


Privacy Statement

Traxion B.V. / Traxion N.V.



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1. Introduction

Traxion manages your data in a conscious and careful manner. Traxion considers it very important to protect your privacy about the personal data that is recorded. This Privacy Statement indicates which Personal data Traxion records based on the associated purpose limitation and principles. In addition, Traxion clarifies to whom this data is provided. This Privacy Statement applies to all services of Traxion. You should be aware that Traxion is not responsible for the privacy policies of other sites and resources.

- All personal data are processed in accordance with the General Data Protection Regulation (GDPR) and in a proper and careful manner.
- Traxion has taken measures that are appropriate in view of the purposes for which personal data are processed, accurate and sufficient.
- Traxion applies the recognized “*Fair Information Principles*” consisting of 10 principles:
 - **Properly and carefully:**
The controller makes himself known: provides insight into the purpose of the data processing; indicates with whom the data is shared and informs the person concerned about his rights.
 - **Legitimate:**
The processing of personal data must take place in accordance with applicable laws and regulations.
 - **Purpose limitation and compatibility:**
Imposes restrictions on the processing of personal data. The processing must fit within the purpose(s) for which the data was collected.
 - **Data minimization:**
Limited collection of personal data is needed to achieve the goal.
 - **Correctness:**
Ensuring that personal data is and remains accurate (correct / up to date) from the moment of collection.
 - **Storage limitation:**
Destroying irrelevant or unnecessary personal data (pseudonymization, anonymization, destroy) after achieving the goals.
 - **Integrity and Confidentiality:**
Taking technical and organizational measures that ensure the security of data processing and that it is protected, among other things, against unauthorized or unlawful processing.

If you have any questions or wish to contact Traxion, you may use the contact information below.

Traxion B.V.
Attn. Privacy Office
Koeweistraat 4d
4181 CD Waardenburg
The Netherlands

Traxion N.V. Belgium
Attn. Privacy Office
Kardinaal Mercierplein 2
2800 Mechelen
Belgium

Phone: +31 418 653 883
Email: privacy@traxion.com

2. Type of information being processed

Traxion processes the following (personal) data, distinguished based on business relations, website visitors (www.traxion.com) and interns, external hiring, and employees.

In addition, Traxion, as part of SITS Group, uses Greenhouse for the application process. A 'Recruitment Privacy Statement' has been prepared for this purpose and is available via the Recruitment website (www.workattraxion.com).

2.1 Personal data from contact persons of business relations

Traxion processes personal data from business relations, such as customers or suppliers. This concerns the following information:

Personal data that Traxion processes from contacts (www.traxion.com)			
Which data does Traxion process?	Why?	Legal grounds	Retention period
<ul style="list-style-type: none"> • First name, prefix, Last name; • Company name; • Function; • Phone number or Cell phone number; • E-mail address; • Quote information. 	Correspondence, service delivery and job placement.	<ul style="list-style-type: none"> • To represent our legitimate interest; • To execute the agreement; • Compliance with legal obligations. 	Maximum 2 years after termination of the agreement; Or Financial accountability at least 7 years.
<ul style="list-style-type: none"> • Opt-in data: e-mail address, datum status (Registered or unregistered). 	Receiving emails, such as events, newsletters.	Consent.	4 weeks after opt-out.

1: Information processed from contacts

2.2 Personal data from employees

Traxion processes various data to perform its duties as an employer. So Traxion has Name, address and city data, bank data and operating data needed to conduct its legitimate interest.

Personal data of employees, interns, and external hiring			
What data does Traxion process?	Why?	Legal grounds	Retention period
<ul style="list-style-type: none"> • Contract; • Certificate of conduct or other screenings, including results; • Other forms and agreements. 	At work at Traxion or client.	Implementing the agreement.	At least 5 years after employment.

<ul style="list-style-type: none"> • First Name, Prefix, Last Name; • Gender; • Date of birth; • Address; • Citizen service number; • Date of entry into service; • Leave; • Working hours and hours worked; • Copy debit card and effective date bank details; • Cell phone number or phone number; • Email address; • Payroll tax statements, such as payroll tax discount, pay slips, annual statements, and expenses. 	<p>Identification and personnel, salary, and tax administration.</p>	<ul style="list-style-type: none"> • To protect our legitimate interest; • To execute the agreement; • Compliance with legal obligations. 	<p>At least 7 years after employment.</p>
<ul style="list-style-type: none"> • Data on holidays, leave, disability, pregnancy, and retirement; • Data on sickness, absenteeism, and benefit situation. 	<p>Personnel and absenteeism administration.</p>	<ul style="list-style-type: none"> • To protect our legitimate interest; • To execute the agreement. 	<p>Up to 2 years after employment.</p>
<ul style="list-style-type: none"> • Complaints; • Alerts; • Reports of assessment or performance interviews; • Personal working notes of human resource /recruiting. 	<p>Personnel records (staff file build-up).</p>	<p>Implementing the agreement.</p>	<p>Up to 2 years after employment.</p>
<ul style="list-style-type: none"> • Opt-in information: email address, status date (registered or unregistered). 	<p>Receiving emails, such as events, newsletters.</p>	<p>Consent.</p>	<p>4 weeks after opt-out.</p>
<ul style="list-style-type: none"> • Sign-in date, last login date, date last change. 	<p>Account management.</p>	<p>Implementing the agreement.</p>	<p>Up to 2 years after employment.</p>

2: Information processed from employees

2.3 Legality of processing (Legal grounds)

The processing of personal data by Traxion is only lawful if a legal ground for the processing has been defined. Below are the legal grounds that are applicable to the above mentioned processing (*Information processed from contacts, applicants and employees*):

- **To implement the agreement.**
This concerns the employment or contractual agreement concluded with Traxion. It is then necessary to process certain personal data of you to make it possible to provide a service or to work at Traxion.
- **Consent.**
You give permission for the processing of certain personal data. You can revoke this permission at any time.
- **To represent our legitimate interest.**
The processing is necessary to defend our legitimate interest. For example, Traxion must be able to prove that the data you have provided us has been audited.
- **Compliance with legal obligations.**
For example, as an employer, we are obliged to store a copy of the identification documents of employees.

