



Privacy Statement for Job Applicants

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1. Introduction

Your personal data is in safe hands with Banco Rabobank International Brasil S.A. ("Rabobank Brazil). As a potential job candidate, you must be secure in the knowledge that we do everything we can to protect your data. We comply with all the relevant laws and regulations, which may include but is not limited to the Brazil General Data Protection Law (LGPD), Law 13.709/2018. This Privacy Statement for the Recruitment and Selection process (referred to below as the 'R&S process') explains how your data is processed.

In this Privacy Statement we will use the following terms:

1. Personal Data: are data that directly or indirectly identify an individual. Some examples are your name, address or bank account. Rabobank handles Personal Data of Holders who participate in selection processes to fill Employee vacancies, as defined below.
2. Holder of Personal Data: any individual, whether a customer, a party related to a customer, supplier, even if sporadic or a business partner as well as any other individual whose Personal Data is processed by Rabobank .
3. Processing of Personal Data, Processing or Process: any act that is related to the processing of Personal Data, such as collecting, storing, using, sharing or removing the Personal Data that is in our records.
4. Employee concerns to:
 - a) Employee or former employee of a Rabobank Group entity, including temporary workers who work or worked under the direct supervision of Rabobank including through Business Partners or Suppliers (for example, contractors); or
 - b) Executive or non-executive director of Rabobank Brasil or (ex) member of any committee or the board of directors of Rabobank Brasil.

1.1 Banco Rabobank International Brazil is bound by the applicable rules regarding Personal Data Processing, but not limited to them:

- I. Brazilian General Data Protection Law (LGPD, Law 13.709/2018); and
- II. Rabobank Privacy Code
- III. Rabobank Privacy Code for Employee Data
- IV. Política De Privacidade
- V. Política de Privacidade de Colaboradores

1.2 What do we mean exactly by 'Personal Data' and the Processing of this data?

- a) Personal Data refers to data which relates to you personally, either directly or indirectly. This might include:
 - Your name and address, date of birth, sex, telephone number and email address
 - Your CV and cover letter
 - Links to your public profiles on websites such as LinkedIn
 - Optional: a photograph and/or audiovisual job application video
- b) Processing refers to any activity involving Personal Data. When you apply for a job with us, we collect, use and retain your personal data. We do this, among other things, to verify that you hold the qualifications required for the position.

1.3 Whose Personal Data do we Process, and how do we Process it, during the job application process?

This Privacy Statement applies to all Processing of the Personal Data of candidates and potential candidates as part of the R&S process at Banco Rabobank International Brazil ("Rabobank Brasil"). The data is Processed in the HR system in Brazil by or on behalf of Rabobank Brasil. If you are hired by Rabobank Brasil, you will be subject to the Privacy Statement for Employees.

1.4 Who is responsible for Processing my Personal Data?

Banco Rabobank International Brazil is responsible for Processing all Personal Data processed. For further contact details, see item 8.

1.5 How do we obtain your Personal Data?

We have two ways of acquiring your Personal Data:

- You provide this yourself or through a third party (either through referees or an external recruitment agency).
- We also collect Personal Data (including contact details) ourselves through resources such as CV databases. We do this if we think you might be interested in working for Banco Rabobank International Brazil. If the recruiter contacts you, they will tell you where they found your details. In addition, they will ask you for permission to use these details to contact you regarding a Banco Rabobank International Brazil job opening or event. It goes without saying that you can change or revoke your consent at any time.

2. Principles and purposes of processing personal data relating to a job application

We Process your Personal Data:

- a) based on your express consent – which, of course, can be revoked at any time;
- b) if we have a statutory obligation to do so;
- c) in order to enter into an employment contract with you and subsequently perform this contract;
- d) based on a legitimate interest on Banco Rabobank International Brazil's part.

We do not knowingly collect Personal Application Data from any individual which are under the age of 14. If we learn that we have collected Personal Data relating to a child, we will take reasonable steps to delete it.

2.1 For what purposes do we Process Personal Data?

Generally, Personal Data should only be Processed for the business purposes for which it was originally collected (original purpose). Personal Data may be reused by Rabobank for a legitimate business purpose different from the original business purpose (secondary purpose) only if the original purpose and secondary purpose are closely related and provided that the legitimate and specific purposes for the new Processing and the preservation of the rights of the Holder, as well as the fundamentals and principles set forth in this Statement and in the Privacy Code.

