

## PLASTICSEUROPE AISBL

### PRIVACY NOTICE FOR JOB APPLICANTS

#### 1. Introduction

This privacy notice explains how PlasticsEurope AISBL ("**PlasticsEurope**" or "**We**", "us", "our"), collects and uses Personal Data about job applicants ("**You**", "your") as part of our recruitment process, in accordance with the General Data Protection Regulation ("**GDPR**").

We are the data controller. This means that We are responsible for deciding how We collect and use (process) Personal Data about You. We are required under GDPR to notify You of the information contained in this Notice.

#### 2. What Personal Data do We hold about You?

We collect, store, and use the following categories of Personal Data about You:

- (a) Personal contact details such as your name, address, telephone numbers and email address and identity details such as your date of birth, gender;
- (b) All details included in your CV, covering letter or application, such as your education and employment history;
- (c) Details regarding your citizenship status, residency and/or other visa information or eligibility to work in a country;
- (d) Your academic and professional information such as your academic history, job titles, salary, school attended, employee files, evaluations, professional references, interviews and certifications;
- (e) Any information You or a third party provides to us during the recruitment and selection process;
- (f) Information included in the contents of e-mails exchanged between You and us and feedback on your application and any subsequent interview notes;
- (g) Preferences related to job location and salary;
- (h) Offered terms and conditions of employment;
- (i) Photographs if provided;
- (j) Your visa and passport and a copy of each as needed; and
- (k) Background checks relating to employment history, credit information, social media.

All together your "**Personal Data**".

### 3. **How is your Personal Data collected?**

We collect Personal Data about You through the application and recruitment process, either directly from You or through an employment agency. We may sometimes collect additional information from third parties including former employers, referees, or through information that is available in the public domain.

We may also collect Personal Data relating to You from LinkedIn and other public and social media websites and public company registries, criminal or tax records.

### 4. **How do We use your Personal Data? And on which legal basis?**

We use your Personal Data for different purposes. These include:

- (a) Assess your skills, qualifications and suitability for a role and decide about suitable candidates for available roles within PlasticsEurope;
- (b) Carry out background and reference checks;
- (c) Check You are legally entitled to work;
- (d) Communicate with You about the recruitment process;
- (e) Draft employment agreements that will be concluded if You are hired;
- (f) Compliance with security and other mandatory policies (including building access);
- (g) Contact You regarding other job vacancies or opportunities that arise within PlasticsEurope;
- (h) Monitor the overall level of interest in job vacancies and opportunities and to carry out relevant analysis; and
- (i) Deal with legal disputes involving You.

We do so primarily to allow us to perform our contract with You or in order to take steps at your request prior to entering into a contract.

In relation to purpose (c), we do so in order to comply with our legal and regulatory obligations. When we need to deal with a legal dispute involving You, we process Personal Data on the basis that it is necessary for the establishment, exercise or defence of legal claims.

In some cases, We may use your Personal Data to pursue legitimate interests of our own or those of third parties (including our members), provided your interests and fundamental rights do not override those interests. Our legitimate interests include: making informed recruitment decisions and selecting suitable candidates for available roles, improving our recruitment process, facilitating the interview process, and ensuring the security of our premises and staff. You can obtain further information about these legitimate interests and how we have made sure that these legitimate interests do not override your rights and interests by contacting us at the contact address below. When We collect and process your Personal Data based on legitimate interest, You have specific rights (see 12 below for more information in that regard).

In relation to purpose (g), we will only contact You for future job vacancies if You provide us with your consent.

**5. Special categories of Personal Data**

Some of the Personal Data we collect during and after the recruitment process might amount to special categories of Personal Data (information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation health conditions, race, gender, etc.). Special categories of Personal Data are granted a higher level of protection under the GDPR. Please make sure that when applying and during the recruitment process, You do not share special categories of Personal Data with us, or that You do so only if strictly necessary.

We may process special categories of Personal Data because We have a lawful basis for doing so, in particular:

- (a) When We need to carry out obligations or exercise specific rights in the field of employment and social security law; or
- (b) Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

**6. If You fail to provide Personal Data**

If You fail to provide certain information when requested, We may not be able to manage the recruitment process or We may be prevented from complying with our legal or regulatory obligations.

