

PRIVACY REGULATIONS

GUYRA ARBODIENST

Article 1 Definitions

Unless otherwise expressly provided below, terms in these regulations are used in the meaning ascribed to them by the AVG. The Data Protection Officer of Guyra Arbodienst has registered with the Personal Data Authority and is registered under FG 003207 (Guyra)

Personal data Health data

Processing of personal data

Provision of personal data Collection of personal data Controller

User Controller

Data subject Processor

Third party

Recipient

Express consent

AP Employee

: Any data relating to an identified or identifiable natural person.

: Special personal data relating directly or indirectly to the physical or mental condition of data subjects.

: Any operation or set of operations involving personal data, including in any case the collection, recording, organisation, storage, updating, modification, retrieval, consultation, use, provision by means of transmission, dissemination or any other form of making available, bringing together, linking, as well as blocking, erasure or destruction of data.

: Disclosing or making available personal data.

: Obtaining personal data.

: The natural person, legal entity or any other person who alone, or together with others, determines the purpose of and the means for processing personal data.

: Any person who, under the authority of the controller, is authorised to process personal data.

: The person who, on behalf of the responsible party, is entrusted with the daily care of the management of data processing.

: The person to whom personal data relates. : The person who, on behalf of the responsible party

The person who processes personal data on behalf of the responsible party, without being subject to his direct authority.

subject to his direct authority.

: Any person other than the data subject, the controller, the user, or the processor.

: The person to whom personal data are disclosed.

: Any freely-given, specific and informed expression of expression of will by the data subject by which he/she accepts the processing of personal data relating to him/her. With employees being dependent on employers, onerous requirements apply to the consent requirement.

: Personal Data Authority

: The person responsible under the controller for processing of personal data. A distinction is made between Employee A, who does not process medical data in the performance of his/her duties, and Employee B, who does process medical data in the performance of his/her duties.

Article 2 Scope, management and processing

2.1. These Regulations shall apply to any processing, automated or otherwise, of personal data by/on behalf of the Controller. The responsible party within the meaning of these regulations is Guyra Arbodienst in Rotterdam.

2.2. Guyra Arbodienst guarantees that it complies with all applicable privacy laws and regulations, including the Personal Data Protection Act, the Individual Healthcare Professions Act (Wet BIG), the Medical Treatment Agreement Act (WGBO; to the extent applicable), the Medical Examinations Act and applicable codes of conduct and guidelines.

2.3 These regulations lay down rules for the personal registration of Guyra Arbodienst. The management holds the registration and manages it in accordance with these regulations.

2.4 The management of Guyra Arbodienst supervises the proper functioning of the registration in accordance with these regulations and agreements mentioned in the previous paragraph and is responsible for the proper functioning of the personal registration.

2.5 With regard to the registration, the management has no more powers than those granted to it in these regulations. Its control over the operation of the registration of persons and the provision of data from that registration shall be limited by these regulations.

2.6 The management shall be liable for any damage resulting from non-compliance with these regulations.

2.7 The administrator designated by the management is Ms Sandra van Ooijen.

2.8 An internal audit is carried out periodically with the main objective of verifying that all employees within Guyra Arbodienst comply with the privacy agreements and the privacy regulations.

Article 3 Purpose of data processing

3.1 The purpose of the personal data registration is to record data provided by clients and clients and collected by Guyra Arbodienst itself for the purpose of reporting to clients regarding the reintegration and absenteeism supervision of employees (based on the KNMG code "data traffic and cooperation in labour absenteeism and

reintegration from 2007" and medical examinations. It should be noted that clients may also enter data relating to actions performed by them.

3.2 No personal data shall be included in the personal records for purposes other than those indicated above. The use of recorded personal data shall only take place in accordance with this objective.

3.3 Only clients in respect of whom Guyra Arbodienst has been asked by a client to advise on work (dis)suitability and work possibilities and medical examinations are registered in the personal data register.

3.4 The registration contains at most the data mentioned in Annex A to these regulations.

Article 4 Conditions for lawful processing

4.1. Personal data shall only be processed insofar as they are adequate, relevant and not excessive in view of the purposes described in Article 3.

4.2. Personal data shall only be processed by persons who are bound to secrecy by virtue of office, profession or statutory regulation, or by virtue of an (employment) agreement.

