GDPR HR CHARTER

CREDENDO

> General characteristics

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1. Why have a GDPR statement on personal data protection?

> Preamble

Your privacy is a priority for Credendo (hereinafter referred to as 'We'/'Us'). In this respect, we undertake to respect applicants' personal data (hereinafter referred to as 'You'), to process them with the greatest care and to provide the best level of protection for them in accordance with Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the 'GDPR') and with the applicable national regulations.

This privacy policy provides information on:
- what personal data we collect about You and the reasons for this;
- how we use your personal data;
- your rights regarding your personal data and the means of exercising.

> Glossary of the main legal terms used in this policy

Terms frequently used in this policy	Definitions in accordance with GDPR	Explanation of terms in plain language
Personal data	Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.	All types of information relating to a natural person, i.e. an individual (such as you), who can be identified, directly or indirectly, as a person distinct from other persons. For example: a name, photo, fingerprint, e-mail address, telephone number, social security number, etc. Anonymous data, which cannot be used to determine your identity, is not therefore regarded as personal data.
Data Protection Officer	The Data Protection Officer (DPO) is not identified in the GDPR.	Within the company the Data Protection Officer is specifically responsible for compliance with the GDPR and the applicable national legislation, as well as for our policy and practices relating to management of your personal data. This person is also responsible for cooperation with the supervisory authorities. The DPO is the preferred contact if employees of Credendo – Export Credit Agency have any questions in connection with their personal data. Employees of Credendo – Trade Credit Insurance should

		contact the Compliance Officer with any questions.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.	Any fully or partially automated processing of personal data or any non-automated processing of personal data forming part of or intended to form part of a filing system (storage, organisation, retention and alteration of personal data, alignment with other data, disclosure, etc.). For example: use of your data to manage recruitment, training, assessments, salaries, etc.
Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.	The person, public authority, company or organisation which manages your data and decides on any use of these data. This is the person or body which decides to create a processing operation or to erase processed data and determines why your data will be processed and to whom they will be transferred. This person or body is the party with primary responsibility for ensuring the protection of your data.
Processor	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.	Any natural or legal person which performs data processing tasks in accordance with the instructions given by and under the responsibility of the controller.

2. Who is responsible for the use of your data as part of your application at Credendo?

- **If you are applying for a job at Credendo – Export Credit Agency**

The controller of your personal data is Credendo – Export Credit Agency, with registered office at Rue Montoyerstraat 3, 1000 Brussels, Belgium, registered with the Crossroads Bank for Enterprises under no. 0203.286.759.

You can send any questions relating to the processing of your personal data to this e-mail address: credendodataprotection@credendo.com.

Designation of an internal party who is responsible for the use of your data (DPO)

Credendo – Export Credit Agency has designated a Data Protection Officer (DPO), Mr Geert GOOSSENS, for employees of Credendo – Export Credit Agency. Specifically, he is responsible for independently ensuring that the rules governing the protection and management of your data are applied internally, as well as for ensuring cooperation with the supervisory authorities.

Contact details of Mr GOOSSENS:
Mr Geert GOOSSENS
Rue Montoyerstraat 3, 1000 Brussels
Belgium
E-mail: credendodataprotection@credendo.com

- **If you are applying for a job at Credendo – Trade Credit Insurance**

The controller of your personal data is Credendo – Trade Credit Insurance, with registered office at Rue Montoyerstraat 3, 1000 Brussels, Belgium, registered with the Crossroads Bank for Enterprises under no. 0867.435.663.

Credendo – Trade Credit Insurance has entrusted Credendo – Export Credit Agency with the processing and management of the data it needs to manage the relationship with its employees. Credendo – Export Credit Agency therefore acts as processor for Credendo – Trade Credit Insurance and processes the data on behalf of Credendo – Trade Credit Insurance.

Within Credendo – Trade Credit Insurance the Compliance Officer, Mr Geert GOOSSENS, is responsible for monitoring all matters relating to data protection and, specifically, the application of this policy.

Contact details of Mr GOOSSENS:
Mr Geert GOOSSENS
Rue Montoyerstraat 3
1000 Brussels
Belgium
E-mail: credendodataprotection@credendo.com

3. Why do we collect your personal data and on what grounds?

Credendo – Export Credit Agency collects and uses your personal data in the framework of your application for a current or future employment at Credendo – Export Credit Agency or at Credendo – Trade Credit Insurance. Your personal data are processed for the purpose of registering your application for a position within our company. If you are admitted to the selection procedure, we will draw up your profile, which involves processing all the data needed to assess your application with a view to potentially hiring you. This assessment may be carried out by a third party.