**7. Change of purpose**

We will only use your Personal Data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If We need to use your Personal Data for an unrelated purpose, We will notify You and We will explain the legal basis which allows us to do so.

**8. Which third parties process your Personal Data? Do We share, disclose or transfer Personal Data?**

We may have to share your Personal Data with third parties, including third party service providers.

The following activities are carried out by third parties:

- (a) IT service providers;
- (b) Social secretariat and other public agencies;
- (c) Our members; and
- (d) Recruitment agencies.

The Personal Data that We collect about You may be transferred to, and stored at, one or more countries outside the European Economic Area ("EEA"). In such cases, We will take appropriate steps to ensure an adequate level of data protection in the country of the recipient as required under the GDPR. If We cannot ensure such an adequate level of data protection, your Personal Data will only be transferred outside the EEA if You have given your prior consent to the transfer.

9. **Data security**

We have put in place appropriate security measures to protect the security of your information and to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of those measures are available on request. In addition, We limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify You and any applicable regulator of a suspected breach where We are legally required to do so.

10. **How long do We retain your Personal Data?**

We store your Personal Data for the duration of the recruitment process. If You are successful in your application your Personal Data will be retained in accordance with our Staff Privacy Notice (that will be provided to You once You will start your working relationship with us). If You are unsuccessful, we will retain your Personal Data for 6 months after communicating You our decision not to hire You. If You consent, we will keep your Personal Data for 2 years after our last communication with You to contact You in case other job opportunities arise at PlasticsEurope. We might also have to keep your Personal Data for longer if this is necessary for the establishment, exercise or defence of legal claims.

11. **Your duty to inform us of changes**

It is important that the Personal Data We hold about You is accurate and current. Please contact our Human Resources Department at [HR@plasticseurope.org](mailto:HR@plasticseurope.org) to update your personal record and keep us informed of any changes to your Personal Data during your working relationship with us.

12. **Your rights in connection with your Personal Data**

Under certain circumstances, by law You have the right to:

- (a) **Request access** to your Personal Data. This enables You to receive a copy of the Personal Data We hold about You and to check that We are lawfully processing it.
- (b) **Request correction** of the Personal Data that We hold about You. This enables You to have any incomplete or inaccurate information We hold about You corrected.
- (c) **Request erasure** of your Personal Data. This enables You to ask us to delete or remove Personal Data where there are no good reasons for us continuing to

process it. You also have the right to ask us to delete or remove your Personal Data where You have exercised your right to object to processing (see below).

- (d) **Object to processing** of your Personal Data where We are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes You want to object to the processing on this ground.
- (e) **Request the restriction of processing** of your Personal Data. This enables You to ask us to suspend the processing of Personal Data about You, for example if You want us to establish its accuracy or the reason for processing it.
- (f) **Request the transfer** of your Personal Data to another party (data portability).

If You want to review, verify, correct or request erasure of your Personal Data, object to the processing of Your Personal Data, or request that We transfer a copy of your Personal Data to another party, please contact us at [HR@plasticseurope.org](mailto:HR@plasticseurope.org).

When we rely on your consent, you have the right to withdraw it at any time by sending an email to [HR@plasticseurope.org](mailto:HR@plasticseurope.org).

If You are dissatisfied with any aspect of our handling of your Personal Data, You have the right to make a complaint at any time to the Belgian Data Protection Authority.

### 13. **Change to Notice**

We may update this Notice at any time and any revisions will be made available to You via our website. It is important that You read this Notice and any subsequent revisions, together with any other privacy notice We may provide on specific occasions when We are collecting or processing Personal Data about You, so that You are aware of how and why We are using such information.

### 14. **Our contact details**

PlasticsEurope AISBL Rue Belliard 40, Box 16  
1040 Brussels – Belgium  
T: +32 (0)2 792 30 99  
E: [HR@plasticseurope.org](mailto:HR@plasticseurope.org)

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