

Candidate Privacy Notice

1. Who we are

This Candidate Privacy Notice explains how 42NL B.V., a private company with limited liability (besloten vennootschap), incorporated under the laws of the Netherlands, having its corporate seat in Amsterdam and its registered office at Barbara Strozilaan 201, 1083 HN Amsterdam, the Netherlands (“42NL B.V.”, “42”, “we”, “us” or “our”), processes personal data of individuals who apply for a job with us via our website or otherwise contact us in relation to a vacancy.

42NL B.V. is the controller of this processing for the purposes of the General Data Protection Regulation (**GDPR**).

If you have any questions about this notice or about how we handle your personal data, please contact us at **info@42.com**.

2. Scope of this notice

This notice applies to personal data processed in connection with applications for employment or other roles with 42NL B.V.

It does not apply to personal data processed after a candidate is hired. In that case, personal data will be processed in accordance with the applicable employee or contractor privacy notice.

3. Personal data we process

We may process the following personal data to the extent relevant to the recruitment process:

- identification and contact details, such as your name, email address, telephone number and country of residence;
- application information, such as your CV/resumé, cover letter, work history, education, qualifications, skills and availability;
- correspondence with you regarding your application;
- interview notes and internal assessments relating to your suitability for the relevant role;
- where relevant and lawful, reference information provided by referees identified by you;
- where relevant, information and documents required to verify your identity and your right to work, such as passport or identity card details, residence permit details, work permit details, visa or immigration status, and supporting right-to-work documentation;
- limited technical data relating to your use of our website and application form, such as IP address, browser type and submission time, for security and system administration purposes.

We receive most of this personal data directly from you.

Please do not include special categories of personal data in your application unless this is strictly necessary.

4. Why we process your personal data and legal bases

We process your personal data for the following purposes:

Recruitment and assessment

To receive and review your application, assess your suitability for the relevant role, communicate with you, organise interviews and related recruitment steps, and, where relevant, involve appropriate affiliated group personnel, advisers or consultants in candidate assessment, hiring decisions, operational support or related recruitment administration.

Legal basis:

- processing is necessary in order to take steps at your request prior to entering into a contract (Article 6(1)(b) GDPR); and/or
- processing is necessary for the purposes of our legitimate interests in recruiting suitable candidates (Article 6(1)(f) GDPR).

Identity, immigration and right-to-work checks

Where relevant, to verify your identity and confirm that you are permitted to work in the Netherlands and/or in the relevant role, including by reviewing identification and immigration-related documents where required under applicable law. Dutch employers must verify identity and eligibility to work, and keep a copy of the identity document in their records for employees.

Legal basis:

- compliance with a legal obligation (Article 6(1)(c) GDPR); and/or
- processing is necessary in order to take steps prior to entering into a contract (Article 6(1)(b) GDPR).

Compliance and legal protection

To comply with applicable legal obligations and, where necessary, to establish, exercise or defend legal claims.

Legal basis:

- compliance with a legal obligation (Article 6(1)(c) GDPR);
- legitimate interests in protecting our legal position and the integrity and security of our systems and processes (Article 6(1)(f) GDPR).

We do not use candidate data for marketing purposes and we do not keep a separate long-term talent pool under this notice.

5. Retention period

If your application is not successful, we will retain your personal data for no longer than 4 weeks after the end of the recruitment process for the relevant vacancy, unless a longer retention period is required by law or is necessary for the establishment, exercise or defence of legal claims.

If your application is successful, relevant personal data may be included in your personnel file and retained in accordance with the applicable employee privacy notice and retention rules. Under Dutch rules, employers must retain the copy of an employee's identity document for 5 years after the end of the calendar year in which the employment ends.

After the applicable retention period, we will delete or anonymise your personal data.

6. Who may receive your personal data

We may share your personal data on a need-to-know basis with:

- relevant employees and managers of 42NL B.V. involved in the recruitment process;
- where relevant for the recruitment process, certain affiliated group companies and their personnel, as well as advisers or consultants assisting with candidate assessment, hiring decisions, operational support or related recruitment administration;
- service providers supporting our website, IT systems, hosting, communications or recruitment administration, acting on our instructions and subject to appropriate confidentiality and data protection obligations;
- recruitment agencies involved in your application, where applicable;
- competent authorities, courts or professional advisers where required by law or necessary in connection with legal proceedings.

We do not sell your personal data.

Where personal data is accessed from or transferred to recipients outside the European Economic Area, we will ensure that such access or transfer is carried out in accordance with the GDPR and subject to appropriate safeguards where required.

7. Your rights

Subject to the conditions and limitations under the GDPR, you may have the right to:

- request access to your personal data;
- request correction of inaccurate personal data;
- request deletion of your personal data;
- request restriction of processing;
- object to processing based on our legitimate interests;
- request data portability, where applicable.

To exercise your rights, please contact us at info@42.com.

You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

8. Security

We take appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, misuse or unlawful disclosure.

9. Changes to this notice

We may update this Candidate Privacy Notice from time to time. The most recent version will be made available on our website.

Last updated: April 2026