

PRIVACY REGULATIONS

ArboNed B.V.

Version 2.0
Classification: public

ArboNed B.V. is registered with the Chamber of Commerce under number 30120994
ArboNed B.V. is part of HumanTotalCare B.V.

20210331

1

The logo for ArboNed, featuring the word "ArboNed" in a bold, black, sans-serif font. The letter "o" is lowercase, and the "N" is uppercase. A thick blue horizontal line is positioned directly beneath the text.

Contents

PRIVACY REGULATIONS 1

Introduction 3

Part A 4

- Personal data processed by ArboNed 4**
- Purposes 4**
- Basis 4**
- Retention period 5**
- Access to personal data 6**
- Provision of personal data to third parties 6**

Part B 8

- Data of visitors to the ArboNed website 8**
- Data of suppliers of goods and/or services to ArboNed 9**
- Data of ArboNed employees 9**
- Applicant data 9**
- Personal data processing for commercial communications 10**

Part C 11

- Security 11**
- Provision of personal data to third parties 11**
- Your rights 11**
- Complaints settlement - where to go with complaints 12**
- Cookies 13**
- Contact details 13**
- Where can you find these privacy regulations? 13**
- Impiry of the Privacy Regulations 13**



Introduction

These privacy regulations govern the processing of personal data, including special personal data, by ArboNed B.V. in connection with our services. Personal data processing comprises the collection, storage, recording, modification, retrieval, consultation and destruction of personal data.

ArboNed is an innovative service provider in the field of work, vitality and health. We advise and support employers in the implementation of a comprehensive health management policy and help to keep staff fit for work.

To this end, we offer customised solutions based on an extensive portfolio of products and services in the field of prevention, sickness absence and interventions with the aim of keeping staff competent, motivated and healthy.

We handle the personal data we process with care and in accordance with the applicable laws and regulations, including the General Data Protection Regulation ('GDPR')¹. This means, for example, that ArboNed B.V.:

- informs you in a comprehensible and transparent manner about how and for what purposes personal data is processed;
- personal data is only processed for specific purposes, based on one of the principles stated in the GDPR.
- takes appropriate security measures to protect personal data against loss and theft.
- informs you of your rights with regard to the personal data processed by ArboNed B.V.

As a healthcare provider, ArboNed processes personal data of the its customers' staff, which it is required to do by law. When ArboNed provides staff with care, it creates an occupational health file for them, containing personal data. These privacy regulations explain how we deal with the personal data of the employees to whom we provide care in this context. You can read this in Part A of these privacy regulations.

In addition to employee personal data, our organisation also processes a number of other groups of personal data, including personal data of our suppliers and personal data of visitors to our website. Part B explains how we deal with these other groups of personal data.

Part C contains a number of general provisions outlining how we protect your personal data and who to contact if you have any questions about these privacy regulations. These privacy regulations are established and managed under the responsibility of the management of ArboNed.

¹ The Dutch name of the General Data Protection Regulation (GDPR) is Algemene Verordening Gegevensbescherming (AVG). Our privacy regulations are also available in Dutch via our website.

Part A

Personal data processed by ArboNed

In its role of service provider, ArboNed processes the following personal data.

Personal data, including:

- Name and address data
- Email address
- Telephone number
- Date of birth
- Gender
- Nursing address of the sick employee
- Employee ID²
- Citizen service number (BSN).

Special personal data, including:

- Health data, such as the date of the sickness report, the date of the return-to-work report, the probable duration of the absence, whether any of the safety net provisions of the Sickness Benefits Act apply, whether the employee falls under the Work and Income (Capacity for Work) Act or whether a sick employee has been involved in a traffic accident and health data that is collected via questionnaires that the employee completes for the purposes of (preventive) care provision.
- Special personal data that the company doctor processes about your health and that is necessary for the assessment of your fitness or unfitness for work, sickness absence management and rehabilitation, such as the nature and cause of the illness and the progress of the treatment, as well as any data required for providing preventive care to the employee.
- Confidential employee data registered by the confidential counsellor in the confidential counsellor file, i.e. actions undertaken, findings and advice given.