Processing your personal data is therefore necessary to allow us to take measures before entering into an employment contract and is in the legitimate interest of Credendo – Export Credit Agency or Credendo – Trade Credit Insurance, namely our interest in being able to assess you before making an offer of employment; we believe this is also in your interest, or in any case is not outside our legitimate interest.

If you receive a positive assessment and we decide to hire you, your personal data will also be used to draw up your employment contract.

In the event that you are not hired, we will retain your personal data for a certain period (see point 7) in the legitimate interest of Credendo – Export Credit Agency or Credendo – Trade Credit Insurance, so

that we can contact you in the future if any future vacancies match your profile and so that we can manage any disputes.

4. What personal data do we collect about you?

Credendo – Export Credit Agency only collects the personal data you provide us with in the framework of a recruitment or application procedure within Credendo – Export Credit Agency or within Credendo – Trade Credit Insurance.

Below you'll find a detailed overview of the data we collect for this purpose:

- Personal identification data (last name, first name(s), address, etc.)
- Demographic characteristics (date and place of birth, nationality, etc.)
- Information about your marital status/family situation
- If needed, proof of identity, work permit and residence document (mandatory inspection by the law on the employment of foreign employees)
- Resume, cover letter, information on education/degrees and professional experience, information you share in application interviews
- Photographs
- Hobbies and interests
- Criminal record extract (if legally obliged)
- References, if you supply these to us
- Data from social media, if this information is publicly available to us

You are not obliged to supply this information to us. If you do not, however, this may adversely affect your chances of being hired.

5. Who do we share your personal data with?

The HR department and your prospective superior(s) will have access to your personal data for the above purposes on a strict need-to-know basis.
Credendo – Export Credit Agency may share your personal data with Credendo – Trade Credit Insurance.

Furthermore, subcontractors may obtain access to your personal data for the processing they execute for us, namely Cegid Talentsoft, Atolo and Thomas International.

6. Do we exploit your personal data?

We do not share your data with trading partners who would like to offer you products and services.

7. How long do we keep your personal data for?

Credendo – Export Credit Agency has set out the following rules concerning the duration for which your personal data are kept.

2 years, starting from 31/12 of the year in which we obtained your personal data.

8. What rights do you have regarding your personal data and how can you exercise them?

We would like to inform you of your rights with regard to your personal data.

A. Right of access

You can access all of the following information regarding:

- The categories of personal data that we collect about You;
- The reasons why we use these data;
- The categories of persons to whom your personal data have been or will be communicated and in particular persons based outside the EEA;
- The duration for which your personal data will be kept in our systems;
- Your right to ask us to correct or erase your personal data or to limit the use that we make of your personal data, and your right to oppose such use;
- Your right to make a complaint to a European data protection authority;
- Information concerning the source when we have not collected your personal data directly from You;
- The way in which your personal data are protected when they are transferred to countries outside the EEA.

B. Right to correction

You can ask us to correct and/or update your personal data.

C. Right to erasure of data

You can also contact us at any time to ask us to erase the personal data that we are processing about you, if one of the following situations applies to you:

- Your personal data are no longer necessary as the reasons for which they were collected or processed are no longer valid;
- You have withdrawn your consent, which is the basis to process your personal data;
- For your own reasons, you believe that one of the instances of processing your data is infringing on your privacy and causing you excessive damage;
- Your personal data are not being processed in accordance with the GDPR and with the applicable national regulations;
- Your personal data must be erased to comply with a legal obligation provided for by European Union law or by Belgian national law.

D. Right to object

Generally, the applicable legislation gives you the right to object, at any time for a reason particular to you, to the processing of your personal data. Indeed, if you believe that such processing is infringing on your privacy and/or causing you excessive damage, you may use this right.

However, under no circumstances may You prevent us from processing your data:

- if such processing is necessary for the entering into or performance of your contract;
- if such processing is required by law or by a regulation. This is particularly relevant when you move to another town;
- if such processing is required to record, exercise or defend the rights in court.

You can object to the use of your personal data for commercial proposal purposes and, in particular, advertising actions. You can also object to profiling insofar as it is connected to such a proposal (for example when we send personalised content to you).

E. Right to data portability

With this right you will have the chance to control your personal data yourself more easily and, more precisely, to:

- recover your personal data, which are being processed by us, for your personal use and to store them on a device or in private cloud storage, for example;
- transfer your personal data from us to another company, either by you or directly by us, provided that a direct transfer is 'technically possible'.

This right concerns your data that have been actively and knowingly declared, such as the data you provide (e.g. personal identification data), and the information that we collect.

