

privacy notice.

risesmart.

introduction

This privacy notice applies to the processing of personal data we process about you when we provide our Services to you, including when you visit our Risesmart websites or use our mobile app, or when your data is provided to us by client (such as a municipality or employer) within the framework of a specific guidance or mediation process, and when we provide you with our services, such as:

- Coaching
- Outplacement
- Internal mobility
- Participation ("Participatie"), i.e. to help you as a job seeker return to sustainable employment in the context of statutory objectives imposed by the government to assist individuals further from the labor market in finding work
- Reintegration ("Reintegratie"), i.e. advisory services for reintegration within the own organization (track 1), outside the own organization (track 2), or from a benefit situation (Eigen Risico Drager/ERD)
- Baanbrekend, i.e. advisory services to help job seekers further from the labor market, for example due to benefits or long-term unemployment, return to long term employment

Your privacy and the security of your personal data is important to Randstad Risesmart and the rest of the Randstad Group companies. We are responsible for ensuring that all personal data entrusted to us is processed in accordance with applicable data protection legislation.

This notice explains who we are, for what purposes we may use your personal data, how we handle it, to whom we may disclose it (like service providers and/or other Randstad Group Companies), where it may be transferred to or accessible from, and what your rights are.

about Randstad Risesmart B.V

Randstad Risesmart B.V. (referred to in this notice as: “we” or “us” or “Risesmart”), will process your personal data in accordance with this data protection notice (such personal data sometimes also referred to as “information”).

Except as otherwise set out below, Risesmart is the controller of the personal data (‘controller’ within the meaning of applicable data protection legislation).

what personal data do we process about you and why

As a participant in our Services, we collect and process the following personal data about you as described below:

Purpose(s) for processing	Categories of personal data	Legal basis for processing
To invite you to your program: if provided by your employer or yourself, we will process your personal data to invite you to make use of our Services.	Identification and contact data: your name, work or personal email address, phone number, job title (to the extent provided)	Our legitimate interest to offer you our Services and to invite you to your program
To provide our coaching Services to you: we will process your personal data to connect you with coaches, and to provide you with tools and resources to support your development at work. This includes skill assessments, addressing your challenges and understanding your personal strengths and weaknesses, and to help you identify areas of personal development.	Identification and contact data: your name, work or personal email address, phone number, country of residence, languages spoken, and other similar information as shared by you Professional information: personal data related to your work including information like your job title, description and location, your department, and other similar information as shared by you CV information: CV/resume, work history, information about your skills, your experience and educational background and other relevant information present on your CV or as shared by you Assessment and exercises information: information and/or responses provided	Our legitimate interest to provide you with our Services

	by you, including recordings, when you take part in assessments, quizzes, exercises, and their results	
To provide our outplacement Services to you: we will process your personal data to connect you with coaches, and to provide you tools and resources to support you in finding new employment. This includes providing you with skill assessments, addressing challenges and understanding your personal strengths and weaknesses, resume/CV support by a certified Branding Expert, tailored job leads and (provided you opt in) our FirstLook functionality, and personal development support.	Identification and contact data: your name, work or personal email address, phone number, country of residence, languages spoken, and other similar information as shared by you Professional information: personal data related to your work including information like your job title, description and location, your department, and other similar information as shared by you CV information: CV/resume, work history, information about your skills, your experience and educational background and other relevant information present on your CV or as shared by you Assessment and exercises information: information and/or responses provided by you, including recordings, when you take part in assessments, quizzes, exercises, and their results	Our legitimate interest to provide you with our Services
To provide our redeployment Services to you: we will process your personal data to provide you with career coaching and to match your goals, skills, and experience with new relevant opportunities with your employer.	Identification and contact data: your name, work or personal email address, phone number, country of residence, languages spoken, and other similar information as shared by you Professional information: personal data related to your work including information like your job title, description and location, your department, and other similar information as shared by you	Our legitimate interest to provide you with our Services

