



Privacy Statement for Job Applicants

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1. Introduction

Your personal data is in safe hands with us. As a potential job candidate, you must be secure in the knowledge that we do everything we can to protect your data. Rabobank A.Ş. complies with all the relevant laws and regulations as set out in 1.1 below. This Privacy Statement for the Recruitment and Selection process (referred to below as the 'R&S process') explains how your data is processed.

1.1 Rabobank A.Ş. is bound by the applicable rules regarding personal data processing.

- Personal Data Protection Law Nr. 6698 and its regulations
- Rabobank PrivacyCode
- General Data Protection Regulation (GDPR) for the data shared with Rabobank Group

1.2 What do we mean exactly by 'personal data' and the processing of this data?

- Personal data refers to data which relates to you personally, either directly or indirectly. This might include:
 - Your name and address, date of birth, sex, telephone number and email address
 - Your CV and cover letter
 - Links to your public profiles on websites such as LinkedIn
 - Optional: a photograph and/or audio-visual job application video
- Processing refers to any activity involving personal data. When you apply for a job with Rabobank A.Ş., we collect, use and retain your personal data. We do this, among other things, to verify that you hold the qualifications required for the position.

1.3 Whose personal data do we process, and how do we process it, during the job application process?

This Privacy Statement applies to all processing of the personal data of candidates and potential candidates as part of the R&S process at Rabobank A.Ş. The data is processed in the HR department in Turkey by or on behalf of Rabobank A.Ş. If you are hired by Rabobank A.Ş., you will be subject to the Privacy Statement for Employees.

1.4 Who is responsible for processing my personal data?

Rabobank A.Ş. is responsible for processing all personal data processed by or on behalf of Rabobank A.Ş. Rabobank A.Ş. is the data controller in respect of the personal data processed as 'data controller'.

Our contact details are:

Rabobank A.Ş., River Plaza Esentepe Mah. Büyükdere Cad. Bahar Sok. No. 13, K.7, Ofis no.15-16, 34394 Şişli/Istanbul

e-mail: ik@rabobank.com

1.5 How do we obtain your personal data?

We have two ways of acquiring your personal data:

- You provide this yourself or through a third party/third parties (through an external recruitment agency).
- We also collect data (including contact details) ourselves through resources such as CV databases. We do this if we think you might be interested in working for Rabobank A.Ş. If the recruiter contacts you, they will tell you where they found your details. In addition, they will ask you for permission to use these details to contact you regarding a Rabobank A.Ş. job opening or event. You can change or revoke your consent at any time.

2. Principles and purposes of processing personal data relating to a job application

We process your data:

- based on your express consent – which, can be revoked at any time;
- if it is expressly provided for by the laws;
- if processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract;
- if it is necessary for compliance with a legal obligation to which Rabobank A.Ş. is subject to;

- if your personal data have been made public by yourself;
- if data processing is necessary for the establishment, exercise or protection of any right;
- if processing of data is necessary for the legitimate interests pursued by Rabobank A.Ş., provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

2.1 For what purposes do we process personal data?

We process personal data for the following purposes:

a. Human resources

We require your personal data in order to be able to properly conduct our R&S process. This includes assessing whether you are suitable for the position and whether we would like to invite you for an interview. Another reason might be to produce an access card, which you require in order to enter the building. Rabobank A.Ş. pursues a diversity policy because we want our employees to reflect the larger society.

In this respect, your personal data is processed through obtaining the original or copy of the documents, filling of forms in electronic or in written way, phone calls, e-mails, data integration or CCTV camera recording methods on the grounds of the legal reason that it is expressly provided for by the laws; processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; it is necessary for compliance with a legal obligation to which the data controller is subject; processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

b. Health, safety, security and ethics (including pre-employment screening)

Like all other financial institutions in Turkey, Rabobank A.Ş. subjects future employees to a background check as required by law. Our screening procedures apply to all applicants who are potential Rabobank A.Ş. employees. We attempt to ascertain as accurately as possible whether you, as an applicant to the bank, are sufficiently trustworthy. A positive outcome of the background check is, obviously, a condition for getting hired. All applicants to be screened are subject to the same procedure, which consists of the following two stages:

- Stage 1: the original version of your highest qualification will be verified during the job interview.
- Stage 2: if we intend to enter into an employment contract with you, we will ask you to complete a statement; this statement advises you that we will be gathering information on you.