2.4 Purpose of data processing

Traxion applies the “*Fair information principles*”, thereby only processing data for which a lawful purpose has been established. Below are the processing purposes applicable to the above-mentioned processing (*Information processed from contacts and employees*):

- A certificate of conduct (Verklaring Omtrent Gedrag, VOG) for the screening process within Traxion (if necessary);
- Concluding an agreement and being able to implement it;
- To be able to stimulate personal development by offering training, training, and tests;
- Send information by email about Traxion’s services, contract and terms and conditions.

If your data is processed based on a different purpose, you will be informed.

3. Rights and data protection

3.1 Rights of data subjects

Under the General Data Protection Regulation, customers, employees, and applicants have the right to view, correct, supplement, restrict, delete, and receive their data in such a way that the data can be easily transferred to another organization. You therefore have the opportunity to stand up for yourself if your personal data is processed.

3.1.1 Right of inspection

This means that you may ask Traxion if we have recorded your personal data and, if so, which one. We will then provide you with a copy of personal data.

3.1.2 Right to rectification/change

This means that you have the right to make changes regarding incorrect personal data. Based on the purposes of the processing, you have the right to complete this data if personal data are incomplete.

3.1.3 Right to data erasing

This means that data may be deleted when one of the following may apply:

- The personal data is no longer necessary for the purposes for which they were collected;
- Consent is withdrawn for the processing of personal data.

3.1.4 Right to restrict processing

This means that you can ask Traxion to stop processing your personal data provided that one of the following cases applies:

- If you suspect that Traxion has improperly used your personal data. Traxion must then check whether the data is complete and accurate;
- If Traxion processes certain data unlawfully and you do not want this data to be erased;
- The data is no longer needed for the purpose for which Traxion has collected it. However, you do need this information for a legal action.

3.1.5 Right to transferability of data

This means that personal data is transferred to You in a structured, common, and machine-readable form.

- Based on consent or based on a contractual agreement;
- Processing via automated processes is;
- The data from coming from, this means that data provided from Traxion is not subject to transferability.

3.1.6 Right to objection

This means that you may object to the processing of your personal data if there is a legitimate reason for this. This may be the case when your personal data is used to conduct direct marketing.

3.1.7 Right to submit a complaint

If you disagree with the way Traxion manages your personal data, you have the right to complain to the Dutch Data Protection Authority. The Dutch Data Protection Authority is the Dutch supervisor of compliance with privacy laws.

3.2 Protection of personal data

Traxion believes it is important that your personal data is well protected. Traxion is ISO27001 certified and has taken appropriate technical and organizational measures to limit misuse of and unauthorized access to personal data. This ensures that our workspaces, systems, programs, and information are securely arranged to standards, reducing the likelihood of unauthorized access.

In particular, we take the following measures:

- We use secure connections (TLS – Transport Layer Security) that protect all information between you and our website when you enter personal data;
- We keep logs of all claims of personal data.

In addition, Traxion does not publish any data of you without first explicitly requesting permission.

3.3 Provision to third parties and websites

Your data is expressly not provided to third parties.

This privacy statement does not apply to third-party websites connected to this website through links. Our site social media buttons are included. With this, the administrators of these services collect your personal data. Traxion cannot guarantee that these third parties will manage your personal data in a reliable or secure manner. Traxion therefore recommends that you read the privacy statement of these websites before using these websites.

3.4 Google Analytics

Traxion uses Google Analytics to track how visitors use our website. Traxion has concluded a processing agreement with Google to make arrangements about how your data will be handled. Furthermore, Traxion has not allowed Google to use the obtained Analytics information for other Google services. Finally, Traxion has anonymized the IP addresses.

3.5 Changes to this privacy statement

Traxion reserves the right to amend this privacy statement. It is advisable to consult this privacy statement regularly so that you are aware of these changes.

4. Cookies and automatically generated information

Traxion wants to inform you as fully and openly as possible about cookies used on www.traxion.com and www.workattraxion.com (Limited to the Recruitment Privacy Statement). Traxion uses cookies to improve the user's ease of use of the website and display content. Traxion will keep you informed about the developments regarding cookies.

4.1 What are cookies?

Cookies are small pieces of (text) information that a server sends to the browser with the intention that the browser will send this information back on a subsequent visit. Traxion cookies cannot damage your computer or files. Traxion only places cookies that are necessary for the performance of the services. If other cookies need to be placed, Traxion will ask your prior consent. Most browsers are set to accept cookies by default, but you can reset the browser to reject all cookies or to indicate when a cookie is sent. However, some features and services, on our and other websites, may not function correctly if cookies are disabled in your browser.

4.2 Automatically generated information

Our websites use cookies to help the website analyse how users use the website. This information consists of your IP address, the type of browser, the computer system you use, account number, the pages you visit on Traxion. The information obtained is then used to make the website work properly (tracking logged-in users, session information, etc.) Traxion does not place cookies for the benefit of other parties, such as ad networks.

4.3 Block cookies

If you block cookies on www.traxion.com or www.workattraxion.com via, for example, cookie blocker software, you can still visit this website. However, you may not be able to use all the components and functionalities.