Conversely, the personal data that are derived, calculated or inferred from the data that you have provided are excluded from the right to data portability because they are created by us.

F. Right to restriction of processing

You have the right to obtain restriction of processing, meaning that your registered personal data will be marked (for example a temporary move of your personal data to another processing system of blocking these data in order for them te become inaccessible) in order to restrict future processing.

You can exercise these rights when:

- you dispute the correctness of your personal data;
- your personal data are not being processed in accordance with the GDPR and with Belgian legislation;
- your personal data are no longer needed for the processing purposes, but you need them in order to institute, exercise or ground a legal action (e.g. to establish, exercise or defend your rights);
- the decision on your objection to the processing is pending.

In case of restriction of processing, your personal data will no longer be subject to any processing without your prior consent, except for storage of your data to institute, exercise or ground a legal action, or to protect another natural or legal person’s rights, or for reasons of substantial public interest for the Union or a Member State.

In case of restriction of processing of your personal data, we will inform you before removing the restriction.

9. How to exercise your rights?

We would like you to be able to exercise your rights in the easiest possible way.

In order to exercise one of the afore-mentioned rights, simply send an e-mail to **credendodataprotection@credendo.com** indicating your full name. Please mention the right you wish to exercise in the subject field. Don't forget to mention in your e-mail the documents to which your question relates and the type of your request.

You can also exercise these rights by writing to us at the following address:

Credendo – Export Credit Agency
for the attention of the Group Chief Human Resources Officer, Mrs Hautman, and/or
for the attention of the Data Protection Officer, Mr Goossens,
Rue Montoyerstraat, 3
1000 Brussels
Belgium

In your signed request you must clearly state the address to which the response should be sent.

Unless this is explicitly prohibited under national legislation, we may ask you to provide us with a copy of the front side of your identity card. The copy will be destroyed once the request has been processed.

In principle, you can expect us to respond to your request (by e-mail or post) within one (1) month of your request being received. This period can be extended by two (2) months if your request requires extensive searches (complex request) or if we receive an excessive number of requests.

If your request is vague or does not contain all the information we need to be able to respond, we will ask you to supply the relevant information to us within this period.

10. Will your personal data be transferred to other countries?

Transfer of data within the EEA

> Personal data benefit from the same level of protection within the European Economic Area (i.e. the 28 member states of the EU, Iceland, Norway, Liechtenstein).
> The list of the European entities in the group with which we share your data, and where they are established, is available on our website www.credendo.com/about.

11. Would you like to contact us about this personal data protection policy and/or to make a complaint to a data protection authority?

Do you have any questions or suggestions regarding this personal data protection policy?

Please do not hesitate to contact us by e-mail at the following address: **credendodataprotection@credendo.com** or by post:

Credendo – Export Credit Agency
for the attention of the Group Chief Human Resources Officer, Mrs Hautman, and/or
for the attention of the Data Protection Officer, Mr Goossens,
Rue Montoyerstraat, 3
1000 Brussels
Belgium

We would be happy to hear from you and we will reply to you as soon as we can.

> **Do you think that we are not doing enough to protect your personal data?**

If you believe that Credendo – Export Credit Agency is not processing your personal data in accordance with the GDPR and with the applicable national regulations, you have the right to make a claim to:

- the data protection authority in the European country in which you normally reside; or
- the data protection authority in the European country in which you work; or
- the data protection authority in the European country in which the breach of the GDPR occurred.

> **Make a complaint to the Belgian Privacy Protection Commission (CPVP):**

- by post:
  Data protection Authority (DPA)
  Rue de la Presse, 35
  1000 Brussels
- by e-mail: contact@apd-gba.be

> **Make a complaint to another European data protection authority:**

To make a complaint to another data protection authority, please consult the website of the authority concerned.

12. How will you know if this personal data protection policy has been amended?

The personal data protection policy may be amended at any time, in particular to take account of any legislative or regulatory amendments.

When we publish amendments to this policy, we will revise the 'last update' date and we will give a description of the changes in the 'Change History' tab.

Please consult this policy regularly to see how Credendo – Export Credit Agency and Credendo – Trade Credit Insurance are protecting your personal data.

> **Change history**

Version	Date	Revision description
1.0	25/05/2018	Initial version
1.2	12/12/2018	Reviewed ID card
1.3	31/03/2020	DPA and Talentsoft replaces Cornerstone
1.4	12/2022	Designation of Credendo – Export Credit Agency as processor and designation of the controllers Credendo – Export Credit

		Agency and Credendo – Short-Term Non-EU Risks; general update.
1.5	03/2026	New name ‘GDPR HR Charter’ and ‘Credendo – Trade Credit Insurance’