	CV information: personal data on or about your CV/resume, work history, information about your skills, your experience and educational background and other relevant information present on your CV or as shared by you Assessment and exercises information: information and/or responses provided by you, including recordings, when you take part in assessments, quizzes, exercises, and their results	
To provide optimal guidance during your reintegration within your own organization (Track 1), outside your own organization (Track 2), or from a benefit situation (ERD), we process your personal data in order to, among other things: comply with potential statutory obligations under the Wet Verbetering Poortwachter, whereby we connect you with our coaches and potential case managers for intensive guidance, to stimulate your personal development by mapping out your capacities via career advice, education, workshops, courses, and assessments, and promote your return to work (“activering”) through training and active mediation toward potential employers; in addition, we use your data to prepare the required file, process plans, action plans, and progress and final reports to the employer, municipality, or the UWV (Employee Insurance Agency), as well as for loss mitigation within the context of ERD.	Identification and contact data: your name, work or personal email address, phone number Professional and career details: CV/resume, work history, information about your skills, experience, and educational background, and other relevant information present on your CV or shared by you, functional capacities and limitations (without medical details), process plans, and progress reports.	Our legitimate interest to provide you with our Services Contract: The processing is necessary for the execution of a contract or agreement Legal obligation: Complying with the Wet Verbetering Poortwachter. The client has a legal obligation and for which it may engage a third party (Randstad Risesmart). Legitimate interest: Loss mitigation (ERD) and execution of the reintegration into work.
We process your personal data to intensively guide you as a job seeker further from the labor market—for example, due to receiving benefits, long-term unemployment, your status as an asylum seeker or right to remain status holder, or as a youth dealing with debt issues within a specific municipal or public-private project	Identification and contact data: your name, work or personal email address, phone number Professional and career details: CV/resume, work history, information about your skills, experience, and	Our legitimate interest to provide you with our Services Contract: The processing is necessary for the execution of a contract or agreement.

(Baanbrekend) to help you return to long term employment. Through our project advisors and coaches, we stimulate your personal development and employability by means of job coaching, career advice, training, education, workshops, and assessments; additionally, we use your data to proactively introduce you to potential employers within our network and to make targeted assessments to determine your qualification for specific (wage cost) subsidy schemes, wage cost benefits, or Social Return projects; furthermore, we use your data to prepare the required files, process plans, action plans, and progress and final reports to the commissioning employer, relevant municipalities, the UWV, and relevant network organizations (such as regional employer service points (WSP), and social partners involved in your return to work ("activering") or debt relief services).	educational background, and other relevant information present on your CV or shared by you, functional capacities and limitations (without medical details), process plans, and progress reports. Project-specific context data: (if necessary for the execution of the municipal project, such as civic integration/asylum application or participation in specific debt relief programs, without processing medical details).	Legal obligation: The client has a legal obligation under which personal data may be exchanged between the Client and Risesmart.
We process your personal data to help you return to long term employment as a job seeker further from the labor market, and to guide you within the framework of the Participatiewet and the banenafspraak, i.e. in order to intensively guide you via our coaches, whereby we stimulate your personal development and employability by means of job coaching, training, education, workshops, and assessments; in addition, we use your data to proactively introduce you to potential employers within our network and to make targeted assessments regarding whether you qualify for specific subsidy schemes, wage cost benefits, or Social Return projects, and to comply with statutory objectives to help individuals further from the labor market find work, as well as to report to the client, municipality, and/or the UWV.	Identification and contact data: your name, work or personal email address, phone number Professional and career details: CV/resume, work history, information about your skills, experience, and educational background, and other relevant information present on your CV or shared by you, functional capacities and limitations (without medical details), process plans, and progress reports. Type of (former) benefit, data regarding target group ("doelgroep") registration (on a pseudonymized basis). Status of a no-risk policy or entitlement to wage cost subsidies, explicitly without processing medical details or diagnoses.	Our legitimate interest to provide you with our Services Contract: The processing is necessary for the execution of a contract or agreement. Legitimate interest: Legitimate interest to process this data in order to determine the Client's entitlement to a subsidy or no-risk policy.

