



Privacy statement

Code Nomads

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In this privacy statement we'll explain which personal data we collect and use and for what purpose.

Code Nomads is an organization working throughout the Netherlands. Code Nomads seconds Java professionals both directly and indirectly to clients and we feel responsible for the personal information that is provided to us in confidence. This is also reflected in our privacy statement.

The privacy statement of Code Nomads

Everyone is entitled to have careful handling of his/her personal data. Code Nomads supports this need for safety and security for our customers, clients, employees and relations. Code Nomads is honest, transparent and careful with the personal data deposited.

The legal framework

With regard to privacy and the protection of personal data, Code Nomads has to deal with the following legal framework and rules:

- *Wet bescherming persoonsgegevens (Wbp) / Personal Data Protection Act.* This sets out the most important rules for dealing with personal data in the Netherlands. The Dutch Data Protection Authority (Autoriteit Persoonsgegevens) supervises the enforcement of this law. Since January 1, 2016 there is also a requirement to report data leaks.
- *General Data Protection Regulation (GDPR).* This is the EU regulation replaced the Wbp from May 2018
- *Tax legislation,* such as the *Wet Rijksbelastingen (State Tax Act)* and *Uitvoeringsregeling LB (Salary Tax Implementation Regulation).*

What are personal data?

According to the law, personal data are all information relating to an identified or identifiable natural person (the data subject). So, the combination of name and date

of birth, contact details and a passport photo are all personal data. In addition, the law has special personal data; these are data that are extra sensitive and need additional protection. This concerns, for example, your BSN-number (social security number), health- or medical data and the data of children.

Which personal data do we collect?

Code Nomads collects all kinds of data from natural persons. We collect personal information from employees (and their spouses / children), clients, agencies, freelancers, vendors, candidates and potential candidates. We use personal data, for example, for the conclusion of a secondment agreement and for the collection of the invoices in our role as employer.

We collect:

- Full name
- Gender
- Address and postal code
- Phone number
- E-mail address
- Date and place of birth
- Marital status
- BSN number
- Color copy of ID (passport, ID-card, visa)
- Payment details, such as bank account
- CV / resume
- Certificate of Good Conduct (VOG-verklaring) and/or pre- employing screening
- Data for insurances and pension
- Data for our financial systems
- Employees' data on functioning and assessment
- Data of partners and children, that are provided by the employee
- Employees income data
- Employees copy of certificates and diplomas

The processing of your personal data by Code Nomads is based on (the intention to) entering into an agreement. It happens that we ask for your explicit permission for a specific purpose. If you give permission, you can simply withdraw your consent by notifying us.

Why do we need personal data?

Code Nomads needs personal data to be able to carry out our work properly and to fulfill agreements. We use this data for:

- To do employee administration for Code Nomads and the staff association of Code Nomads
- Carrying out payroll administration
- Compliance with statutory and fiscal obligations
- Recruit new employees and process applications
- To second our own employees, external employees and freelancers
- Concluding lease car agreements

- To cover for insurances and pensions
- Research into the quality of our services
- Internal management and management of the organization
- Execution of payments to creditors
- Calculating income and expenses and having auditing done

How do we use and protect personal data?

We do not process more personal data than necessary for our work. We never publish personal details of employees and other relations without permission.

Confidentiality

Everyone who has access to the personal data is careful with this and is bound by confidentiality obligations as stated in the Code Nomads Staff Manual .

Access to data

Only employees who really need it for their work have access to personal data and are allowed to view and process these insofar as necessary.

Retention periods

Personal data are not kept longer than the legal retention periods. We then destroy this personal data or store it in such a way that it is no longer traceable to a person.

Security

We take all necessary organizational and technical security measures that are necessary to prevent misuse of and unauthorized access to personal data.

Share data with other organizations

Code Nomads uses the collected personal data for its own business operations. For this purpose, it may be necessary to share personal data with organizations that carry out work for us, or with which we work together, such as, for example , clients, lease car companies and insurance companies. If another organization or company works for us, this organization must have signed a processor agreement, stating why they received and processed this information and how they should deal with it. Furthermore, government agencies or organizations with a statutory task can request information from us, that we are obliged to share.

Are your data being brought outside the EU?

Code Nomads has as its starting point to process personal data only within the EU. Since the privacy regulation is applicable within the EU, an appropriate level of protection can always be guaranteed in principle.

What rights do you have?

Every data subject (every natural person whose personal data is processed) has the right to access, correct, supplement, delete, protect, transfer and exercise the right to object to the processing of his personal data.

Requests for inspection

Requests for inspection can be submitted via email to Code Nomads at privacy@codenomads.nl. When a request for access is made, the applicant receives a complete overview of the processed data, the origin of the data, the recipients of the data and the purposes of processing the data.

The following data are not submitted by Code Nomads:

- Personal work notes and notes for internal use;
- Personal data of third parties;
- Personal data used in the prevention, investigation and prosecution of criminal offenses and other cases mentioned in the exceptions of art. 23 GDPR.

Before a request for access is taken, the person concerned must first have identified himself.

The right of correction

If the personal data we process about you are not correct, you have the right to adjust it.

The right of removal

If we no longer need your personal data for the purpose for which we received it, you have the right to ask us to remove it. Here are a few exceptions, such as our obligation to retain certain data for the tax authorities.

Right of resistance

In connection with personal special circumstances, a data subject may object to the processing of certain data in cases regulated by law. The request must be submitted to Code Nomads via email or in writing and with motivation. We decide within four weeks of receiving the request whether the objection is justified. If the objection is justified, we immediately terminate the processing. Code Nomads is not obliged to respond to an objection if the provision of data by Code Nomads is legally required.

The right of objection

If Code Nomads processes data on the grounds of legitimate interest or public interest, it is possible to make an objection after which a weighing of interests will follow.

Personal data and digital media

Code Nomads does not collect personal data via its website and does not use it for example cookies, Google Analytics and contact forms. It is however possible to send Code Nomads an email. The data is stored in the mail as long as necessary to correctly handle this email. We process the personal data that we receive via e mail according to the guidelines as described in this privacy statement.

Authoriteit Persoonsgegevens (Authority Personal Data)

Of course we are happy to help you if you have complaints about the processing of your personal data. Should you nevertheless come to an agreement with us, then

you also have the right under the privacy legislation to file a complaint with the privacy guard; the Autoriteit Persoonsgegevens (Authority Personal Data).

Changes to this privacy statement

Code Nomads can make changes to this privacy statement. We therefore advise you to check for updates on our website regularly. You will then stay informed of changes.