidates. If you have shown interest in IMC we can contact and inform you when we organize an event or when we may have a suitable vacancy for you.

### **2. To answer your questions**

If you get in touch with us and provide us with your personal data, for example through the contact form on our Career webpage, we will use your personal data in order to reply and answer your question(s) and to correctly address you.

For this purpose, we may process your contact details (including name, phone number and email address), your correspondence with us with regard to your question(s) and all other personal data which are necessary to answer your question.

We process your personal data for the above purpose on the basis of your consent.

### **3. To assess and evaluate you during the recruitment procedure**

During the recruitment procedure, your suitability for our vacancies will be assessed. The processing of your personal data is necessary for IMC to assess if your profile, background and capacities meet IMC's requirements for our vacancies and to find suitable candidates. Without the processing of your personal data we cannot assess and evaluate your suitability for any vacancy after you have submitted your application.

For this purpose, we may process your contact details (including: name, address, phone number and email address), recruitment information (such as your resume, employment history, education history, backgrounds check etc.), correspondence with IMC with regard to job applications (including references provided by you) your test and assessments results and information and communication gathered during the interviews.

We process your personal data for the above purpose on the basis of your consent and our legitimate interest.

#### **4. To enter into an employment agreement**

If we offer you a position at IMC, we will process your personal data to prepare and process an employment agreement. We use your personal data for the conclusion and execution of your employment agreement. We will store your personal data in our HR database. If you are an independent contractor, we will process your personal data the same way as we would if we would have entered into an employment agreement with you.

For this purpose, we process your contact details (including name, address, phone number and email address), date of birth, gender, civil status, nationality, photographs, citizen service number, ID card or passport details, declaration of employment status, chamber of commerce and VAT details, recruitment information (such as employment history, education history details), results of background check, tests and assessments, information gathered during interviews, job and position data, work permit details, availability, terms of employment, tax details, payment and bank account details, insurance details.

We process your personal data because it is necessary for entering into (and the performance of) an employment contract with you.

## **How long do we keep your personal data**

The retention period of your personal data may differ depending on the category of the data and the purpose for which IMC uses the data.

### **Purpose 1 and 3**

For the purposes as mentioned under 1 above, IMC will retain your personal data for a period of one year after the application process has ended. This way we can keep in contact for any future (recruitment) events or other vacancies. Also it is in your and our best interest that IMC keeps these data, as it won't be necessary to provide these data again or assess the data again when you would apply a second time for a position at IMC within the year. Our HR and Recruitment Department will be able to process your application more efficiently, so that both, you and IMC, will have clarity about the next steps in the application process without unnecessary delays.

**Purpose 2**

For the purpose as mentioned under 2 above, IMC will retain your personal data as long as necessary to answer your questions. As soon as your questions have been answered and no follow up correspondence is required or desired, your personal data will be deleted from our systems.

**Consent for purposes 1, 2 and 3**

In case you have given us your consent, IMC will retain your personal data for a period of two years after the application process has ended for the purposes under 1, 2 and 3. This way we can keep in touch for a longer period, for instance regarding future (recruitment) events and new vacancies or job applications, if that would also be in your best interest. Please note that you can give your consent freely when you apply. Your decision will under no circumstances impact the recruitment procedure.

**Purpose 4**

For the purpose as mentioned under 4, your personal data will be retained for different periods, as long as necessary for the relevant purposes and any specific legal obligations regarding data retention. When it is no longer necessary for IMC to keep the personal data or when mandatory minimum retention periods have expired, your personal data will be deleted from our systems.

In any event IMC will limit the use and retention of your personal data to that which is required and relevant for the related purposes. All other personal data will be removed from our systems.

## Who has access to your personal data?

All our employees involved in your specific recruitment procedure have access to your personal data, but only to the extent necessary to fulfil their respective tasks. These employees are for example our recruiters, HR employees, the relevant (hiring) manager and other employees that are involved in your application process.

Your personal data may be accessed by other relevant IMC departments, including but not limited to Finance, Legal, Risk & Compliance and Information Security, but only to the extent necessary to fulfil their respective tasks. Your personal data may be transferred to other IMC offices outside the European Union or European Economic Area. IMC takes measures to ensure that your personal data are adequately protected. Without a legitimate purpose we will not provide your personal data to recipients for their own purposes.

The following external parties may have access to your personal data where relevant for the provisioning of their services to IMC, including but not limited to:

- Recruitment agencies
- Assessment centres
- Travel agencies
- Background screening companies

If your personal data are transferred to an external party in a country that does not provide an adequate level of protection of personal data, IMC will take measures to ensure that your personal data are adequately

protected. In other cases, your personal data will not be supplied to external parties, except when required by law.

When an external party processes your personal data solely on our behalf and under IMC's strict instructions, it acts as a data processor. In that case we enter into an agreement with such a data processor concerning the processing of personal data (a so called Data Processing Agreement). In this agreement we include, at a minimum, the obligations to safeguard that your personal data are solely provided to the data processor to provide services to us.

## **How do we secure your personal data?**

We take appropriate technical and organizational measures against unauthorized or unlawful processing of your personal data and against accidental loss or destruction of, or damage to your personal data. IMC has implemented physical, administrative, and technical safeguards to protect your personal data.

## **How can you exercise your privacy rights?**

You have the right to request access and rectification of your personal data, and under certain conditions, erasure of personal data. In addition, you may also have the right of restriction of processing concerning your personal data, the right to object to processing as well as the right to data portability of your personal data.

To invoke the above mentioned rights please contact us by using the contact details at the bottom of this Privacy Statement. Please keep in mind that we may ask for additional information to verify your identity.

## **Can you withdraw your given consent?**

If you no longer want us to process your personal data you have given consent for, you can always withdraw your consent. Please keep in mind that withdrawal does not have retrospective effect. You can contact us by using the contact details at the bottom of this Privacy Statement.

## **Questions and complaints**

If you have any questions about the way we process your personal data, please read this Privacy Statement first. For additional questions or complaints, please contact IMC's Legal Department in Amsterdam:

IMC Trading  
Attn: Legal Department  
Amstelveenseweg 500  
1081 KL Amsterdam  
The Netherlands

Phone: +31 20 7988400  
Email: AmsLegal@imc.com

You can lodge a complaint with your local data protection supervisory authority when you have a complaint about the use of your personal data by IMC. For example, if you believe that we do not use your personal data carefully, or because you have sent us a request to access or rectification of your personal data and you are not satisfied with our reply or we did not reply in a timely manner.

## **When was the last modification made to this Privacy Statement?**

This Privacy Statement applies since 25 May 2018. The last modifications to this Privacy Statement were made on 22 May 2018.