To manage our Services: we will process your personal data to manage your program, to report on your program status to our client, and to invoice our client.	Identification information: your name Program information: personal data about the type of program provided to you, information about coaching sessions, events, webinars etc. you have attended and your use of our platform, your program status	Our legitimate interest to manage our Services
When you use or otherwise visit them, we use your personal data to manage our website and mobile app, and for system administration purposes (e.g., diagnosing technical problems, analyzing the traffic to our website).	Device Usage Data: Internet Protocol (IP) address of your device, IP address of your Internet Service Provider, device screen resolution, device type (unique device identifiers), browser and operating system versions, geographic location (country/city), preferred language used to display, date and time of access to the website, internet address from which you were directly linked through to our website, operating system that you use, parts of the website that you visit, pages of the website that you have visited and the information that you viewed, actions you have performed	(a) Legitimate interest of managing our website and our app; and/or (b) Where (a) is not possible because local mandatory law requires so, only in those limited cases may this be based on consent
To improve our Services (including our website and mobile app): We make use of your personal data (by aggregating or deidentifying it where possible) to improve our services by for example building analytics so we can improve the quality of the content we deliver to you, or to improve your user experience when you use our website or our mobile app.	Professional information, CV information, assessment and exercise information, program information, device usage data, information related to your usage of our website and/or mobile app (aggregated or deidentified where possible).	(a) Legitimate interest of improving our Services, website and app; and/or (b) Where (a) is not possible because local mandatory law requires so, only in those limited cases may this be based on consent

We process your data where required for compliance with regulatory requirements like tax laws.	Personal data limited to what is required for the regulatory requirement.	Processing is necessary for compliance with legal requirements
Surveys (including satisfaction surveys): we may process your personal data to ask your opinion about our Services	Identification and contact information: your name and email address	Based on our legitimate interest to survey our participants so as to better understand their needs, to improve our Services and to build and maintain a good relationship with our participants
IT and operational support: we will process your personal data when providing you with IT, application, and/or operational support	Identification data: your name, user ID, email address, and any other personal data as required to resolve your support request.	Our legitimate interest to provide you with appropriate support during your program
IT security: we will process your personal data to ensure the security of our information assets by for example logging and monitoring actions	Information related to your usage of our website and/or mobile application like your user ID, Internet Protocol (IP) address of your device, login times, and actions that you have performed	Our legitimate interest in safeguarding our assets, information systems, and participant data
Facilities, security and contingency planning purposes	Identification and contact data: your name, mobile phone number and nationality. Visitor information: when accessing our buildings, we may collect your name, contact details, car plate number, identification, etc. for security reasons. CCTV footage: we may process footage of you obtained through our use of CCTV surveillance systems.	Our legitimate interest to safeguard and secure our assets, our facilities, our information systems and our people
For business management and management reporting: we will use your personal data to build insights into our service delivery, to develop business forecasting, and to provide reporting to our management	We will aggregate your personal data (like your program status and related information) so that you are not personally identifiable.	Our legitimate interest to organize and understand our business

To conduct corporate transactions (including mergers, acquisitions and divestments)	Your personal data as required and limited to what is necessary to conduct such corporate transactions.	Our legitimate interest in developing Randstad's business through mergers, acquisitions and divestment
Dispute management and litigation	Legal/Dispute Data: Personal data limited to what law enforcement authorities require us to disclose in connection with an investigation. Personal data limited to what is necessary for Randstad to defend its rights in connection with a dispute or with proceedings before a court of law (or other dispute resolution body).	Our legitimate interest to protect Randstad company assets, our legal interests, to manage legal claims/disputes with our clients and other third parties
HR services: We process your data for HR administration purposes and when entering into an employment, staff, or placement relationship with you, to comply with laws and regulations, including but not limited to identification, labor law, tax and social security legislation, pensions, fraud prevention, and national and international sanctions legislation, as well as for personnel and payroll administration and reintegration.	General contact and identification details: Name, address, email address, phone number, date of birth. Government and identification details: Citizen Service Number (BSN), nationality, type, number, and validity period of the identity document. If applicable: a valid residence and/or work permit (in the case of a foreign national from outside the EU/EEA or Switzerland). Copy of identity document: We only store a complete copy of your identity document if we are legally required to do so (for example, when entering into a formal employment contract). In other cases, we only process the specific characteristics of the document (such as the document number) without storing a copy. Data for screenings and clearances: If required for the position: a Certificate of Good Conduct (Verklaring Omtrent het	Our legitimate interest to provide you with our Services Contract: The processing is necessary for the execution of a contract or agreement. Legal obligation: Necessary to comply with legal obligations, such as the obligation to provide identification, tax legislation (deduction of payroll tax), and social security legislation.

