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**Norther Offshore Wind Farm**

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## 1 Document Information

### 1.1 Document Revision

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### 1.2 Document References

Ref	Doc. Number	Description	Rev	Author	Date

### 1.3 Distribution List

Rev	Issue Date	Issued To	Company	Function

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## 2 Privacy Statement Applicants

With this statement, we at Norther NV (“Norther”), like to inform you about the personal data Norther processes, how Norther processes this data, the reasons for processing it, and your rights to exercise control over the personal data held by Norther when you apply for a position with us.

In this privacy statement, “personal data” refers to any information about an identified or identifiable natural person (“the data subject”). An identifiable natural person is someone who can be identified directly or indirectly, particularly by reference to an identifier such as a name, identification number, location data, online identifier, or to one or more elements specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

### **ARTICLE 1. GENERAL**

- 1.1. Your personal data are processed by Norther acting in the capacity of controller.
- 1.2. The contact details of our head office are as follows: Norther NV, Esplanadestraat 14, 8400 Ostend (Belgium), with enterprise number 0896.052.742. For questions or complaints about the processing of your personal data by Norther, please contact us by e-mail to the following e-mail address: [privacy@norther.be](mailto:privacy@norther.be).
- 1.3. You should interpret the terms in this statement as referred to in the Regulation (EU) 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 and repealing Directive 95/46/EC (General Data Protection Regulation or GDPR).
- 1.4. Where this statement refers to legislation, collective labour agreements or other regulations, possible amendments to this legislation, collective labour agreements or regulations are implied in the reference.
- 1.5. We reserve the right to amend and modify this statement at our discretion. Such amendments and modifications will be communicated via e-mail and/or be displayed in a visible manner.

### **ARTICLE 2. PROCESSING OF YOUR PERSONAL DATA**

- 2.1. As part of your application, we are required to process your personal data. Below, we outline the categories of personal data we process, along with the legal grounds and purpose of the processing. In all cases, we limit the extent of the processing to what is necessary to achieve the objectives described below.

## 2.2. ASSESSMENT AND FOLLOW-UP OF YOUR APPLICATION

<p><b>Personal Data:</b></p>	<p>In the context of your application, we typically process:</p> <ul style="list-style-type: none"> <li>• your identity and contact details (such as name, email address, and phone number),</li> <li>• your CV and the information it contains,</li> <li>• your photo (if applicable),</li> <li>• your degree(s),</li> <li>• information from or provided by specialist consultants, and</li> <li>• your motivation (if applicable).</li> </ul> <p>We may obtain your motivation directly from you (e.g., through an interview or motivation letter or inferred from a conversation with you) or from a third party by contacting a reference person (see Article 3.2).</p>
<p><b>Legal Basis:</b></p>	<p>For this processing, we rely on the necessity of processing your personal data to enter into a contract with you (Article 6.1(b) GDPR). If you are hired, our Employee Privacy Statement will apply, and we will rely on the employment contract between us to retain your application data in your personnel file (Article 6.1(b) GDPR).</p> <p>If we decide not to hire you, we will include your data in our recruitment reserve if you have consented (Article 6.1(a) GDPR). If you have not consented, we will delete your data once the recruitment process for the vacancy you applied for is fully and definitively completed (see Article 4.2).</p>
<p><b>Purpose:</b></p>	<p>To assess your application and, if applicable, to contact you for an (online) interview or to make you a job offer.</p>

## 2.3. OUR RECRUITMENT RESERVE

<p><b>Personal Data:</b></p>	<p>For the purposes of our recruitment reserve, this includes the same data as for the assessment of your application (see article 2.2).</p>
<p><b>Legal Basis:</b></p>	<p>For the processing of this data, we rely on your consent (Article 6.1(a) GDPR). You can withdraw your consent at any time by contacting us.</p>

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<b>Purpose:</b>	To include you in our recruitment reserve and to contact you for other potential job offers that match your profile.
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**2.4. OTHER PROCESSING OF PERSONAL DATA**

To the extent that your Personal Data is not necessary for contract execution or compliance with legal obligations, we may process your Personal Data based on our legitimate interests:

- 2.4.1. All categories of Personal Data mentioned above may be processed to safeguard our evidence in the context of (potential) disputes. For this purpose, we rely on the necessity of processing for the pursuit of our own and third parties' legitimate interests (Article 6.1(f) GDPR), which primarily consist of safeguarding these interests in court.
- 2.4.2. All categories of Personal Data mentioned above may be processed to inform third parties in the context of potential mergers, acquisitions, demergers, or similar corporate transactions. Here, we rely on the necessity of processing to serve our own and third parties' legitimate interests (Article 6.1(f) GDPR), mainly to enable corporate transactions.