Purposes

ArboNed processes the aforementioned personal data to be able to perform its services for its customers in the field of total health management, working conditions, sickness absence management, rehabilitation, interventions, prevention, health checks, tests and vaccinations. We may also process your personal data for scientific and research purposes, such as compiling reports or statistics. Before we use your data for research purposes, we anonymise this data, so that it can no longer be traced back to you. We also conduct research to improve the care provided to employees. The reports and statistics for an employer or its participation body contain only data at group level and do not contain personal data that can be traced back to an individual.

ArboNed ensures that personal data is stored securely and is not accessible to unauthorised individuals.

Basis

ArboNed processes the personal data because it is obliged to do so under the Medical Treatment Agreement Act and the Working Conditions Act. In addition, ArboNed is obliged to process the personal data on the basis of contractual obligations with employers. ArboNed processes only the personal data that it needs for the performance of these statutory and contractual obligations, such as the compilation of an occupational health file for each employee counselled.

² This means the Employee ID, or any other coding specific to an employee that replaces the Citger Service Number as a key value, as described in the National Absenteeism Standard ('NVS') 2017, which is endorsed by occupational health and safety services affiliated to the OVAL trade association and managed by the Sivi Foundation.

Under the Quality, Complaints and Disputes in Healthcare Act and the Use of the Citizen Service Number in Healthcare Act, ArboNed uses a client's citizen service number for the purpose of ensuring that the personal data to be processed in the provision of healthcare relates to that client.

ArboNed only obtains the necessary personal data of employees when the law requires ArboNed to do so, viz. the moment when the provision of care to an employee starts. If no care is provided, ArboNed will have no access to personal data of employees. This is safeguarded in the software that we make available to employers and employees as part of our total health management.

In addition, we may process your personal data if you give us your express consent to do so.

Retention period

Personal data that we process on the basis of the Medical Treatment Agreement Act is retained for up to 20 years after termination of your employment with your employer or after termination of the agreement between your employer and ArboNed.

In some cases we may need to keep your personal data for a longer or shorter period. ArboNed conforms to the general guidelines for the storage and deletion of medical data of the Royal Dutch Medical Association (KNMG).

Subject to the KNMG guidelines, the following principles apply to the storage and deletion of medical data:

- A. We retain your personal data for a period of 20 years after:
 - You have ended your employment with your employer.
 - Our service contract with your employer has ended.
 - Your death.
- B. In the event of exposure to hazardous substances, we will retain your personal data, depending on the substance you are exposed to and based on specific legislation, for 40 years after you have ended your employment with your employer or after our service contract with your employer has ended, or after you died or after the last change is made to your file. In special circumstances such as exposure to ionising radiation in accordance with the Radiation Hygiene Decree (Article 100), we will retain your personal data until you have reached or would have reached the age of 75.
- C. After you have left or after our service contract with your employer has ended, we may receive a request to transfer your personal data to your new company doctor or occupational health and safety service. In that case, we will transfer your personal data relating to current cases of illness to your new company doctor or occupational health and safety service, after which we will no longer retain this data. We retain personal data that is solely related to closed cases of illness for the statutory period of 20 or 40 years in the case of exposure to hazardous substances or in special circumstances such as exposure to ionising radiation in accordance with the Radiation Hygiene Decree (Article 100) until the employee has reached or would have reached the age of 75.
- D. Notwithstanding the cases mentioned under A through to C, we will retain your personal data for a longer period if the law requires us to retain your data for a longer period of time or if the need for prolonged retention of your personal data period arises from the care of a good care provider. In addition, with your explicit consent, we may retain your personal data for a longer period of time.

Access to personal data

Only employees who need access because of their duties are authorised to access personal data. They are authorised on the basis of roles, making it possible to make a strict division. Medical data that is subject to medical confidentiality can be accessed only by the treatment team.

