



Last revised: September 2024

STAR Group (STAR) PRIVACY STATEMENT

STAR Group (also referred to below as STAR, 'we', 'our', 'us') values your privacy and will treat the personal data of those concerned with due care. Therefore, we confirm that the personal data will be processed in accordance with both the applicable national data protection and privacy laws, as well as the 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 (hereafter GDPR).

STAR is committed to preserving the privacy of all visitors ('you') to all our websites related to www.star-specialists.com which includes our customers, suppliers, employees and candidates applying for STAR.

STAR is the collective name for the companies that belong to this Group, being:

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- NL: STAR Group Nederland B.V., STAR Freelance B.V., STAR International B.V., STAR Consultancy B.V., STAR Resources B.V.
- BE: STAR Group Belgium N.V.
- GE: STAR Group Holding GmbH, STAR Group Germany GmbH
- AU: STAR Stadlmann GmbH
- SW: STAR Group Nordics AB, STAR Group Sweden AB

This privacy statement provides information about the personal data that STAR collects through our website, contact form, and in our applicant tracking system(s) and the purposes for and legal bases on which we use that personal data.

Personal data collection

Personal data can be defined as any information relating to an identified or identifiable natural person ('data subject'). STAR processes the following data which may include personal data of the data subject from the website:

- If you wish to make use of the contact form you are being asked to provide us with your last name, first name, e-mail address and your message. You can also enter your phone number if you agree that we may contact you by telephone.
- If you wish to register for our member section on the website you are being asked to provide us with your last name, first name, title (reference to gender), e-mail address and you need to create a password. Optional are your phone number, address, education, skills, languages preferred sector and other preferences, as well as a cover letter and CV.
- If you wish to receive job alerts you are being asked to provide us with your last name, first name, e-mail address, job preferences (location, work type and work sector).
- If you wish to refer our website to a friend you are being asked to provide us your and your friend's last name, first name, e-mail address, telephone number and (optionally) work sector.
- If you wish to apply for a vacant function or if you want to submit your CV you are being asked to provide us with your last name, first name, telephone number, LinkedIn profile, motivation and e-mail address.



- If you provided us your C.V. we will use an AI tool to put your C.V. in a STAR template. This document will then be added in our Applicant Tracking System (ATS system). We will remove special categories of personal data from of the C.V. before putting them in a STAR template.
- In some cases, we will collect personal data of you which you have made publicly available yourself through other means such as public accessible information on other (job search) websites, such as LinkedIn.

Our website also contains social media buttons that link to our pages on Meta , X and LinkedIn. The use of personal data by social media companies is governed by the privacy statements of the relevant companies. We encourage you to review these specific privacy statements.

Furthermore, our website uses cookies and web statistics. Data concerning your online behavior on our website may be collected to improve user experience and also to show you vacancies which may be of interest to you. This information helps us to improve the website. Cookies are small data files that can be placed on your computer's hard disk or device. You have the right to not agree on the cookie that we send to you or you can modify your browser's settings in a later stage so that it will not continue to accept cookies. Additional information about how this kind of data is being collected and used can be found in our [Cookie statement](#).

Personal data use

We use the information you submit via one of the services provided, made available on our Website listed above, to manage your request and to provide our services to you accordingly.

If you fill in /provide us directly with the personal data for our processing, we rely on you to provide all necessary and correct information.

Our use of personal data collected via this website, depending on the type of processing, is based on:

1. Your explicit consent: it is possible that we ask your consent to process your personal data and to contact you for the purposes of direct marketing.
2. Performance of our contract, e.g. when subscribing to the website and when you provide your CV, you enter in a (pre)contractual relationship with us.

or/and

The legitimate interests we pursue, which essentially comes down to connecting the right people to the right projects in our areas of expertise (e.g.: when we send you promotional communications for interesting career or business opportunities if you have submitted your email address)

Confidentiality and security of your personal data

STAR has in place reasonable technical, operational and organisational measures to protect all personal data you provide via this website from unauthorized and/or accidental access, disclosure, alteration, loss or destruction.

Personal data collected by STAR will be stored on secured computer storage facilities within the EEA. All information you submit via this website is subject to the application of security and encryption technologies, and STAR shall on a regular basis evaluate and adjust if required, the



appropriateness of the taken security measures in accordance with article 32 of the GDPR. Your personal data is only accessible by a limited number of authorized persons who have been assigned special access rights to our systems and offices and are obliged to keep the information confidential.

Disclosure of personal data to third parties

As long as in accordance with the above-mentioned purposes and compliant with the legal basis, we may disclose your personal data to:

- customers,
- suppliers and
- subcontractors, in particular (sub-)processors that process personal data on our behalf and on our instruction. Those (sub-)processors may be website hosting partners and other parties who assist us in operating our website, conducting our business, or servicing you. We at STAR assure through appropriate processing agreements that our processors comply fully to the required privacy and data protection regulations.

