



---

# PROTOCOL SCREENING JDE

---

## Introduction

Screening means that JDE requests information concerning a job applicant or associate in order to assess his integrity. For example by calling a job applicant's references, requesting a Certificate of Good Conduct (in Dutch Verklaring Omtrent Gedrag (VOG)) or by checking whether this person is blacklisted.

This protocol provides how JDE handles screening. This concerns both specific screening requests from customers and pre-employment screening carried out by JDE itself.

There are therefore 2 types of screening:

1. Pre-employment
2. Customer-specific during employment

The approach per type and the related preconditions are set out below.

## Pre-employment

A potential new associate is requested to cooperate in pre-employment screening during the recruitment process. The vacancy texts also state that the pre-employment screening forms part of the application procedure.

There are various screening profiles; a specific profile is applied depending on the integrity-sensitivity of the job. Only those data are collected that are essential to establishing whether the future associate can harm the security and/or integrity of JDE and the customer.

1. Standard profile. This profile applies to all jobs and includes the following aspects:
  - ID – Verification whether the document has been reported as stolen or missing (Visa Information System (VIS register));
  - Diplomas and training - Verification takes place via the Education Executive Agency (in Dutch Dienst Uitvoering Onderwijs (DUO)). Secondly, the training institute is checked and the last step is verification of the diploma of the person involved. Foreign diplomas and training are verified via Nuffic, which involves feedback concerning both the training itself and the diploma (obtained).
  - Work experience – By default the last 3 years are verified. This takes place via references or via the HR department of the previous employer. Verification of work experience has the characteristics of an employer's declaration; the following questions are asked: Is the employer correct? Is the period correct? Is the job correct?
2. Comprehensive profile. This profile applies to jobs with an increased integrity risk. Depending on the type of risk, screening for example takes place with respect to:
  - Certificate of Good Conduct (in Dutch Verklaring Omtrent Gedrag (VOG));
  - Online integrity: results from search engines, internet forums and public social media;
  - Financial integrity: Determination of possible ongoing payment issues, companies registered in the name/at the address of the person concerned, civil court judgments (including bankruptcy) and guardianship register.

If it is concluded from the pre-employment screening that there is a reasonable doubt regarding the integrity of the future associate, employment will not take place.

## Customer-specific

Certain customers demand that screening is carried out. These customers have such risks that they have a legitimate interest in screening. This includes the police, court or airport for example. The actual scope and content of the screenings depend on the location. For example, it will be more extensive in case of an airport than of a court. The associate is notified in advance about the actual content of the screening.

Only data that are relevant to the purpose may be used. Reports to the police and convictions relating to acts or practices that are not relevant should therefore not be taken into account, and such data are not processed or stored.

In general the screening focuses on the associate in question (by means of a Certificate of Good Conduct (VOG)), and not his family or environment. In the exceptional case screening has to be carried out that extends beyond the associate (such as General Intelligence and Security Service screening (in Dutch AIVD)), it will first be discussed with the concerning customer to assess if the screening is useful and necessary.

JDE will check all requests from customers to determine whether the interest is actually legitimate and if there possibly is another way that is less drastic for the person in question.

The screening set out above is coordinated by a specific JDE department - which is not necessarily the HR department - in line with the applicable privacy rules and by one or more officers who have signed an additional non-disclosure agreement (NDA) for this purpose. In case of negative advice, JDE will be informed that it cannot and will not grant the associate in question access to its customer. No details are shared with JDE concerning the reason(s) for the negative advice. The associate concerned will be assigned to other customers.

## Processing personal data

All relevant data collected during the screening, are processed in accordance with the General Data Protection Regulation (GDPR) and are used exclusively for the purpose for which the data is intended. Namely: the assessment if the associate concerned could harm the security and integrity of JDE and/or its customers.

In case of customer-specific screening, JDE prepares the screening application (VOG application) for the associate via a digital platform. The associate approves it and receives the results following the screening. The associate provides the screening results to JDE via a special and secure e-mail address. This e-mail address and further handling of the application are managed by one officer at the Planning department, with whom a non-disclosure agreement has been agreed.

JDE provides the screening results to the customer in case of a positive outcome. The customer is requested to register the associate as accepted and to remove the screening results immediately. JDE may save the screening results confidentially – respecting the statutory retention period - for any future screening requests.

The customer ensures that the information obtained from the screening is handled in strict confidence.

## Final provisions

JDE, the customer that requests specific screening, as well as the associate involved, are obliged to comply with this protocol.

JDE and the Works Council (WC) may change and/or adjust the protocol in mutual consultation:

- in case legislation or social developments give cause for doing so;
- in case of unforeseen circumstances and in case of a direct and major interest on the part of JDE.

Adjustments or changes are discussed and adopted in writing by JDE and the Works Council (WC). Both parties sign the changed version before it is submitted to the customer and the associates concerned.

*Version May 2019*