	Gedrag - VOG) or data regarding an A1 certificate. Career, salary, and absence details: Other data necessary for accurate personnel, payroll, hours, and absence registration (including compliance with reintegration obligations). Additional data for ZZP-er, freelancers / self-employed individuals: Chamber of Commerce (KvK) information, VAT number, details regarding business liability insurance, and the entrepreneurship checklist.	
Quality purposes and certification: We process your data (such as your program status and file records) for internal quality controls and external audits conducted by independent bodies.	Identification and contact details: name, Citizen Service Number (BSN), personnel number. Program and process details, file records, process steps: (obtained through random sampling, where data is anonymized or masked wherever possible). Target group and status data: If necessary for specific (PSO) certification: the indication of a (former) benefit situation, target group ("doelgroep") registration (such as status in the UWV doelgroepregister), or the presence of a no-risk policy or wage cost subsidy. This occurs without processing medical details.	The processing is necessary for the legitimate interests of Randstad, including internal and external audits to demonstrate compliance with statutory quality requirements, industry certifications, and quality marks (such as ISO certifications, PSO certification, or specific quality marks for reintegration and outplacement).
Execution of "Eigen Risico Drager" (ERD): If we (or an affiliated entity within the Randstad Group) are the "eigen risico drager" for your Ziektewet or WGA benefit, we process your data for the execution of our statutory ERD duties.	Identification and contact details: name, address, Citizen Service Number (BSN), personnel number.	Legal obligation: Complying with the statutory obligations resting on the ERD in accordance with the Ziektewet, the Wet werk en inkomen naar arbeidsvermogen (WIA), and the Wet structuur

This includes the financial and operational administration of the benefit, claims management, conducting objection and appeal procedures against UWV decisions, and drawing up and executing a legally mandated reintegration trajectory to mitigate financial loss.	Financial data: salary history, benefit amount, daily wage. Reintegration and absence data: date of sick leave notification, return to work notification, functional capacities and limitations established by the company doctor- explicitly without medical details or diagnoses - action plans, and progress reports.	uitvoeringsorganisatie werk en inkomen (SUWI). Legitimate interest: loss mitigation and protecting the financial position of the company.
To contact you regarding commercial offers, newsletters, and promotional campaigns that may be of interest to you. This may also include sharing internal job vacancies within Randstad Group Netherlands (if you are open to a career within our own organization).	Name, email address, phone number, job preferences, and any interaction history (such as opening emails).	Legitimate interest (with opt-out)

Our cookies and similar technologies

When you visit our website or a Risesmart app, we collect some information related to your device, your browser and to the way you navigate our content. We may use cookies to collect this personal data.

Cookies are small text files that are saved on your device when you visit our website or app. Cookies and similar technologies (like tokens) enable the website and app to remember your actions and preferences (for example, your choice of language) and recognize you when you return, so that we may analyze trends, determine your areas of interest and administer our website and app in order to speed up the navigation process and to make your site experience more efficient.

Please find more information on the cookies we use, for what purpose and further settings for configuring or deleting cookies in our cookie notice which you can find in the footer of our website.

AI technologies

our use of innovative AI technologies for Risesmart services

Our ultimate goal is to support people and organizations in realizing their true potential. We believe that the best way to achieve that goal is by combining our passion for people with the power of today's AI technologies. By AI technologies we mean technologies that help us digitize and enhance a variety of our processes. For example, we use AI to provide you with easy summaries of our career-related content, or to support you in practicing interviews.

