



# Bitvavo Applicant Privacy Notice

*Last updated: 09/03/2022*

In this document we explain what kind of personal data we collect via our application tool Greenhouse (Greenhouse Software Incorporated, 18 West 18th Street, New York, New York 10011, USA). For information regarding our other processes, please read our main [Privacy Notice](#).

## 1.1 Who is responsible for the processing of your personal data?

Bitvavo B.V. (hereinafter: “Bitvavo” or “we”) is responsible for the processing of your personal data and acts as ‘data controller’ under the GDPR. If you have questions about the processing of your personal data, you can always contact us through the contact details listed at the bottom of this document.

## 1.2 What personal data do we process?

### Information you provide to us

We process personal data that we receive from you within the job application process if you apply for a job on our website or via LinkedIn. We may process the following personal data from you:

- Your personal details (e.g. name, address, contact details including email address and telephone number, date and place of birth, nationality);
- Background information (e.g. educational background, certificates, employment history);
- Working permit information (e.g. valid working permits, European Citizenship possession);
- Any other information in your application that you choose to share with us – such as personal preferences, photos, hobbies, social preferences, links to your portfolio or social media platforms etc.

### Information we receive indirectly

We may receive your name, contact details or CV from one of our employees, external recruiters or others, as a referral, for the purpose of identifying possible suitable roles for you. In such cases, we will personally inform you by email. You can always opt out for this procedure. We may also review LinkedIn profiles of candidates that apply for a role at Bitvavo.

## 1.3 Why and on what basis do we process your data?

Bitvavo processes your personal data for the purpose of talent acquisition, based on our legitimate interest (article 6(1)(f) GDPR) to recruit suitable new candidates. If you provide us with your consent (article 6(1)(a) GDPR), we may also retain your personal data for an additional year, for the purpose of possible future vacancies that might suit your profile.

## 1.4 How long do we retain your personal data?



We process your personal data for a maximum of four weeks after the application process is finished, or, with your prior consent, for an additional year, for the purpose of possible future vacancies that might suit your profile.

### **1.5 Does Bitvavo make use of automated decision-making?**

Bitvavo does not make use of automated decision-making without human intervention. All applications will be reviewed manually by our talent acquisition department.

### **1.6 Who may receive your personal data?**

Your personal data may be accessible to the provider of our application tool, for the purpose of hosting and maintenance. This party qualifies as a data processor and we have entered into a data processor agreement with them.

#### **1.6.1 Does Bitvavo transfer personal data to recipients outside the European Economic Area?**

We have ensured your personal data is stored (at rest) in a database that is hosted within the European Union. However, some data might be transferred to servers in the United States of America in order to perform essential business functions, such as technical support. In the absence of an adequacy decision from the European Commission, we have adopted Standard Contractual Clauses to our data processor agreement with our provider and implemented supplementary measures to reduce the privacy risks.

### **1.7 Your rights**

If your personal data is processed, you have privacy rights and, of course, Bitvavo respects these. More specifically, you have the right of access, deletion and rectification of personal data, objection to processing of personal data, restriction of processing of personal data and the right of data portability. You can exercise your right by contacting [privacy@bitvavo.com](mailto:privacy@bitvavo.com). We may ask you to provide further information in order to determine your identity first, to ensure that no one else is trying to execute your privacy rights.

Bitvavo will respond to your request as quickly as possible, although this can take up to one month. If more time is required to complete your request, Bitvavo will let you know how much longer is needed and the reasons for the delay.

The above rights are not always absolute, and sometimes we may have pressing interests or a legal obligation to deny your request. In such case, we will explain to you our reason for denying your request.

### **1.8 Complaints**

If you believe that Bitvavo has processed your personal data unlawfully or if you are not satisfied with Bitvavo's response to your request, you can send your complaint to [privacy@bitvavo.com](mailto:privacy@bitvavo.com). Bitvavo will



respond to your complaint as quickly as possible. You may also directly contact our Data Protection Officer via [dpo@bitvavo.com](mailto:dpo@bitvavo.com).

You are always entitled to file a complaint with a data protection supervisory authority if you believe that we are not processing your personal data in accordance with the GDPR. In the Netherlands, the supervisory authority for data protection is: Autoriteit Persoonsgegevens - Website: <https://www.autoriteitpersoonsgegevens.nl>

### **1.9 How Bitvavo will protect your personal data?**

Bitvavo has implemented appropriate technical and organizational measures to ensure your personal data and privacy is safe, among which measures of pseudonymization and encryption of personal data. We have ensured our processors and any sub-processors have also implemented appropriate measures, by entering into a data processor agreement with them.

### **1.10 Updating the Privacy Notice**

Bitvavo may update this document. If the change concerns a fundamental change to the nature of the processing or if the change may be relevant to and impact upon you, Bitvavo will inform you of changes, explicitly and effectively, well in advance of the change actually taking effect.

### **1.11 Contact and questions about this Privacy Notice?**

If you have any questions or recommendations, please send an email to [privacy@bitvavo.com](mailto:privacy@bitvavo.com) or contact Bitvavo's Data Protection Officer directly at [dpo@bitvavo.com](mailto:dpo@bitvavo.com). Bitvavo will respond to your request as quickly as possible.