Rabobank may process Personal Data for the following purposes, in accordance with the provisions of the Rabobank Privacy Code when:

- a) Intend to carry out or take measures to analyze/enter into a contract with a vacancy candidate;
- b) Need to comply with a legal obligation to which Rabobank is directly or indirectly subject;
- c) Need to protect the vital interests of job applicants at Rabobank and their dependents on the data in question;
- d) Protect the legitimate interests of Rabobank as long as these interests do not prejudice the interests, rights and fundamental freedoms of candidates for vacancies at Rabobank, data subjects in question;
- e) Protection, in relation to candidates for vacancies at Rabobank, of the regular exercise of their rights or provision of services that benefit them;
- f) There is consent;
- g) Any other circumstance allowed by the LGPD and the European General Data Protection Rule- (EU) 2016/679 (GDPR), as per the opinion of the person responsible for the Processing of Personal Data (article 41 of the LGPD), also known as the Data Protection Officer or designated in the governance of Rabobank as the Privacy Officer (hereinafter simply designated as Data Officer).

Furthermore, Rabobank also handles Personal Data on dependents of candidates for vacancies at Rabobank if:

- a) Data were provided by the applicant;
- b) Data Processing is reasonably necessary for the execution of a proposal or employment contract; or
- c) Processing is required or permitted by applicable local laws.

Furthermore, we Process Personal Data in order to be able to properly conduct our R&S process. This includes assessing whether you are suitable for the position and whether we would like to invite you for an interview.

We may also use data for this purpose which we obtain from third parties, including former employers (through references we received from you) and recruitment agencies. We may also consult public sources during the job application process, including publicly accessible and professional social media (if this is relevant to the position and is specified in the job advert). 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 system.

We collect data relating to you based on specific domestic and international laws and regulations. Certain positions may require background checks to determine if you are qualified for the position and meet all regulatory requirements.

Furthermore, we may process data in order to protect your vital interests, e.g. your medical details. Suppose you are in acute danger (and have lost consciousness) and are no longer able to give consent for your medical details to be shared. In this case, these details are vital in order to be able to provide you with immediate assistance.

3. Do we also Process special categories of Personal Data?

By 'special categories of Personal Data', we mean various types of Sensitive Data. This data may relate to personal data on ethnic racial origin or religious belief, political opinion, membership of the trade union or the organization of a religious, philosophical or political nature, given regarding health or sexual life, genetic or biometric data, when linked to a natural person. If you ask us to record special categories of personal data relating to you or are disclosing this data yourself, we will only process this data if there is a clear purpose, there are grounds to do so, and this is necessary for the purpose. Special categories of Personal Data may also be processed, for example photographs or video recordings of you. This includes any pictures you might have enclosed with your resume, as well as camera footage recorded of you on entering the building. We process this camera footage solely for the protection of the property of Banco Rabobank International Brazil and its employees, and for other security reasons.

4. How do we handle your Personal Data?

Your Personal Data is used exclusively by employees who require access to this data on account of their position. The employees who are involved in your application process are bound by confidentiality. We only reuse data if the original data is related to the new purpose.

Rabobank treats Sensitive Data (relation of categories defined above) only to the extent necessary to serve the applicable business purposes and for regulatory requirements, based on specific domestic and international laws and regulations, taking into consideration one (or more) specific purposes.

5. How do we deal with third and related parties?

Sometimes we engage the services of third parties, which Process Personal Data on our behalf. This includes external recruitment agencies, research companies among others. We can only engage third parties if this suits the purpose for which we Processed your Personal Data and this is sufficiently reliable. 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. If your application process includes an assessment, we will notify you in advance and will only save the report to your job application file once you have approved the accompanying report.

In addition, Rabobank is part of the Rabobank Group. The Processing of Personal Data is only carried out by Rabobank and, eventually, by other companies of the Rabobank Group in the context of their commercial and personnel management activities in the cases provided for in the Local Privacy Code, and in accordance with the Legal provision of the General Protection Law Data Protection Rule (LGPD) and, as applicable and not conflicting, by the General Data Protection Rule (GDPR).

