

Schuberg Philis Privacy Statement

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1 Introduction

1.1 Who we are

This website (<https://schubergphilis.com/>) is managed by Schuberg Philis B.V. (to which we refer to as **Schuberg Philis, SBP and we**). Schuberg Philis is a Dutch-based company that helps customers in creating value, enabled by technology, and sustains it through built-up expertise. We deliver IT solutions that 100% impact the areas that are fundamental to the businesses of our customers. This is how we help our customers in achieving mission-critical transformations.

We have our registered offices in:

Offices:	Locations:
Schuberg Philis Schiphol-Rijk	Boeingavenue 271, 1119 PD Schiphol-Rijk
Schuberg Philis Rotterdam	Oostmaaslaan 53-71, 3063 AN Rotterdam

1.2 Applicable law(s) and definitions

For the purpose of this website and its functionalities, we process personal data of website visitors, applicants, and subscribers to the newsletter (to which we will refer to as **data subjects, users, visitors, and you**). For you to gain a better understanding of the terms and definitions used in this privacy statement, we have added the paragraph below. Use this paragraph to fully comprehend the contents of this privacy statement. If you have any questions about the terms and definitions used in this privacy statement, please refer to [6. Our contact details](#).

Schuberg Philis (the controller) is responsible for data processing of data subjects' personal data in accordance with the GDPR (General Data Protection Regulation). We will refer in this privacy statement to the GDPR as the applicable privacy law to which we must adhere when we are processing your personal data. As a controller we have legal obligations, under the GDPR, to handle personal data responsibly and with due care. This means that we are responsible for implementing appropriate technical and organizational measures to ensure and to be able to demonstrate that the processing of personal data is performed in accordance with the GDPR.

You, as a data subject, have various rights under the GDPR to ensure that we as data controller process your personal data responsibly and with due care. We will elaborate further on your right as a data subject in [3. Privacy rights](#).

We may amend this Privacy Statement from time to time, such as when we use different cookies or to comply with new laws- and regulations. We will inform you on substantial changes.

1.2.1 Terms and definitions:

Applicable law(s)/ GDPR:

The General Data Protection Regulation (GDPR) is the European privacy law/ legislation applicable for Europe-based companies. The GDPR is in the Netherlands referred to as the "Algemene Verordening Gegevensbescherming" (AVG).

Personal data:

Personal data (also known as Personal Identifiable Information) is all information that can be used, individually or combined, to identify a natural person. Examples of personal data are names, addresses, contact details, SSN/BSN, etc.

Controller:

The controller (Schuberg Philis) is responsible for data processing in accordance with the GDPR.

Data subject:

The owner of the personal data that is supplied to the controller. You share the responsibility when it comes to protecting your personal data and keeping them accurate and up to date.

Consent:

Consent is freely and explicitly given by the data subject to the controller to process personal data.

Devices:

All types of devices, such as computers, smartphones, tablets and all other devices with internet access you can use to visit our website.

2 Use of Personal data

For the purpose of this website (talent and career, newsletter, and cookies), we rely on explicit consent as a lawful basis for processing your personal data under the GDPR. To find out more about our specific processing activities and use-cases, please refer to the relevant sections of this statement:

Applying for a job at Schuberg Philis?	Talent & Career
Interested in keeping up to date with our latest news and innovations?	Newsletter
Do you want us to remember your visit?	Cookies

▼ 2.1 Talent & Careers

2.1.1 Why do we collect

We highly appreciate your interest in working for Schuberg Philis. When you apply for a job and follow our recruitment process, Schuberg Philis processes your information which includes personal data. The purpose of processing your personal data is:

- To identify our applicants and verify their resume/skillset;
- To create a talent pool of potential colleagues which may be interested in the near future;
- To recruit new colleagues and review their resume/skillset.

2.1.2 How we process your Personnel data

We can use your personal data to:

- Evaluate your suitability for the job opening;
- Communicate with you about the recruitment process and/or your application(s);
- Register you for Schuberg Philis recruitment events;
- Inform the interviewers so that they can prepare for your interview;
- To establish and maintain an employment relationship with you;
- To implement relevant administrative functions;
- Make improvements to Schuberg Philis' application and/or recruitment process.

2.1.3 Which of your Personal data we collect

By applying to an open job application, you initially provide the following personal data to use:

- Full name (first and last name);
- Email address;
- Phone number;
- City and country of residence;
- Resume;
- Cover letter.

We may receive information about you from other sources, for example:

- From commercially available sources such as public databases, or information from third parties. The kinds of personal data that we can collect from such sources include publicly available information, such as user-generated content, blogs, and messages, to the extent permitted by law;
- Information relating to any previous applications you may have made to Schuberg Philis and/or any previous employment history with Schuberg Philis;
- Reference information and/or information received from Schuberg Philis employees.