1. In the case of absence management, the treatment team consists of the (company) doctor who is the person responsible and the process manager, or the rehabilitation and prevention consultant, or the regional team assistant, at times supplemented with a working conditions nurse.
2. In the case of examinations, the treatment team consists of the examining doctor who is the person responsible and the examination assistant and the vitality and health expert, at times supplemented with the company doctor and/or working conditions nurse.
3. In the following situations, another (company) doctor, examination doctor or another member of another treatment team will have access to the medical data: a. for the duration of replacement during illness and absence; and b. when an officer from the treatment team is succeeded by a new colleague.
4. Only the confidential counsellor has access to the registration of personal data in the confidential counsellor file with regard to the work carried out by him.
5. Access (authorisation) is granted and changed via a fixed procedure and is approved by the manager(s). The Quality and Application Management departments carry out checks on the origin of conflicting authorisations. Any conflict will be assessed by the Data Protection Officer.
6. If an employee ends his employment, the manager(s) will instruct the Application Management department to close the account, thus blocking access to the applications and, as such, personal data.
7. To examine files for quality purposes or within the framework of supervision of a treatment team officer, an appropriately appointed senior professional may have access to the (special) personal data of the employee. The senior professional always shares his findings with the treatment team officer. The aim is to give the employee the best possible service.
8. IT staff appropriately appointed by the responsible person have access to personal data in their capacity of maintenance officer of IT systems.

Provision of personal data to third parties.

Below we explain in which cases we may provide your personal data to third parties.

Your employer

We may only provide the following (personal) data to your employer:

- A. The work you are no longer or still capable of doing (functional limitations, residual possibilities and implications for the type of work you can still do).
- B. The expected duration of the absence.
- C. The extent to which you are unfit for work (based on functional limitations, residual possibilities and implications for the type of work you can still do).
- D. Any advice on adjustments, work arrangements or interventions that your employer must make for your rehabilitation.

Before we provide the above information to your employer, you will be informed about the content of the information we provide to your employer.

All other information from you that we may process will be subject to the medical confidentiality of the company doctor and will not be provided to your employer, unless you have given us your express permission to do so. The absence overviews or group reports that we may provide to your employer are anonymised and contain no personal data that can be traced to the individual.

Intervention parties

Following your verbal consent, we may provide your personal data to individuals directly involved in your treatment or occupational health counselling, to the extent necessary for the performance of their duties. For example, this may be a physiotherapist or psychologist to whom you are referred in consultation with the company doctor with a view to your rehabilitation. We only provide personal data to these intervention parties to the extent that they are authorised and we have made contractual arrangements with them about the processing of your personal data. We provide your special personal data to intervention parties after your written consent.

The UWV

We may provide personal data to the Employee Insurance Administration Institute ('UWV') insofar as this is necessary for the performance of the UWV's duties under the social insurance laws and the SUWI Act. This is the case, for example, if you apply for WIA benefit. The company doctor will then provide an up-to-date assessment of your illness and special personal data that is necessary for the UWV's insurance doctor to assess your medical situation.

Absence insurers

We will provide non-medical information to absence insurers, including information regarding the notification of illness and return-to-work and administrative information, insofar as the insurer needs this information to determine the amount of the payment.

Netherlands Center for Occupational Diseases

We are obliged by law to report occupational diseases to the Netherlands Center for Occupational Diseases for scientific and statistical purposes. The information we pass on cannot be traced back to any individual and, as such, we will not pass on any personal data about you to the Netherlands Center for Occupational Diseases.

Parties with which we cooperate for scientific and research purposes

If we cooperate with third parties for research purposes, we will only provide anonymised data to these third parties to the extent that this is necessary to carry out the research. Personal data is never provided to third parties in this context.

Part B

Data of visitors to the ArboNed website

Categories of personal data

If you visit our website and ask a question or request information from us using the contact form, the following personal data about you may be processed:

- A. Name
- B. Email address

If you subscribe to one of our newsletters through our website, we will process the following personal data about you:

- A. Name
- B. Email address
- C. Organisation you work for
- D. Job title
- E. Telephone number
- F. Address
- G. Postcode
- H. Town

If you file a complaint or send a compliment, we will process the following personal data about you:

- A. Name
- B. Address
- C. Postcode
- D. Town/city
- E. Telephone number
- F. E-mail address

If you register on our website for one of our training courses, webcasts or other online tool, we may process the following personal data about you:

- A. Name
- B. Email address
- C. Organisation you work for
- D. Job title
- E. Telephone number
- F. Address
- G. Postcode
- H. Town

Purposes

ArboNed processes the above personal data for the following purposes:

- To answer your question/complaint.
- To process your comment.
- To send you requested information.
- To provide the service you have requested.
- To process your subscription to our newsletter and to send you our newsletter.