Rabobank Group includes Rabobank and several companies headquartered abroad, to which Rabobank may share or transfer its data, in accordance with applicable legislation and regulations, under the supervision of the Data Protection Officer.

6. How long do you keep my Personal Data?

If you created an online profile with us, you can use it again for other employment applications at Rabobank in the future. If you join Rabobank, our record retention policy applies to all Personal Data we hold about you.

We may store candidate data for the purposes stated in this document (including for your consideration whether your skills are suitable for other opportunities within Rabobank).

In any case, we will retain your applicant's data not more than necessary for the possibilities of new opportunities and no more than necessary after the completion of the job application process, unless you are hired by Rabobank, in which case a different retention period may apply, observing in both cases data retention periods and respecting regulatory and/or legal requirements, which may require that data relating to the Know Your Employees ("Know Your Employees") procedure be retained for many years.

After the retention period, the Personal Data will be: a) Securely erased or destroyed; b) Anonymized; or c) Transferred to a file (unless prohibited by law).

7. What rights do you have in relation to your personal data?

If Personal Data is incorrect, incomplete or not processed in accordance with applicable law or this Statement, the Data Subject may have their Personal Data rectified, deleted, blocked or their Processing restricted (as applicable). The Personal Data Subject must send his request to the Data Protection Officer, through the contacts provided on the Rabobank website. In addition, the Data Subject can: a) Oppose the Processing of your Personal Data based on reasons considered legitimate by it, which will be evaluated by the Data Protection Officer, but may result in an impediment, on the part of Rabobank, in the interest of the contracting of the candidate; b) Oppose the receipt of marketing communications; c) Request the restriction of the Data Processing in case of dispute about its veracity or when the data subject opposes the Processing; d) Request the restriction of the Processing if it is considered illegal; and e) Request the generation of a readable file by electronic means containing your Personal Data and, where technically possible.

7.1 Right of access

You may ask us to view the data Banco Rabobank International Brazil has stored in relation to you, including your public online details and your uploaded CV and cover letter.

7.2 Right of rectification

If your data is incorrect, incomplete or in violation of the law, you can request us to have it rectified.

7.3 Right to be forgotten

You can ask that 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.

7.4 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).

7.5 Right not to be subject to automated decision-making

'Automated decision-making' refers to decisions made by computers rather than people. Banco Rabobank International Brazil is permitted under the law to make automated decisions, including profiling. We currently do not use automated decision-making in the job application process.

7.6 Right to data portability

Data which has been provided to us based on an agreement and/or with your consent may be transferred to a third party. This can be facilitated only if it is technically feasible. Banco Rabobank International Brazil will transfer the data you have provided yourself in a structured and readable format.

7.7 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. If the decision is unacceptable to you, you can submit a complaint to the Data Protection Officer at Banco Rabobank International Brazil or Data Protection Authority.

7.8 Procedure

If you submitted one of the requests described above, we will respond to your request within one month of receipt. Depending on the number of requests received and the complexity of the request(s), the period may be extended by another two months. We will, of course, keep you updated on the progress of your request. If the data you provided also contains third-party data, such third party may be requested in advance whether they object to their data being processed. You may be asked to further specify your request. We may also ask you to provide ID because we want to make certain that we are providing data to the right person. In some cases we may not be able to honor your request. For example, we will not delete the data if it is of significant importance to us or if there is a statutory obligation to retain it. We will notify you if this is the case.

8. Where can I address my question or complaint?

For questions or complaints about the processing of personal data, you can contact the division to which you applied or via support in the link [Fale Conosco - Rabobank](#).

If this still fails to produce an acceptable result, you can contact the data protection officer, who can be reached also via the link above. You can also ask questions or submit a complaint to the Data Protection Officer, Alexandre Baczynski, available from Monday to Friday, via email PrivacidadeBrasil@rabobank.com.

Our address details are:

- **Banco Rabobank International Brazil S/A**
- Address: **Av. Das Nações Unidas, Brooklin Novo, São Paulo, SP, Brazil**
- N°: **12995, 8º Floor**
- ZIP Code: **04578000**

9. Can we amend our Privacy Statement?

The Privacy Statement may be modified from time to time. If there is new data to be processed, we will amend the Privacy Statement accordingly. You will be able to find the most up-to-date version of our job applicants Privacy Statement on our website, along with previous versions of this Statement.