This includes the opinions of employers you have had over the past two years regarding your trustworthiness.

We may also use data for this purpose from former employers (through references we received from you). We may also consult public sources during the job application process, including publicly accessible and professional social media.

We also record personal data in order to protect the interests of our employees, visitors, the bank and the financial sector. We do this, among other things, through the camera security system.

In this respect, your personal data is processed through obtaining the original or copy of the documents, filling of forms in electronic or in written way, phone calls, e-mails, data integration or CCTV camera recording methods on the grounds of the legal reason that it is expressly provided for by the laws; processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract; it is necessary for compliance with a legal obligation to which the data controller is subject; personal data have been made public by the data subject himself/herself; processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

c. Business reports and analysis and organizational development

We may process your data to create business reports, surveys and analyses. We may also merge the various data we possess on you, for example to improve the R&S reports (e.g. the number of job openings, number of applicants and the time it takes to fill these vacancies). The results of the analyses

and the resulting recommendations can never be traced back to you.

In this respect, your personal data is processed through obtaining the original or copy of the documents, filling of forms in electronic or in written way, phone calls, e-mails, data integration methods on the grounds of the legal reason that processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

d. Statutory requirements

We collect data relating to you based on Personal Data Protection Law and its regulations.

In this respect, your personal data is processed through obtaining the original or copy of the documents, filling of forms in electronic or in written way, phone calls, e-mails, data integration or CCTV camera recording methods on the grounds of the legal reason that it is expressly provided for by the laws; it is necessary for compliance with a legal obligation to which the data controller is subject.

e. Protection of job applicants' vital interests

We may process data in order to protect your vital interests, e.g. your medical details. Suppose you are in acute danger (and have lost consciousness) and are no longer able to give consent for your medical details to be shared. In this case, these details are vital in order to be able to provide you with immediate assistance.

In this respect, your personal data is processed through obtaining the original or copy of the documents, filling of forms in electronic or in written way, phone calls, e-mails, data integration or CCTV camera recording methods on the grounds of the legal reason that it is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.

3. Do we also process special categories of personal data?

By 'special categories of personal data', we mean various types of sensitive data. This data may relate to a person's health, criminal record, and data regarding race or ethnic background. We have an obligation in incident reporting for the financial industry and may process criminal-law data for this purpose. The purpose of incident reporting is to protect the interests of financial institutions, of you as a job applicant, and of our customers. One of the ways in which we do this is through fraud detection. If you ask us to record special categories of personal data relating to you or are disclosing this data yourself, we will only process this data if there is a clear purpose, there are grounds to do so, and this is necessary for the purpose. Special categories of personal data may also be processed, for example photographs or video recordings of you. This includes any pictures you might have enclosed with your CV, as well as camera footage recorded of you on entering the building. We process this camera footage solely for the protection of the property of Rabobank A.Ş. and its employees, and for other security reasons.

If processing special categories of personal data is not required by laws, we will obtain your explicit consent in advance.

4. How do we handle your personal data?

Your personal data is used exclusively by employees who require access to this data on account of their position. The employees who are involved in your application process are bound by confidentiality.

5. How do we deal with third parties?

Sometimes we engage the services of third parties, which process personal data on our behalf. This includes external recruitment agencies. We can only engage third parties if this suits the purpose for which we processed your personal data and this is sufficiently reliable. Furthermore, we will only hire the services of such a third party or parties if they have implemented the appropriate security measures and guarantee confidentiality.

6. Do you transfer my personal data abroad?

Depending on your position we recruit, it may be necessary to share your CV and personal data with

the position specific department head in order to have his/her views about your experience. They, too, may join a possible interview to be performed with you. In case your data needs to be shared with abroad we will ask you to share your consent with us. You always have the option to not to provide your consent or withdraw your consent. You will be notified in case any person abroad wishes to join a job interview we perform with you. The party which your data could be shared with would always be Cooperative Rabobank U.A. its Branches, affiliates and subsidiaries. Rabobank A.Ş. is 100% indirectly owned or controlled by Cooperative Rabobank U.A. resident in Netherlands.