Basis

If you ask us a question or request information, ArboNed has a legitimate interest in processing the above personal data. The processing of this data is necessary for the proper handling of your request.

If you wish to subscribe to our newsletter, we will only process your personal data with your explicit consent. You can withdraw your consent at any time by notifying us in writing.

Retention period

Personal data of visitors to the website will be deleted after your request or question has been answered, your comment has been processed or you have unsubscribed from our newsletter.

Data of suppliers of goods and/or services to ArboNed

Categories of personal data

If ArboNed enters into a business relationship with a supplier, the following personal data may be processed:

- A. First name and surname
- B. Email address
- C. Business telephone number
- D. Business address and place of residence
- E. Job title
- F. Name of the company you work for
- G. COC number and/or VAT number (if applicable)
- H. Bank account number (if applicable)

Purposes

ArboNed processes the above personal data for the following purposes:

- To process invoices
- To maintain the business network of ArboNed

Basis

ArboNed processes the above personal data for the purpose of performing agreements with suppliers.

Retention period

We retain personal data or data storage media containing personal data that is necessary to fulfil our administration obligation for the statutory retention period. Other personal data will be deleted upon termination of the relationship with our suppliers.

Data of ArboNed employees

We process personal data about our staff. The processing of this data is disregarded in these privacy regulations. At the time of employment, we explain to our employees how we handle their personal data.

Applicant data

Categories of personal data

If you apply for a job at ArboNed, ArboNed will process the following personal data about you:

- A. Name
- B. Email address
- C. Address
- D. Town/city
- E. Telephone number
- F. other information that is or maybe relevant to assessing your suitability as a candidate, such as curriculum vitae, references and certificates.

Purposes

The personal data referred to above is processed to ensure a smooth application procedure, including:

- Being able to contact you to schedule an appointment or give feedback.
- Being able to assess your profile for the position you have applied for.

Basis

If you apply for a job with us, ArboNed has a legitimate interest in processing the aforementioned personal data. The processing of these data is necessary to ensure a smooth application procedure.

Retention period

If you are not hired, your personal data will be deleted four weeks after the vacancy is filled, unless you give your consent to retain your personal data for a longer period.

Personal data processing for commercial communications

Categories of personal data

We may use your contact details to send you information about our services. In that case we will process the following personal data about you:

- A. Name
- B. Email address

Purposes

The above personal data is processed to be able to send targeted commercial communications to (prospective) customers containing information about ArboNed's services and products.

You can unsubscribe from commercial communications from ArboNed at any time.

Basis

If you are an ArboNed customer, we have a legitimate interest in processing your personal data to send you commercial communications. We believe it is important to maintain good customer relationships and to provide our customers with relevant information.

We will only send commercial communications to prospective customers after we have obtained their express consent or are permitted to so according to laws and regulations.

Retention period

Your personal data will be deleted if:

- the customer no longer has a relationship with ArboNed.
- a prospective customer has withdrawn their express consent for sending them commercial communications.
- You have unsubscribed from commercial communications from ArboNed.

Part C

Security

Effective security of your personal data is of paramount importance. ArboNed takes all reasonable and appropriate technical and organisational measures to safeguard the confidentiality, integrity and availability of your personal data.

In order to demonstrably guarantee the security of your personal data, ArboNed is ISO 9001:2015 certified and operates in accordance with ISO27001.

If a security incident does occur despite the security measures we have in place, we will take measures to minimise the impact on your privacy.

Provision of personal data to third parties

Other than stated in part A, ArboNed does not actively provide personal data to third parties. If ArboNed does provide personal data to third parties, ArboNed will always obtain your prior consent, unless this is not required by law.

Your rights

You have the right to send us written requests for:

- **Inspection of your personal data.**

You can ask us whether we process personal data about you. If that is the case, we will explain to you which personal data we process about you, how we do this and for what purposes. You can also ask us to provide you with a copy of the personal data we process about you.

- **Rectification of your personal data.**

If you believe that the personal data we process about you is inaccurate or incomplete, you can ask us to supplement or change your data.