As part of the broader recruitment process, AI technologies enable us to connect candidates with our consultants more quickly. This in turn allows our consultants to better support candidates in exploring job vacancies and to deliver the right candidates to our clients

faster. AI technologies also enable our consultants to find people based not only on the roles they qualify for, but also on the roles they are interested in.

responsible use of AI technologies

Randstad is committed to the ethical and responsible use of innovative AI technologies (you can read our AI principles [here](#)). Randstad does not use these technologies as a substitute for humans or human interaction in any part of its processes. Instead, our use of AI technologies is intended to make interactions with clients and participants more personal, relevant and meaningful.

How long we keep your personal data

As a general rule, we will not keep your personal data for longer than necessary. When your personal data is no longer necessary for the purpose for which it was being processed, we will delete or otherwise deidentify or mask it.

We keep personal data once you have completed your program and for as long as you continue logging in to our website or mobile app. If you haven't logged in for two years and that you don't respond to our invitation to log back in, we will delete or otherwise mask personal data associated with your profile and your program (like your identification details, assessment results, CVs or resumes, etc).

For Coaching, Outplacement, Internal Mobility, Reintegration ("Reintegratie"), and Baanbrekend, we store your data for at least 2 years after you have completed your program. As long as you continue to log in to our website or app, or remain in contact with us after these 2 years, your data will continue to be retained in our system for periods of 2 years at a time.

For Participation ("Participatie"), the following retention periods apply:

Participation ("Participatie")	2 years after the end of employment: all data and documents are moved to the archive (see retention period protocol). 5 years after the end of employment: Payroll Tax Statement (LBV) and ID document are deleted. 7 years after the end of employment (end of calendar year): employee file is permanently deleted. Employee who has worked: As long as the employee worker performs activities in their account (e.g., applies for a job or adds a CV), the candidate file containing mediation to work data remains active. Administrative (employee) data (placement, employment contract, payslips, annual statements, model agreements, etc.) must be deleted 7 years after the end of employment at the end of the calendar year. Exception: Pre-Employment Screening (PES) data (Certificate of Good Conduct/VOG, Self-Declaration of Integrity) and other PES data (if not collected as part of standard selection) are permanently deleted two years after the end of employment.
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We will also keep your personal data longer if necessary in connection with any actual or potential dispute (e.g. we need this personal data to establish or defend legal claims), in which case we will keep your personal data until the end of such dispute; and/or for us to comply with any legal or regulatory obligation (e.g. for tax purposes), in which case we will keep your personal data for as long as required by that obligation.

with whom we share your personal data

We may share your personal data with:

Randstad Group Entities:

- with other entities of the Randstad group of companies. We are part of a multinational group of companies and sometimes we may share personal data with other Randstad groups of companies for the purposes of efficient management of business, compliance with legal and regulatory requirements and to provide our Services to you and to our clients. For an overview of these entities, click [here](#).

Our "[partner for talent](#)" strategy focuses on building long-term relationships with clients and talents, understanding their unique challenges, and delivering tailored solutions to help them thrive in a dynamic global talent market. We leverage data, technology, and our deep industry expertise to connect the right talent with the right opportunities.

External partners for service delivery:

- with Randstad clients. Within the scope of our Services.
- with Risesmart coaches. Some of our coaches support our Services on an independent or freelance basis.
- with third party providers of IT-related services (e.g. we use an external provider to support our IT-infrastructure; e.g. an important part of our software and databases sit in a cloud-environment which is operated by a third party service provider).
- with providers of professional services (e.g. to our auditors, our tax advisors, our legal advisors).
- With third parties providing marketing-related services (for example: we may store your personal data in a cloud-based CRM application hosted and provided by a third-party service provider; for instance, when we engage a third-party service provider to organize an event, we may share your personal data with that third party to invite you to the event).
- With specialized external parties engaged by us who support us in the administration and execution of our Eigen Risico Dragerschap (ERD).