Furthermore, your personal data may be disclosed to third parties as part of a corporate transaction, such as a sale, divestiture, reorganization, merger or acquisition, to which STAR is a party. It goes without saying that in case of such transaction your rights as mentioned below shall remain unaffected.

In addition, we may have to disclose personal data to law enforcement, regulatory or other government agencies or other authorized third parties in order to comply with legal or regulatory obligations or requests.

Transfer of personal data outside the EEA

Due to the international nature of our business, we may need to transfer your personal data to third parties in other countries outside of the European Economic Area (EEA), in connection with the purposes set out in this privacy statement. For this reason, we may transfer your personal data to other countries that may have different laws and data protection compliance requirements, including data protection laws of a lower standard to those that apply in the country in which you are located.

When we transfer your personal data to other countries, we do so on the basis of:

- adequacy decisions;
- suitable Standard Contractual Clauses; or
- other valid transfer mechanisms.

In this case, we will put in place the necessary safeguards and contractual and technical security measures to ensure that all personal data transferred are adequately protected against loss or unlawful processing. You will in any case maintain all of your rights and legal remedies made available under European Union Law.

If you want to receive more information about the safeguards applied to international transfers of personal data, please do not hesitate to contact the DPO and the privacy office under privacy@star-specialists.com.



Data accuracy

We take reasonable steps to ensure that:

your personal data that we process are accurate and, where necessary, kept up to date, and any of your personal data that we process that are inaccurate (having regard to the purposes for which they are processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your personal data we have of you.

Data minimization

We take reasonable steps designed to ensure that your personal data that we process are limited to the personal data reasonably required in connection with the purposes set out in this statement.

Personal data retention period

The period of time for which your personal data is being stored depends on the applicable (statutory) retention periods.

Retention period applicable for applicants

The retention period is 2 years for applicants that are stored in our ATS (Applicant Tracking System). The retention trigger (means the action/moment that the retention period starts) starts when you had a first contact with a consultant of STAR. The retention period for applicants that are not qualified for any function that is being offered by STAR is 1 month. The retention trigger is the first contact with a consultant of STAR.

Retention period applicable for employees/specialists

The retention period applicable for payroll data of employees is 5 years. The retention trigger is the day after the last evaluation with the consultant.

The retention period for personal data (documents) that are important for Tax purposes is 7 years. The retention trigger is the day after the last evaluation with the consultant.

Please note that certain documents in your personnel file will be removed before the 5/7 year retention period mentioned above. e.g. evaluation files, e-mails about the resignation/dismissal.

Your rights

At all times you have the possibility to exercise your rights as described in the GDPR. You can do this free of charge by contacting us, using the contact details of our DPO and the Privacy Office under privacy@star-specialists.com.

As the data subject you can exercise the following rights:

- **Right to access**
You have the right to ask STAR as to whether or not personal data concerning you is processed. If that is the case you can ask access to your personal data, we are processing. You have to right to obtain a copy.
- **Right to rectification, erasure and restriction**
You have the right to have incorrect personal data corrected or completed and the right to have your personal data removed from our files. You acknowledge that, if you refuse to provide certain data or ask for the erasure of your personal data, we will no longer be able to provide certain services. You also have the right to ask for the restriction of the processing of your personal data.



- **Right to object**

If you no longer wish for us to process your personal data, e.g. you wish to no longer be informed about any updates or receive direct marketing, you are entitled to make such request by contacting us using the contact details provided in the contact section or you can click on the unsubscribe-link available in every received e-mail concerned. Please note that you are not entitled to object to the processing of your personal data if such personal data is necessary for the execution of a standing agreement between STAR and you, for example for invoicing you for the provided services.

- **Right to data portability**

You have the right to receive your personal data, processed by us in a structured, commonly used and machine-readable format and/or to transmit those data to another controller.

- **Right to lodge a complaint**

If you believe that STAR has infringed your personal data, you have the right to lodge a complaint with the Supervisory Authority responsible for you:

NL www.autoriteitpersoonsgegevens.nl/nl
BE www.gegevensbeschermingsautoriteit.be/burger
DE <https://www.ldi.nrw.de/>
AT <https://www.data-protection-authority.gv.at/>
SE <https://www.imy.se/en/>

Changes to our or privacy statement

We may modify or amend our privacy statement from time to time. Such modified or amended statement will be applicable as to you and your personal data as of the revision date as mentioned at the top of this statement. We encourage you to regularly review this statement to be informed about how we protect your privacy.

Contact

When you have any questions, comments or concerns about any of the information in this statement and/or relating to the use of your personal data by STAR, please do not hesitate to contact the DPO and the privacy office under privacy@star-specialists.com.