If ArboNed has provided the personal data in question to other organisations, the data controller will inform these parties in the event of rectification of the personal data.

- **Deletion of your personal data.**

You can ask us to delete the personal data we process about you. We will delete your data upon receipt of a request to that effect without unreasonable delay if:

- the data is no longer needed for the purpose for which we processed it.
- you no longer give us permission to process your personal data.
- you object to the processing of the personal data and we have no reason to process the data any longer.
- we have processed the data for direct marketing purposes.
- the personal data should not have been processed by us ('unlawful processing').
- the law requires us to delete personal data.

If ArboNed has provided the personal data in question to other organisations, we will inform these third parties. We will indicate to these parties that we have deleted the data and that they must also delete any copy of or link to that personal data.

- **Restriction on the processing of your personal data.**

In some cases, you may wish to restrict the processing of your personal data. In that case you can ask us to limit the data processing. We will comply with such a request in the following cases:

- You believe that the data we process about you is incorrect. We will not use this personal data until the data has been checked and adjusted or supplemented if necessary.

- We should not have processed the personal data, but you do not want us to delete your personal data (completely).
- We no longer need your personal data, but you still want to be able to use this data to file a claim or initiate legal proceedings.
- You object to our processing of your personal data and we have not yet assessed this objection.

If there is a restriction on the processing of your personal data, we will only process this data with your consent. We will inform you before the restriction is lifted.

- **Transfer of your personal data.**

You can ask us to provide you with a copy of the personal data we process about you. We will provide you with a copy in a common format that can be used if, for example, you wish to transfer the data to another service provider, such as another occupational health and safety service. If this is technically possible for us and you so wish, we can transfer the personal data directly to your new service provider.

If ArboNed has provided the personal data in question to other organisations, we will inform these third parties. We will indicate to these parties that we have deleted the data and that they must also delete any copy of or link to that personal data.

You also have the right to object in writing to the processing of your personal data. If you object, please explain to us why you do not agree with the processing of your personal data.

Requests that you address to us on the basis of the above rights will be handled as soon as possible and at least within one month after receipt. We may need more time to process your request. If that is the case, we will inform you at least within one month of receiving your request. In that case, we may extend the period within which your request is handled by a maximum of two months.

If we do not comply with your request, we will notify you in writing at least within one month of receipt of the request.

Complaints procedure - where to go with complaints

If you believe that the provisions of these regulations are not complied with or your rights relating to the processing of personal data are not respected, you can file your complaint.

1. Complaint

You can file your complaint via privacy@arboNed.nl. You will receive an acknowledgment within 5 working days.

2. Your complaint will be considered

The complaint will be investigated by the responsible officer. If the responsible officer has any questions or queries, they will contact you. If applicable, they will also discuss the complaint with the people involved at ArboNed.

3. Decision

On the basis of the information collected, a decision will be made. You will receive a written reply from the responsible officer within one month of receipt of the complaint.

4. Disagree with the decision

If you disagree with the decision, you can, within one month after the decision, submit a written objection to the management of ArboNed in Utrecht. You will be invited to explain your objection. Within one month after this you will receive from the management written notification of the decision.

5. Disagree with the management's decision

If you disagree with the handling of the complaint, you can file a complaint with the Dutch Protection Data Authority in case the complaint relates to any violation of laws and regulations in the field of privacy in the processing of personal data.

Cookies

ArboNed uses cookies on its website. In our cookie statement you can read more about what cookies are and which cookies ArboNed places on its website.

Contact details

If you have any questions about these privacy regulations, our cookie statement or the processing of your personal data by ArboNed, please contact our Data Protection Officer using the contact details below.

ArboNed B.V.
FAO Data Protection Officer, M. Sanders Postal address
PO Box 85091
3508 AB Utrecht

Visiting address
Zwarte Woud
103524 SJ Utrecht

Telephone number: 030 299 62 99

E-mail address:
privacy@arbonded.nl

Where can you find these privacy regulations?

The regulations can be viewed and downloaded free of charge from the www.arbonded.nl/en website.

Entry into force of the privacy regulations

We reserve the right to change these privacy regulations. Changes will be published on our website. It is recommended that you consult these privacy regulations regularly so that you are aware of any changes.