**ARTICLE 3. FROM WHOM DO WE RECEIVE YOUR PERSONAL DATA?**

- 3.1. In principle, we receive your Personal Data directly from you as part of your application. However, in certain cases, we may also receive information about you from third parties, as further explained in this article.
- 3.2. We may receive Personal Data from one or more of your former employers or clients:
  - 3.2.1. If you provide us with a reference contact (e.g., in your CV), we consider this as an invitation to contact that reference. We may reach out to this reference to gather additional information about you for the purposes mentioned above.
  - 3.2.2. If you provide us only with the company name of one or more previous employers or clients, we will inform you if we intend to contact any of these employers or clients. This allows you to provide a contact for the reference, should you wish to. You may withdraw your application at any time.
- 3.3. We may collect publicly available Personal Data from the internet or your social media. Generally, we only consult publicly accessible information about you online. However, in specific cases, we may include relevant publicly available data in your profile if we deem it pertinent to the role for which you are applying. If you do not wish us to consult your social media or publicly accessible internet information as part of your application, we advise adjusting your social media privacy settings or contacting us.
- 3.4. We may receive Personal Data through recruitment agencies. Some recruitment agencies we collaborate with share your anonymized profile initially, without contact details, making it impossible to identify or contact you directly. If we are interested in your profile, we will request

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your details to contact you, at which point we inform you of this privacy statement. In cases where recruitment agencies provide your contact information beforehand, we ensure that the agency has obtained your consent to share your Personal Data. We enter into the necessary agreements with our recruitment agencies to this effect..

#### **ARTICLE 4. RETENTION PERIOD**

- 4.1. We only process your Personal Data for as long as is necessary to fulfill the purposes described above, or, where consent is provided, until you withdraw that consent. Below, we provide information to help you understand how long we retain your identifiable Personal Data.
- 4.2. We retain all Personal Data collected as part of your application for the duration of the recruitment process and until the full and final conclusion of the process, usually not exceeding three months. Thereafter, we delete your Personal Data unless (1) we hire you (see Article 4.3), (2) the recruitment process is exceptionally ongoing, or (3) you agree to allow us to retain your Personal Data as part of our recruitment pool. In most cases, you will receive an email within three months of your application, requesting your consent to retain your Personal Data. If you consent, we retain your data for two years from that consent date.
- 4.3. If we decide to hire you, your Personal Data will be retained for the duration of your employment or contract with us, and for up to five years following the end of that period. We will separately inform you about data processing related to your employment or contract.
- 4.4. As a general rule, we will de-identify your Personal Data once it is no longer needed for the purposes described above or the retention period as outlined in this article has expired. We will only retain your Personal Data for longer if required in the context of a dispute or if we are unable to delete your Personal Data due to a legal or regulatory obligation or a judicial or administrative order prohibiting data deletion.

#### **ARTICLE 5. RECIPIENTS OF YOUR PERSONAL DATA**

- 5.1. In principle, we do not share your Personal Data with anyone other than the people who work for us and the suppliers who assist us in processing your Personal Data. Anyone who has access to your Personal Data is always bound by strict legal or contractual obligations to treat your Personal Data securely and confidentially. This means that only the following categories of recipients will receive your Personal Data:
  - You;
  - Our employees and suppliers;
  - Public authorities, judicial bodies, or regulatory authorities to the extent we are required to share your Personal Data with them (e.g., tax authorities, police, or judicial authorities).

#### **ARTICLE 6. TRANSFER OF YOUR PERSONAL DATA**

Your Personal Data is not, in principle, transmitted outside the European Economic Area (EEA) (the EEA includes the EU, Liechtenstein, Norway, and Iceland). We will only transfer your Personal Data

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outside the EEA when necessary for the aforementioned purposes. Should such a transfer occur, we will ensure adequate safeguards are in place to protect your Personal Data during the transfer (e.g., by entering into a contract based on data protection standard clauses approved by the European Commission).

#### **ARTICLE 7. SECURITY OF YOUR PERSONAL DATA**

- 7.1. We treat Personal Data as confidential information and process your Personal Data accordingly.
- 7.2. We take appropriate technical and organizational measures to adequately protect your Personal Data against loss, alteration, or unauthorized disclosure or access during transmission, storage, or other processing. For example, access to your Personal Data is restricted to only those individuals who, in light of their role and the purposes, require access to it.
- 7.3. Despite appropriate security measures, breaches cannot be completely ruled out. If a breach of the security or confidentiality of your Personal Data occurs and carries a high risk to your rights and freedoms, we will inform you of the breach as soon as possible.

#### **ARTICLE 8. YOUR RIGHTS**

- 8.1. In accordance with the GDPR, every applicant has, among other things, the right to be informed, to access their Personal Data, to correct their Personal Data, to delete their Personal Data, to transfer the Personal Data they provided, not to be subject to fully automated decision-making, to object to the processing of their Personal Data, and to file a complaint with the territorial supervisory authority. In Belgium, this is the Data Protection Authority (GBA).
- 8.2. Employees may exercise these rights under the General Data Protection Regulation (GDPR). To exercise any of your rights, you may submit a written request to [privacy@nortner.be](mailto:privacy@nortner.be), specifying the right your request concerns. You are also welcome to generate your request by following the steps at <https://www.rightso.eu>. However, the use of this online tool is not required to submit such a request.