

# Privacy Statement on HVC's Access Policy

In this Privacy Statement we would like to inform you about which personal data HVC collects and uses as part of its Access Policy and how HVC deals with it.<sup>1</sup> HVC is an organisation active in the field of sustainable waste management and renewable energy. These activities are carried out by various legal entities that are part of the HVC Groep. The processing of personal data takes place at various HVC locations. This can be an office space and/or a location where waste is processed or collected, such as a waste-to-energy plant or a waste disposal station. The Access Policy of HVC may differ per location. For the purposes of this Privacy Statement, 'HVC' means all legal entities that are part of the HVC Groep.

We recommend that you read this Statement carefully.

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<sup>1</sup> This Statement *doesn't* describe which personal data HVC collects from its *internal* employees. Are you an internal employee of HVC? Then consult the internal HVC documentation on privacy.

# 1 How does HVC handle your privacy?

In order to protect the health and safety of staff and visitors, HVC applies an Access Policy at its locations and offices. In doing so, HVC complies with the applicable laws and regulations, such as the privacy law and legislation.

HVC attaches great importance to privacy and therefore handles your personal data with care. That means, for example, that we:

- use this privacy statement to **state the purposes** for which we process your personal data;
- have **security measures** in place to protect your personal data;
- respect your rights, such as the right to **access** and **correct your personal data** on request;

## Contact details HVC

Telephone: +31 (0)72 5411311 (Front office Alkmaar) / +31 (0)78 6216800 (Front office Dordrecht)

Email [frontofficefzalkmaar@hvcgroep.nl](mailto:frontofficefzalkmaar@hvcgroep.nl) (Front office Alkmaar)  
[frontofficefzdordrecht@hvcgroep.nl](mailto:frontofficefzdordrecht@hvcgroep.nl) (Front office Dordrecht)

Post: N.V. HVC  
attn. Front office  
Postbus 9199  
1800 GD Alkmaar, The Netherlands

# 2 Use of personal data

In order to guarantee the safety of its employees and visitors as much as possible, it is necessary for HVC to know who is located within its locations. That's why we may ask you to identify yourself and we use camera surveillance. You thereby provide us with your personal data. The method of identification may differ per location. For example, those who carry out work in an installation such as the composting plant or a waste-to-energy plant are required to identify themselves differently from a visitor to a waste disposal station.

In this Privacy Statement we indicate which personal data we may use and how we process it. This will not always be all the information below. That depends on the capacity in which you visit HVC, for what purpose you visit HVC, and which location of HVC you visit.

# 3 Processing of personal data in context of the Access Policy

**Access to offices and installations**

Both visitors and (internal and external) employees are required to be able to identify themselves with a legal means of identification, such as an ID card or passport.

HVC uses an *access registration system* at a number of its locations. Access takes place at those locations via an access tag or access pass provided to you by HVC.

Please note: Organisations and/or visitors who come to take a tour of Alkmaar or Dordrecht do not receive their own entrance pass. However, they must register with HVC (via <https://www.hvcgroep.nl/over-hvc/aanmelden-rondleidingen> or by email) prior to their visit. The details of these visitors are kept on a separate registration list.

***External employees who are going to carry out work on installations***

If you come as an external employee, for example as a self-employed worker, hired personnel (or temporary employee) and personnel who come from another company to work at HVC, perform work on HVC's installations or if you come to carry out related work on HVC's site, additional conditions will apply for safety reasons to obtain access. For example, you must be in possession of a valid SCC certificate ('VCA certificate').

For the locations Alkmaar and Dordrecht, HVC uses a *safety portal* (the web application [www.werktveilig.nl](http://www.werktveilig.nl)). All external employees who will be working on HVC's installations at these locations must be registered via this portal. Through this portal you can enter your data, you must declare that you are in possession of a valid SCC certificate, and you must watch HVC's safety film and pass the corresponding test successfully. The certificate that you receive for this is valid for 2 years. In order to gain access to these HVC locations, HVC must approve your application as submitted through this safety portal.