4.3. Personal data shall be processed for the purposes described in Article 3 and shall not be further processed in a manner incompatible with the purposes for which they were obtained.

4.4. Personal data shall only be processed if one of the processing grounds in Article 8 of the Personal Data Protection Act applies.

4.5. The responsible party shall maintain secrecy about the personal data of which the responsible party becomes aware, except insofar as any statutory provision obliges the responsible party to disclose or disclosure arises from the responsible party's duties.

4.6 Guyra Arbodienst complies with Article 9, 2nd paragraph, letter h of the EU-AVG "Processing of special categories of personal data". On this basis, Guyra and Medimark fall under the general grounds for exemption from the processing ban. The processing includes personal data as well as medical information necessary for purposes of preventive or occupational medicine, for the assessment of fitness for work of the employee/elector concerned, medical diagnoses (...)"

Article 5 Working method of personal registration

5.1

The working method Guyra :

a. client employees are recorded in the digital absence system

b. the company doctor or task-delegation case manager records the examination data, the consideration and conclusion in the digital absenteeism system (medical section).

c. the employer is shown a layman's section. This contains no medical aspects.

d. medical matters are recorded in the protected medical file. This is exclusively viewable by the company doctor and his assistant (case manager) working in delegated tasks.

5.2 In consultation with the manager, the management will draw up security regulations for the personal records.

Article 6 Recorded data

6.1. All employees may process data to the extent necessary in the performance of their duties. This concerns at least the following data:

- The work to which the employee is or is no longer capable;
- The expected duration of absenteeism;
- The degree of the employee's incapacity for work;
- Any adjustments or work facilities that the employer needs to make as part of the reintegration of the person concerned.
- Test results

6.2 The company doctor is also to be regarded as responsible. Insofar as an employee is delegated tasks by the company doctor, the employee may process personal data which are necessary to perform these tasks. This employee is designated as Employee B (Task Delegation). Based on the law (including the BIG Act, and the WBGO, as applicable) and applicable codes of conduct, the company doctor has a far-reaching duty of confidentiality, with strict privacy safeguards. Employee B, insofar as he/she performs work delegated by the company doctor, has a derived strict confidentiality obligation, which is also laid down in a confidentiality declaration.

The company doctor is also responsible for PAGO examinations and occupational examinations carried out by Medimark doctors. The doctors have signed a supervision agreement. The secretariat has signed a task delegation agreement with the company doctor.

6.3. By the persons mentioned in article 6.2, with due observance of the provisions of these regulations, they may in any case view the data in appendix A.

6.4 If the company doctor is succeeded by another company doctor, he/she may process personal data if the person concerned has no objection to this.

Article 7 Digital access to personal data

7.1 Consultation of data qualifies as processing within the meaning of the AVG. The above is therefore applicable.

7.2. Guyra Arbodienst uses absenteeism system absenteeism signal. Employees only have access to those parts of the absenteeism system that they must have access to for the proper performance of their duties.

7.3. The administrator and those working within the framework of an assignment given by the responsible party or user only have access to personal data insofar as this is necessary for the use and processing of the data and they have signed a confidentiality declaration to this end.

7.5 Anyone having access to the registration shall have a duty of confidentiality in respect of the data of which they have become aware by virtue of such access. A written declaration shall be signed for this confidentiality.

Article 8 Provision of personal data

8.1. Subject to the provisions under or pursuant to the AVG and the AP's rules for the processing of personal data of sick employees ("The sick employee and privacy"), personal data will be provided without prior consent of the data subject to:

Principals

UWV

Preventive medical examination Working conditions consultation

: Feedback from consultations. The feedback does not include medical data and terms. Only possibilities and limitations are reported.

: The occupational health and safety service or company doctor is obliged to provide the UWV on request with the data required for the UWV to perform its duties. Given the privacy protection of the employee and the medical secrecy resting on the company doctor, a company doctor may only provide the (strictly) necessary "medical data" concerning the sick employee.

: Management report only.

: The employer is not informed if an employee visits the working conditions consultation

visits.

Occupational examinations Only fit or unfit, certificate and/or pass, no medical data.