Note that any personal data that you supply to us via your Resume and/or Cover letter is freely and explicitly given by you, as we do not specifically ask for any other information than asked in the application form.

During the progression of the recruitment (and possibly onboarding) process, you might be asked to provide additional personal information. We will under no circumstance ask for more personal information than necessary to fulfill the purposes that we stated above.

2.1.4 Your consent

By applying to an open job application, you agree to the fact that we will process your personal data for recruitment purposes as set out in article 2.1. You can at any time withdraw your consent as stated under [3. Privacy rights](#) and [6. Our contact details](#). If you withdraw your consent or do not want us to process your personal data, we will not be able to process your application to a job opening.

▼ 2.2 Cookies

2.2.1 The essence of cookies

We use cookies on our website. Cookies are small files, which we send from our website. Your browser stores these files on your computer. They remember your preferences. Cookies are generally used for gaining insight by us and potentially third parties into activities on a website. The cookies that we use, including their use-cases and purposes, are described below.

We make a distinction between the following types of cookies:

Cookie type	Purpose of the cookie:	Used on SBP website?
Functional	Functional cookies are strictly necessary for using our website or providing you the functionalities of our website and enable you to move around the website and remember the choices you have made, including remembering your cookie settings. As these cookies are necessary for providing our website, they are automatically enabled, and you cannot refuse them via this cookie settings tool.	Enabled
Analytical	Analytical cookies are used to record how visitors use our website and generate user statistics on a privacy-friendly basis that help us to improve the quality, effectiveness and user friendliness of our website, products, services and marketing efforts. We have taken measures to protect your privacy	Enabled

	in line with the guidelines of data protection authorities.	
Tracking/Advertising	Tracking or advertising cookies are used to show you relevant advertisements tailored to you on our website and on websites of third parties, including social media platforms, based on your browsing behavior on our website and on websites of third parties and your interests derived from such browsing behavior. They also allow us to track which advertisements you have seen or clicked on our website or websites of third parties to analyze and improve the success of our advertisements campaigns and prevent that you see the same advertisements or advertisements you are not interested in.	Disabled
Social media	These cookies are used to allow you to easily view videos and other content from third party social media providers on our website and share content from our website on your social media account. If you do not accept these cookies, you will not be able to easily view and share social media content. These cookies are placed and read by the relevant third parties and allow these third parties to track your browsing behavior across our and third party websites. We have no control over these cookies, the data recorded using these cookies, and the purposes these are used for by the relevant third parties.	Enabled

2.2.2 What our cookies are doing

We use Functional and Analytical cookies to better understand how visitors use our website, and ultimately improve the quality of our website. We do this by storing user preferences in cookies and by tracking user trends and patterns of how visitors navigate our sites. We use this information to count the number of visitors, to understand the popularity of our content, and to see how people use our website. We also use Social media cookies to help us determine how Social media users find our website through advertisements displayed on the platform, and to optimize those campaigns.

Our website uses "third party" cookies (cookies set by a third party website that provides a service for Schuberg Philis). The table below describes the web tracking cookies used by the website.

A cookie has a certain validity period starting from the moment it is stored on a device you use and may, depending on the cookie, be renewed automatically if you visit the website again. After the validity period has lapsed, the cookie will be deleted by your browser. See the table below for a full overview of the validity periods per type of cookie we use:

Cookie provider:	Purpose of the cookie:	Retention period:
Google analytics	To perform an analysis on visitor statistics (anonymous data about the number of website visitors, where the visitor was referred from, and which pages are popular).	30 days
Microsoft 365	To create anonymous usage profiles for lead generation and marketing campaign management. The cookies are also used for the automation of marketing services and the tracking of email activity.	30 days
LinkedIn	To optimize advertisement campaigns on LinkedIn, by determining how LinkedIn users find our website through advertisements displayed on the platform.	30 days

** Note: We cannot see who visits our website. Also, we do not share or sell this information. Neither does Google and Microsoft.*

2.2.3 Which data do we collect with our cookies

We collect the following data with the log files from the placement of cookies:

- Language settings;
- Web pages and downloads requested;
- IP-address (the traceability of visitors is limited as much as possible by anonymizing the last digit groups of each IP address);
- User agents (browsers, operating system);
- Devices used (type, brand);
- Location (based on anonymized IP addresses);
- Search terms used to arrive at our website via external search engines;
- Links used to get to our website (referrers);
- Pages visited by users (to gain insight into the popularity of website content).