Public and Regulatory Authorities:

- with public authorities (e.g. pursuant to applicable law we may need to disclose personal data to tax authorities).
- with law enforcement authorities, courts and regulatory authorities (e.g. as part of a criminal investigation police services may require us to disclose personal data to them).

We may also disclose your personal data to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or

- if all or a substantial part of our assets are acquired by a third party, in which case the personal data that we hold about you may be one of the transferred assets.

When we share your personal data as described above, such personal data may be transferred both within and outside the European Economic Area (EEA).

In the event that we transfer your personal data internationally, we will only do so in line with applicable law, and we will require that there is an adequate level of protection for your personal data, and that appropriate security measures are in place.

Your personal data may be transferred from countries located within the EEA to countries located outside of the EEA (such as the United States). In such cases, we will require that the following safeguards are observed:

- The laws of the country to which your personal data is transferred ensure an adequate level of data protection. Click [here](#) for the list of non-EEA countries that, according to the European Commission, provide an adequate level of data protection; or
- The transfer is subject to standard data protection clauses approved by the European Commission. More information about those data protection clauses is available [here](#); or
- Any other applicable appropriate safeguards under article 46 of the EU General Data Protection Regulation (2016/679).

For more information about the safeguards that we have implemented to protect your personal data internationally, please contact us at privacy@randstadgroep.nl.

how we will protect your personal data

We have technical and organizational security measures in place to protect your personal data from being accidentally lost, used, altered, destructed, disclosed or accessed in an unauthorized way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your personal data are governed by Randstad's rules for information and IT security, data protection and other internal regulations and guidelines applicable to the processing of personal data.

While we have measures in place to protect your personal data, it is important for you to understand that 100% complete security cannot be guaranteed. Accordingly, we have procedures in place to deal with data security incidents and to comply with legal requirements applicable to the detection, handling and notification of personal data breaches.

your data protection rights

While your specific data protection rights will depend on applicable data protection law, they may include the following:

Rights	What does this mean?
1. Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we are providing you with the information in this notice.

2. Right of access	You have the right to access the personal data we keep about you – this is because we want you to be aware of the personal data we have about you and to enable you to verify whether we process your personal data in accordance with applicable data protection laws and regulations.
3. Right to rectification	If your personal data is inaccurate or incomplete, you have the right to request the rectification of your personal data.
4. Right to erasure	This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your personal data where there is no compelling reason for us to keep it. This is not a general right to erasure, there are exceptions.
5. Right to restrict processing	You have rights to ‘block’ or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further. We keep lists of people who have asked for further use of their personal data to be ‘blocked’ to make sure the restriction is respected in future.
6. Right to data portability	You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such personal data transferred directly to a third party.
7. Right to object to processing	You have the right to object to certain types of processing, in certain circumstances. In particular, the right to object to the processing of your personal data based on our legitimate interests or on public interest grounds; the right to object to processing for direct marketing purposes (including profiling); the right to object to the use of your personal data for scientific or historical research purposes or statistical purposes in certain circumstances.
8. Right to withdraw consent	If our processing of your personal data is based specifically on your consent, you have the right to withdraw that consent at any time.

You can exercise your rights by completing this form: [privacyverzoeken](#)

We may ask you for proof of identity to ensure that we are not sharing your personal data with anyone else but yourself.

Please be aware that, in particular cases (for instance, due to legal requirements) we may not be able to make your request effective.

You have the right to lodge a complaint with a supervisory data protection authority: <https://klachten.autoriteitpersoonsgegevens.nl/>

changes to this privacy notice

We may update this notice from time to time. You can see the date on which the last change was made below in this notice. We advise you to review this notice on a regular basis so that you are aware of any changes. Any substantive changes will be communicated to you.

contact us

If you have any questions about this notice or any privacy concerns, please contact us at privacy@randstadgroep.nl

The document is drawn up in English and in Dutch language versions. In case of any inconsistencies the Dutch language version shall prevail.

This notice was updated on: 27 August 2026