



## Privacy Statement for recruitment

Name policy	Privacy statement for recruitment	Version n°	1.0
Publication date	1 June 2023	Last review date	/
Responsible department	Central Talent, Talent Acquisition		

History				
Version	Approved by	Review date	Description of the modifications	Works Council
1.0	Privacy & Confidentiality Office Talent Legal	/	/	30 May 2023

### Privacy Statement Summary

This privacy statement explains what personal information we gather about you, what we use that information for and who we give that information to. It also sets out your rights in relation to your personal information and who you can contact for more information or queries. Click on the links below to take you to the more detailed sections of this statement:

- [Who this privacy statement applies to and what it covers?](#)
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- [For which purpose do we use your personal information?](#)
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## Who this privacy statement applies to and what it covers?

This privacy statement applies to all Belgian entities of the Deloitte Network<sup>1</sup>, (separately referred to below as a “**Belgian Deloitte entity**” and together as “**Deloitte**” or “**we**”) and to all applicants applying for a position within Deloitte as an employee, (summer) trainee, student or a self-employed contractor, including as a director or as a permanent representative of a company providing services to Deloitte as well as to all potential candidates being contacted in the context of recruitment (referred to below as “**you**” or “**your**”).

The protection of your personal data is of great importance to us. Therefore, with this privacy statement, we wish to inform you about how we will collect, handle, store and protect your personal information in the course of the recruitment process.

In this privacy statement, your information is sometimes called “personal data” or “personal information”.

We may also sometimes collectively refer to handling, collecting, protecting and storing your personal information as “processing”.

### Data controller

The data controller is the natural person or legal person determining the purposes and means of the processing of your personal data.

The Belgian Deloitte entities mentioned in this privacy statement will act as joint data controllers. A full list of the Belgian Deloitte entities employing personnel or contracting self-employed contractors can be found at the bottom of this privacy statement, together with their full address.

These Belgian Deloitte entities have agreed on the fact that Deloitte Services & Investments NV (“**DSI**”) will assume responsibility for compliance with their respective information duties and their obligations as regards the exercising of your rights within the framework of the processing of personal data.

### Data subjects

This privacy statement applies to all individuals applying at Deloitte or who have been contacted by Deloitte for recruitment purposes.

## What personal information do we collect about you?

Generally, we will collect or obtain personal data because you give it to us or because it is publicly available.

In specific circumstances, we may receive personal data about you from third parties with whom we have concluded a contract with a view to the collection of that information.

We may also obtain personal data about you via previous employers or professional connections that you have included in your application as references.

Typically, the data we hold about you includes the following (non-exhaustive overview):

- your contact details;
- your education and professional background (information about your compensation and benefits included);
- information you have posted on public social networks;
- information you have mentioned in your cv and in your cover letter;
- the content of our correspondence;
- our assessment of your application and its merits.

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<sup>1</sup> The “Deloitte Network” being Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (“DTTL”), together with its member firms and their respective subsidiaries, affiliates and other firms with which it constitutes a network.

We might also invite you to complete certain tests or a questionnaire to assess whether your profile meets the requirements of a position. However, to date, no automatic decisions are made based on the outcome of the tests and a member of the recruiting team will always review the results of the test before a decision is made.

### **For which purpose do we use your personal information?**

We process your personal data in the context of recruitment - particularly if you have applied for an open position, in case you apply spontaneously, or in case you have been contacted by us for recruitment purposes – for the purposes of or in connection with:

- finding the most adequate candidate for a position incl. the creation of a database of potential future candidates, which can be used by all the Belgian Deloitte entities referred to in this privacy statement
- (temporarily) avoiding to contact you again if you stated that you are not open to new job opportunities
- sending out a voluntary survey to ask for the feedback on the recruitment process
- the fulfilment of pre-contractual steps potentially leading to your engagement
- protecting our rights and those of our employees, directors and partners

### **On what legal basis do we collect and process your personal information?**

We use your personal data for the purposes outlined above based on (i) our legitimate interest to find the most adequate candidate for a position; (ii) our legitimate interest to fulfil pre-contractual steps potentially leading to your engagement; (iii) our legitimate interest to respect your wish not to (temporarily) be contacted regarding new job opportunities and to preserve the reputation of our organization; (iv) your consent and (v) the necessity of the processing for the establishment, exercise or defence of legal claims.

### **Who do we disclose your information to?**

In connection with one or more of the purposes outlined in the “**How we use your personal information?**” section above, we may disclose details about you to third parties that provide services to us. Typically, this may include *data hosting* providers. We will only share your personal information to third parties when reasonably necessary or useful for any of the purposes outlined in the “How we use your personal information” section above, and in compliance with the applicable legal privacy provisions. Third parties to whom your personal data are transferred, are bound by specific agreements and are required to keep your data securely.

Additionally, disputes and other incidents may lead us, in exceptional circumstances, to share personal data about you with the police and other law enforcement bodies.