2.2.4 Heatmapping

Alongside cookies Schuberg Philis uses heatmapping techniques to gain a clearer insight into how our website is used. Heatmapping is different from cookies as the technology behind it does not place small tracking files in your browser. Instead, the technology behind mapping only tracks your anonymous behavior on our website.

For the purpose of heatmapping we use the third party listed below:

Provider:	Purpose of heat mapping:
Hotjar	Track computer mouse-movements across the Schuberg Philis website to track visitor behavior and analyze statistics (anonymous data).

2.2.5 Your consent

By using the Schuberg Philis website, you agree to the placement of cookies in your web browser for statistical purposes for which consent is not required. Under no circumstance will Schuberg Philis use your personal data, derived from the placement of cookies, for purposes other than the specified purposes that are stated in the table above. Most browsers are standard set to accept cookies automatically. You can set your browser to refuse all cookies or to notify you when a cookie is being sent. Note that some features or services on our websites may not work properly without the use of cookies.

3 Privacy rights

3.1 Your privacy rights

As a data subject, you have various rights under the GDPR to which you can appeal to ensure that your personal data is handled responsibly and with due care. As a data subject, you have the following applicable rights:

Your right:	Elaboration on this right:
Right of transparency	You have the right to full transparency of the processing of your personal data by us. This means that we will communicate the processing of your personal data in a concise, transparent, intelligible, and easily accessible form, using clear and plain language.
Right of access	You have the right to know, via a request, if we are processing your personal data, why we are processing your personal data, how we are processing your personal data, and who we

	share your personal data with. Upon receiving your request, we will determine on a case-to-case basis to what extent we can disclose information about the processing of your personal data.
Right to rectification	You have the right to rectify (change) any inaccurate personal data that we possess of you.
Right to erasure	You have the right to be forgotten by us. This means that you can fill in a request in which you state that we have to delete all the personal data that we have of you. Upon receiving your request, we will determine on a case-to-case basis if we can (legally) dispose of your personal data.
Right to restriction of processing	You have the right to fill in a request in which you state that you want us to minimize or stop the processing of your personal data. Upon receiving your request, we will determine on a case-to-case basis to what extent we can and must restrict the use of your personal data.
Right to object	You have the right to object to the processing of your personal data. You can file a request to us to stop processing your personal data for a specific purpose or all together. To continue our processing activities, you either must give us your explicit consent and/or we must have a legitimate argument to refuse your request.

3.2 How to exercise your rights

If you want to appeal to your rights, have comments to make, or questions to ask about how you can appeal to your privacy rights, you can contact the colleague with whom you spoke previously or contact us by clicking on the 'Contact' link on the Schuberg Philis website. Or refer to [6. Our contact details](#) for more details on how to contact our Data Protection Officer (DPO).

4 Data protection and transfer

4.1 Security

We take all reasonable preventive measures to protect your personal data, and we require third parties that process, or handle your personal data for us to do likewise. Access to your personal data is limited to prevent unauthorized access, change, or misuse. Access is only permitted for our colleagues and third parties on a need-to-know basis.

4.2 Retention

We do not retain your personal data longer than necessary for the purpose for which we process your personal data. The following retention periods are upheld when processing your personal data according to the purposes stated in [2. Use of Personal data](#):

- **Talent & Careers:** your personal data will be retained for a full calendar year. After which you will be asked to give your explicit consent to retain them for an additional year. The benefit of the extended retention period is that we more easily contact you about suitable future job openings. If you withdraw your consent, we will delete your personal data out of our systems.
- **Newsletter:** your personal data will be deleted when filling in a request to stop the processing of your personal data.
- **Cookies:** the cookies are stored no longer than 30 days in your web browser.

4.3 International data transfer

The transmission of personal data as described in this Privacy Statement may include overseas transfers of personal data to countries whose data protection laws are not as comprehensive as those of the countries within the European Union. Where required by European law, Schuberg Philis shall only transfer personal data to recipients offering an adequate level of data protection. In these situations, as may be required, we make contractual arrangements to ensure that your personal data is still protected in line with the GDPR.

5 Changes to this privacy statement

Just as our business changes constantly, this Privacy Statement may also change from time to time. If you want to see changes made to this Privacy Statement from time to time, we invite you to access this Privacy Statement to see the changes. You can see the date on which we last updated this privacy statement at the beginning of this document. If we make material changes or changes that will have an impact on you (e.g., when we start processing your personal data for other purposes than set out above), we will contact you prior to commencing that processing.

6 Our contact details

If you have any questions, concerns, or complaints about our processing of your personal data, you are welcome to contact our DPO via dpo@schubergphilis.com. All questions and complaints reported to Schuberg Philis will be investigated. Schuberg Philis will attempt to resolve complaints and questions in line with internal policies.