Article 9 Provision of information to data subject

9.1. If personal data are obtained from the data subject, the responsible party will inform the data subject before the time of obtaining:

- his identity;

- the purposes of the processing for which the data are intended, unless the data subject data subject is already aware of this.

9.2. The responsible party shall provide further information insofar as, in view of the nature of the

data, the circumstances under which they are obtained or the use made of them is necessary to ensure proper and careful processing vis-à-vis the data subject.

Article 10 Right of access and copy of recorded personal data

10.1 Any person concerning whom data have been recorded in a personal data register may inspect such data at his request.

10.2 A request for perusal shall be submitted in writing to the management of Guyra Arbodienst.

10.3 The request for perusal shall be dealt with within one month after receipt of the request.
dealt with.

10.4 The requested perusal, with the necessary explanation, shall be granted to the requesting person in person granted, by showing the data relating to that person. The requester must provide proper identification.

10.5 Inspection implies the right to printed documents of the data concerned.

10.6 A request for perusal or issue of copies may be refused if the stipulations of paragraph 4 are not satisfactorily met.

stated in paragraph 4 is not sufficiently fulfilled.

10.7 Inspection or issue of printed documents may also be refused if important interests of others than the applicant, including Guyra Arbodienst, make this necessary.

necessary. A refusal of inspection is motivated by reasons.

10.8 Inspection is free of charge; on request the privacy regulations will be sent by e-mail. Our website website the privacy regulations are freely available.

10.9 Inspection can also take place by a confidential adviser authorised in writing by the registered person.
the registered person.

Article 11 Right to blocking, addition and correction of recorded personal data

11.1. If requested, the recorded data shall be supplemented by a statement issued by the data subject in respect of the recorded data.

11.2. The data subject may request the correction or blocking of data relating to him or her if they are factually inaccurate, incomplete for the purpose of processing, irrelevant or contrary to a legal requirement. The data subject may have his/her opinion included in the file by means of a supplement.

11.3. Within four weeks of receiving the written request for correction or addition, the data controller will inform the applicant in writing whether or to what extent it complies with the request. Any refusal shall be reasoned.

11.4. The responsible party shall ensure that a decision to correct is implemented as soon as possible.

Article 12 Right to destruction of recorded personal data

12.1. The data subject may request in writing the destruction of data relating to him/her. If the preservation is of substantial interest to a person other than the data subject or if there is a statutory duty to preserve the data, the data will not be destroyed.

12.2. Within four weeks of receiving the written request for deletion or destruction, the responsible party will inform the requester in writing whether or to what extent it complies with the request. Reasons shall be given for any refusal.

12.3. The data controller shall delete or destroy the data within three months of a request to that effect by the data subject, unless it is reasonably plausible that the retention is of substantial interest to a party other than the data subject, as well as insofar as retention is required pursuant to a statutory provision.

Article 13 Right to object to the processing of personal data

13.1 If data are subject to processing pursuant to Article 4.4, the data subject may file an objection with the responsible party in connection with his/her particular personal circumstances if there is a legitimate interest.

13.2 Within four weeks of receiving the objection, the responsible party will assess whether the objection is justified. If the objection is justified, it will immediately terminate the processing.

13.3 The data controller may charge a fee for handling an objection (Decree on cost reimbursement for rights of data subjects under the WBP, Official Gazette 2001 305). The fee will be returned in the event the objection is found to be well-founded.

Article 14 Notification of processing of personal data

14.1 The data controller shall announce the following to the data subjects:

- the existence of the file containing personal data;
- the purpose of the processing of personal data;
- the existence of these regulations for the management and processing of personal data;
- the manner in which the contents of these Rules may be inspected.

Article 15 Complaints

15.1. If a data subject or an interested party is of the opinion, that the responsible party acts contrary to the provisions of these regulations, a reasoned complaint may be submitted in writing to the responsible party.

15.2. Submitted complaints will be dealt with by the responsible party in accordance with the complaints regulations of Guyra Arbodienst and Medimark. See our website for this.

Article 16 Retention periods

16.1 In compliance with any statutory regulations (including KNMG), we have set the retention period of medical data at 20 years.

16.2 If the retention period of paper files has expired, the personal data concerned will be destroyed within a period of one year.