In the context of internal reporting within Deloitte and/or in order to establish consistent HR-related policies at group level, your personal data may also be shared with other Belgian Deloitte entities.

### **Cross-border transfers of personal data**

The technical processing and transmission of your personal data (whether within Deloitte or through third parties) may involve transmissions over various networks, including the transfer of your personal data to other countries.

This may also include a transfer to third countries outside the European Economic Area (such as India and the United States of America) that do not provide a level of protection for personal data equivalent to that guaranteed within the EU by the GDPR. In that case, Deloitte shall take appropriate measures in order to ensure that your personal data is sufficiently protected.

### **Protection of your personal information**

We use a range of physical, electronic and managerial measures to ensure that we keep your personal data secure, accurate and up to date. These measures include:

- education and training to relevant staff to ensure they are aware of our privacy obligations when handling personal data;

- administrative and technical controls to restrict access to personal data on a 'need to know' basis;
- technological security measures, including firewalls, encryption and anti-virus software;
- physical security measures, such as staff security passes to access our premises.

Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavor to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.

## Retention of your personal data

We will hold your personal data for as long as necessary for the purposes described above.

In case you submitted an application with us or in case you have been contacted for recruitment, which did not lead to an employment agreement, services agreement or director's agreement, your personal data will in principle be retained for a period of **three years** in order for the Belgian Deloitte entities mentioned in this privacy statement to be able to contact you if any future job opportunities would seem to match your profile, provided that you give us your consent to retain your personal data for this purpose.

We can keep your personal data for a **longer period of time** in order to establish, exercise or defend our legal rights that might arise on basis of the recruitment process.

If you have been contacted for recruitment purposes but you replied that you are not open to new job opportunities, we will retain, during a period of **one year**, limited personal data from you, namely your name, the date of your last communication with our recruitment department, and the link to your public LinkedIn profile. In this case, the sole purpose of the retention of such data is to prevent you from being contacted again for recruitment purposes, and to respect your wishes and Deloitte's reputation as an organization.

If you no longer want us to hold your data for recruitment purposes, you can contact us by sending an email at [BETAPrivacy@deloitte.com](mailto:BETAPrivacy@deloitte.com).

## Your rights

You have various rights in relation to your personal data. In particular, you have a right to:

- Obtain confirmation that we are processing your personal data;
- Request access to your personal data and receive a copy of the personal data we hold about you;
- Request the correction of your personal data in the event of inaccuracies;
- Ask that we delete personal data that we hold about you. Although you may request your personal data to be deleted at any time, we may have to retain certain personal data for contract performance purposes or in order to comply with statutory retention obligations;
- Withdraw consent to our processing of your personal data (to the extent such processing is based on consent);
- Request the restriction of the processing of your personal data in certain circumstances;
- Receive a copy of your personal data that you have provided to us, in a structured, commonly used and machine-readable format ;
- Object to our processing of your personal data in relation to justified personal circumstances.

Your rights are not absolute however. There are instances where applicable law or regulatory requirements limit these rights and allow or require us to refuse to abide to your request.

## Contact information

If you have any questions or concerns about this statement, any concerns about your personal data being processed as outlined above, or would like to exercise the rights outlined above, please contact us through sending an email at [BETAPrivacy@deloitte.com](mailto:BETAPrivacy@deloitte.com), which is the single point of contact.

## Data Protection Authority

Finally, please note you have the right to lodge a complaint with respect to the processing of your personal data with the Belgian Data Protection authority, the contact details of which are:

Data Protection Authority – Autorité de protection des données - Gegevensbeschermingsautoriteit

Drukpersstraat 35

1000 Brussel

<https://www.dataprotectionauthority.be/citizen>

## Changes to this privacy statement

We may modify or amend this privacy statement from time to time.

To let you know when we make changes to this privacy statement, we will amend the revision date at the top of this document. The new modified or amended privacy statement will apply from that revision date. Therefore, we encourage you to periodically review this statement to be informed about how we are protecting your information.

## List of joint controllers

Controller	Address
Deloitte Services & Investments NV/SA	Gateway Building Luchthaven Brussel Nationaal 1J 1930 Zaventem
Deloitte Accountancy BV/SRL	Gateway Building Luchthaven Brussel Nationaal 1J 1930 Zaventem
Deloitte Consulting & Advisory BV/SRL	Gateway Building Luchthaven Brussel Nationaal 1J 1930 Zaventem
Deloitte Bedrijfsrevisoren/Réviseurs d'entreprises BV/SRL	Gateway Building Luchthaven Brussel Nationaal 1J 1930 Zaventem
Deloitte Belastingconsulenten/Conseil Fiscaux BV/SRL	Gateway Building Luchthaven Brussel Nationaal 1J 1930 Zaventem
Deloitte Global Tax Center (Europe) BV/SRL	Gateway Building Luchthaven Brussel Nationaal 1J 1930 Zaventem
Deloitte Finance CV	Gateway Building Luchthaven Brussel Nationaal 1J 1930 Zaventem