7. How long do you keep my details?

If your job application was unsuccessful and the position is closed, personal data related to the candidate is exterminated by the HR and/or relevant department. If we do need to retain your personal data for a longer period of time, e.g. for future job vacancies, we will ask for your consent. You can revoke this consent at any time. If you are joining Rabobank A.Ş., we will keep the job application file up to fifteen years following your termination of employment.

8. What rights do you have in relation to your personal data?

Below are the rights that you have as a job applicant in relation to the processing of your personal data in Turkey stemming from Personal Data Protection regulation.

- a) Right to learn whether your personal data are processed or not
- b) Right to demand for information as to if your personal data have been processed
- c) Right to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose,
- d) Right to know the third parties to whom his personal data are transferred in country or abroad,
- e) Right to request the rectification of the incomplete or inaccurate data, if any,
- f) Right to request the erasure or destruction of his/her personal data,
- g) Right to request reporting of the operations carried out pursuant to sub-paragraphs (e) and (f) to third parties to whom his/her personal data have been transferred,
- h) to object to the occurrence of a result against the person himself/herself by analysing the data processed solely through automated systems,
- i) Right to claim compensation for the damage arising from the unlawful processing of his/her personal data.

Below are the rights you have abroad; at Rabobank Group level, stemming from Rabobank Group Policies where your data is stored at Rabobank Group.

i. Right of access

You may ask us to view the data Rabobank has stored in relation to you, including your public online details and your CV and cover letter.

ii. Right of rectification

If your data is incorrect, incomplete or in violation of the law, you can request us to have it rectified.

iii. Right to be forgotten

You can ask that data recorded in relation to you be deleted if you object to this data being processed. This might be the case, for example, if the processing is unlawful or no longer necessary for the purposes for which it was collected.

iv. Right to restrict processing

In some cases, you may request that the processing of your personal data be restricted. This means that a smaller amount of data is processed (this is the case, for example, when your CV is updated).

v. Right not to be subject to automated decision-making

'Automated decision-making' refers to decisions made by computers rather than people. We currently do not use automated decision-making in the job application process.

vi. Right to data portability

Data which has been provided to us based on an agreement and/or with your consent may be transferred to a third party. This can be facilitated only if it is technically feasible. Rabobank Group will transfer the data you have provided yourself in a structured and readable format.

vii. Right to object

You have the option to object to the processing of your personal data. In this case, we will make a reassessment in order to verify that it is accurate that your data can no longer be used for this purpose. We will also always inform you of our decision.

8.1 Procedure

If you submitted one of the requests described above, we will respond to your request within 30 days of receipt. If the data you provided also contains third-party data, such third party may be requested in advance whether they object to their data being processed. You may be asked to further specify your request. We may also ask you to provide ID because we want to make certain that we are providing data to the right person. In some cases we may not be able to honour your request. For example, we will not delete the data if there is a statutory obligation to retain it. We will notify you if this is the case.

9. Where can I address my question or complaint?

For questions and requests about the processing of personal data, you should contact Rabobank A.Ş. HR Department, who can be reached via the following emails; ik@rabobank.com.

If the response is unsatisfactory, your application is rejected or not responded within 30 days, you may submit your complaint to Personal Data Protection authority.

10. Can we amend our Privacy Statement?

The Privacy Statement may be modified from time to time. If there is new data to be processed, we will amend the Privacy Statement accordingly. You will be able to find the most up-to-date version of our Job Applicants Privacy Statement on our website, along with previous versions of this Statement.

Rabobank A.Ş.

Address	:	Esentepe Mah. Büyükdere Cad. Bahar Sok. River Plaza No: 13 K: 7 Ofis No. 15-16 Şişli/İstanbul
Telephone	:	+90 212 708 46 00
Fax	:	+90 212 708 46 99
Website	:	www.rabobank.com.tr
E-mail	:	ik@rabobank.com