Article 17 Data security

Guyra Arbodienst has taken appropriate organisational and technical measures to secure the Processing of Personal Data against loss or impairment of the data and against unauthorised access, modification or provision thereof. Automated records are only accessible via the authorisation codes and/or passwords known only to Users.

Digital data

Electronic personal data is secured in such a way that unauthorised persons cannot access it. The highest possible level of security is applied.

Paper data

Where there is personal data on paper, these are stored in lockable cabinets. Only authorised employees have access to the key to these cabinets.

Consultation rooms

Guyra Arbodienst, when accepting a new assignment in the context of health and safety services, imposes conditions on the location and layout of the examination room for its employees. Broadly speaking, these are: the room cannot be seen from the hallway, the walls are sufficiently insulated so that conversations in adjacent rooms cannot be heard.

Office

Our office cannot be entered freely. Access control is in place. In addition, we have taken various measures against burglary and fire.

Article 18 Transfer of personal data

18.1. If files are transferred to another controller, the rules set out in these regulations shall continue to apply.

18.2. Personal data will only be transferred to another controller if this is in accordance with the law and further specific requirements set by the AP.

Article 19 Accommodation

19.1 When accepting a new assignment in the context of occupational health and safety services and medical examinations, Guyra Arbodienst applies conditions to the siting and furnishing of the examination room for its employees. Broadly speaking, these are:

- the room cannot be seen into from the corridor;
 - the walls are sufficiently insulated so that conversations in the adjacent rooms cannot be heard
- are audible.

Article 20 Internal instructions employees Guyra Arbodienst

20.1 Employees of Guyra Arbodienst may only provide targeted information and advice to the employer on:

- the work the employee is or is not yet capable of doing (functional limitations, residual possibilities and implications for the type of work the employee can still perform);
- the expected duration of the absence;
- the degree of the employee's incapacity for work;
- any adjustments or work facilities, which the employer needs to make as part of the reintegration.
- Group medical examination reports
- Fit or unfit in an occupational examination.

20.2 Other relevant ("medical") information may only be provided if the employee has explicitly authorised the company doctor to do so.

20.3 All employees of Guyra Arbodienst sign a confidentiality clause upon commencing employment, stating that client and client data will be treated confidentially.

20.4 Within Guyra Arbodienst, company doctors work closely with the medical secretariat and the case manager in task delegation. In terms of confidentiality, they work under "delegated tasks".

Article 21 Data breaches

If Guyra Arbodienst is faced with (suspected) data breach, we follow the following procedure:

- Any suspicion on a security incident or a data breach is reported immediately to data protection officer
- In consultation with the Medical Advisor, the Data Protection Officer determines whether there is a data breach or a security incident.
- If there is a data breach, they discuss who is the most appropriate party to make a report to the Data Protection Authority.
- In case of a serious data breach, the data protection officer informs the data subject about the data breach and the notification to the Personal Data Authority.
- The data protection officer shall take the initiative to carry out an analysis to prevent a similar data breach in the future.

Article 22 Entry into force and duration

22.1 Subject to statutory provisions, these regulations shall be in force as long as Article 3 applies, subject to Article 16.

22.2 These regulations shall enter into force on 1 May 2020.

22.3 Amendments to these regulations shall be made, stating the date, by the responsible party. Amendments to these regulations shall take effect one month after their publication.

ANNEXES

ANNEX A Data recorded within the registration system

Within our systems, the following data relating to individuals are recorded.

Data group Client	Data elements
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- | | |
|--------|---|
| Client | <ul style="list-style-type: none"> - personnel number - Citizen Service Number (only in the case of actual absence) - name - address - place of residence - Telephone - email - date of birth - gender - telephone number(s) - profession or function - department - department number - date of employment - type of employment, percentage fte - disability status, effective date and percentage - status disabled - date of notification of illness and recovery - Number of driving licence or passport at Medimark |
|--------|---|

Customer

- UWV registration number
- name
- Address
- place of residence
- contact details
- debtor number
- call location
- client number
- job number

Advisory data

- order type
- advice date
- content of advice
- reports of intervention companies
- Functional Possibilities List
- PMO trajectory report
- Approval and/or disapproval vocational examination

Medical data

- current opinion
- UWV medical information
- medical file