A final step before you, as an external employee, can receive your access pass is to check your means of identification (passport, proof of identity or residence permit). HVC makes use of special software at the Alkmaar and Dordrecht locations for this purpose. This software has been developed in such a way that it checks whether your passport or identity card is genuine and valid, without your citizen service number (BSN) being read. The data read in will be used to print your personal access pass. With this system, no copy of your passport, identity card or access pass will be kept by HVC.

**Access to waste disposal stations**

Visitors to a waste disposal station are required to be able to identify themselves. Whether and how a visitor is required to identify themselves may depend on the agreements that HVC has made with the municipality concerned in this respect. If you would like to know which agreements apply specifically to your regional waste disposal station with regard to identification, please contact our Front Office (see the heading [Contact](#)).

The access to a waste disposal station can be done by showing a:

**1. waste pass**

Visitors to waste disposal stations equipped with access control will gain access to the site by using the municipal waste pass. The waste pass presented is checked by checking the relevant waste pass number against a list of accepted waste pass numbers (White list). This check is carried out digitally.

HVC in any case applies access control by means of a waste pass at its waste disposal stations in Beverwijk, Emmeloord, Hendrik Ido Ambacht, Lelystad, Velsen and Zeewolde.

2. *proof of identity*

At waste disposal stations that do not have access control, the visitor may be asked (randomly) by the employee of the station for their postcode or – in case of doubt – requested to provide proof of identity. The identification is used to determine whether the visitor lives in the region in which the waste disposal station is located.

**CCTV surveillance**

HVC uses camera surveillance at its locations. This is announced by means of a sticker or information board, and takes place in the car park, at the weighbridge, at the reception and in the buildings where there are installations.

**Lockers**

HVC has a locker system at its office locations in Alkmaar and Dordrecht. People with an access pass can use the lockers by means of the pass.

**Personal data**

For the purposes of the Access Policy, the following personal data can be processed by HVC:

*Visitors:*

- first and last name
- home connection (waste disposal station)
- type of identity document, document number and period of validity
- email address
- phone number
- external characteristics (camera surveillance)
- registration number (license plate) (camera surveillance)
- logging data
- waste pass number (waste disposal station)
- unique identification code Releezme App (lockers) (if the app is installed by the user themselves)
- locker usage data (lockers)

*External staff:*

- company contact details (contact person name, contact person email address)
- first and last name
- date of birth
- type of identity document, document number and period of validity
- country of issue of identity document
- phone number
- email address
- presence of a valid SCC certificate
- access pass number
- address and place of residence data
- national personal identification number (only in case of possible chain liability)
- nationality (only in case of possible chain liability)

- the name and address details of the seconding organisation and the seconding organisation's registration number at the Chamber of Commerce
- logging data
- external characteristics (camera surveillance)
- registration number (camera surveillance)
- unique identification code Releezme App (lockers) (if the app is installed by the user themselves)
- locker usage data (lockers)

*Additional personal data of foreign external personnel who are going to perform work on HVC's installations:*

- copy or scan of the identity document / work permit for non-EU nationals (only in the case of employees from outside the EEA and Switzerland)
- presence of an A1 certificate, residence permit, including number and period of validity (only in case of possible chain liability)

### **Basis for processing**

HVC has a legitimate interest in the processing of your personal data, namely the creation of a safe work environment and the fulfilment of good employment practices.

HVC also has a number of legal obligations for the processing of personal data, such as:

- Section 658, Book 7, of the Dutch Civil Code, on the employer's liability towards its employees (borrowed or otherwise)
- Dutch Collection of State Taxes Act 1990 (Invorderingswet 1990), the Dutch Collection Guidelines (Leidraad Invordering) and other underlying decrees and the Implementing Regulations to the Mandatory Use of Citizen Service Numbers (Uitvoeringsregeling verplicht gebruik BSN), on the use of Citizen Service Numbers (BSN) in connection with the prevention of chain liability
- the Dutch Working Conditions Act (Arbeidsomstandighedenwet) and the Working Conditions Decree (Arbobesluit)
- the Foreign Nationals Employment Act (Wet arbeid vreemdelingen: Wav)
- General municipal by-law (Algemene plaatselijke verordening), or the Municipal waste bye-laws

### **Purposes of the processing**

HVC processes your personal data for the following purposes:

- protection of the health and safety of internal staff, external staff and visitors, including in the event of calamities
- carrying out accident inquiries (incidents) or investigations following exposure (possible or otherwise) to hazardous substances
- security of buildings and objects in and around HVC's buildings
- providing information about healthy & safe working conditions
- checking the possession of a valid SCC certificate
- implementing the duty to provide proof of identity
- age verification: working on the HVC installations is only permitted for employees aged 18 years or older
- the prevention of subcontractors' or chain liability ('ketenaansprakelijkheid')

- the prevention of recipients' liability ('inlenersaansprakelijkheid')
- facilitating the use of lockers
- monitoring compliance with legal or safety obligations (internal or otherwise)
- compliance with legal obligations and court orders
- litigating disputes

## 4 Third parties

HVC may use the services of third parties for the aforementioned purposes and it may therefore be necessary for your personal data to be provided to those third parties. Consider, for example, parties who manufacture or maintain the access control systems. These third parties may only process this data for the aforementioned purposes. Your personal data will not be provided by HVC to third parties for commercial, good or non-commercial causes. We may be required to provide your personal data to third parties if we are required to do so by law. For example, the police or the Social Affairs and Employment Inspectorate (SZW) could request information from us (with a court order).

## 5 Retention periods

Your personal data will be kept for as long as it is necessary for the aforementioned purposes. Your personal data will not be kept for longer than 7 years after the last processing, as long as no other legal retention periods apply.

For time records data, HVC shall in principle use a storage period of 6 months after the right of access has expired, unless another legal storage period applies, such as the obligation to retain data for fiscal purposes. For example, the personal data of workers exposed to hazardous substances are subject to a retention period of 40 years from the end of exposure to hazardous substances.

HVC uses a retention period of 5 years after the end of the calendar year in which the agreement with the employee in question is terminated for the copy or scan of the identity document or passport.

For CCTV footage, HVC uses a storage period of a maximum of 4 weeks, unless there is an incident. The images will then be kept until the incident has been completely dealt with.

## 6 Security

HVC takes the security of your personal data very seriously. HVC has an appropriate information security policy in place to, among other things, prevent unauthorised persons from gaining access to your personal data. This policy shall be reviewed periodically and adjusted if necessary.

## 7 Your rights

You have the right to request HVC to access your personal data, insofar as HVC processes it. After receiving your request, you will receive an overview of this personal data within 1 month. If this reveals any inaccuracies, you may request that your data be amended, supplemented, erased or screened off. You can also request HVC to transfer your personal data ('data portability') or you can object to the processing of your personal data due to special personal circumstances.

## 8 Contact

Questions about this Privacy Statement or a request about the processing of your personal data can be sent by post to:

***N.V. HVC***

*Stating: Processing of personal data*

*Postbus 9199*

*1800 GD ALKMAAR, THE NETHERLANDS*

You can send requests about the processing of your personal data by email to:

[frontofficefzalkmaar@hvcgroep.nl](mailto:frontofficefzalkmaar@hvcgroep.nl) (Alkmaar Front Office) or

[frontofficefzdordrecht@hvcgroep.nl](mailto:frontofficefzdordrecht@hvcgroep.nl) (Dordrecht Front Office)

In order to prevent abuse of these rights, we ask you, when submitting your request, to identify yourself by sending a copy of a valid proof of identity. Don't forget to make your Citizen Service Number (BSN) and your passport photo unreadable on the copy. For example, you can use the '[KopieID](#)' app for this purpose.

## 9 Complaints about the processing of your personal data

If you have a complaint about the processing of your personal data by HVC, please let us know. If we do not reach a solution together, you have the right to submit a complaint to the privacy supervisor, the Dutch Data Protection Authority (Dutch DPA). You can also apply to the competent court in your region. More information can be found on the website of the Dutch DPA and at [www.rechtspraak.nl](http://www.rechtspraak.nl).



## **10 Changes to the Privacy Statement**

HVC may amend this Privacy Statement. New versions are always published on the website. HVC encourages you to periodically review this Privacy Statement to be informed of any changes.

Date of last change: 9 July 2019