

Data and Document Retention Schedule for Randstad Enterprise - Business Intelligence & Analytics

1. Purpose

This retention schedule applies to the Business Intelligence & Analytics Department of Randstad Enterprise (“RE-BI”). It sets out the retention requirements applicable to all data and records collected, generated, or otherwise processed by RE-BI. In addition, it sets out RE-BI’s policy regarding the same.

The Randstad Enterprise BI & Analytics department is the owner of this data and document retention schedule. Where necessary, it will review this schedule and, for the purpose of such review, will liaise with Randstad Enterprise’s legal department and the Randstad Enterprise Data Protection Officer.

Compliance with the retention periods and associated deletion of data and records as defined in this schedule, lies with the respective owner of such data and/or record.

2. Data and record retention principles

RE-BI processes data (personal and non-personal) on behalf of Randstad Enterprise clients. In doing so, the Randstad Enterprise client acts as the controller under applicable data protection law. Randstad Enterprise acts as the processor to the client for the delivery of its Services, including any reporting built on the instruction of its client. Any such reporting is built on data (personal and non-personal) for which the client is responsible as the controller. Hence, the ultimate responsibility over data retention periods applicable to such data lies with the client.

RE-BI will not retain data (personal or non-personal) for longer than necessary to deliver reporting per client instruction. This retention schedule defines *default* retention periods which the RE-BI applies to data it receives from the client. These default retention periods will apply where the client acknowledges them and in doing so, instructs RE-BI to retain the data for such period. These retention periods take into account SLAs and KPIs that form the basis on which Randstad Enterprise provides reporting to the client.

Where a client instructs different retention periods to be implemented, any such instruction will have precedence over this retention schedule. Nonetheless, these instructions will be accepted on the basis that they do not interfere with the SLAs and KPIs that form the basis on which Randstad Enterprise provides reporting to the client.

The schedule will also define retention periods applicable to RE-BI operational documentation. Given that these do not involve the collection, use, and overall processing of client data

(personal or non-personal) for Randstad Enterprise's reporting to the client, the RE-BI team is the sole owner of this documentation and the associated retention periods.

The default retention periods are defined in addendum A to this schedule.

3. Data and record deletion principles

Any data (personal or non-personal) or records of which the retention period has expired, must be securely deleted per the procedure defined in addendum B to this schedule. Only hard delete actions will be deemed as compliant under this schedule.

Addendum A: data and document retention schedule

Client reporting data			
Data category	Data points	Classification	Retention period
<i>Non-personal data points</i>			
job	job title, job grade, function, reason, approval, open and start date,...	confidential	contract duration
company	company name, location, business unit, cost center, ...	confidential	contract duration
Process flow	status and dates: longlist, shortlist, background check, interviews, offer, hired	confidential	contract duration
KPI & SLA	time to submit, time to offer, time to hire, open positions,	confidential	contract duration
sourcing	sourcing channel, agency,...	confidential	contract duration
Candidate/worker	assignment, tenure, labor type,...	confidential	contract duration
billing	invoice, spend, currency, expenses, bill rate, pay rate, billing and invoice dates, buyer code, savings, ...	confidential	contract duration
<i>Personal data points</i>			
candidate	name, location, email address	Personal data	5 years (as from the year in which data was generated) or contract duration, whichever is shortest
hiring manager	name, location, email address	Personal data	5 years (as from the year in which data was generated) or contract duration, whichever is shortest
recruiter	name, location, email address	Personal data	5 years (as from the year in which data was generated) or contract duration, whichever is shortest
candidate diversity	race, ethnicity, gender, disability, veteran status	Personal data	5 years (as from the year in which data was generated) or contract duration, whichever is shortest

Randstad internal data

Data category	Data points	Classification	Retention period
<i>Non-personal data points</i>			
billing	invoice, spend, currency, expenses, bill rate, pay rate, billing and invoice dates, buyer code, savings, ...	confidential	7 years (as from the year in which data was generated)

Operational RE-BI documentation

Document, Client/Vendor related	Classification	Responsible	Retention period
System Architecture overview & specs	Confidential	BI Architecture	1 year from the end of the contract
Analytics & analysis support documentation	Internal Use	BI Analytics	1 year from the end of the contract
Personnel credentials for access management	Confidential	BI Governance	date of contract termination
Data processing related policy papers	Confidential	BI Analytics	1 year from the end of the contract
Architecture & data governance policy papers	Confidential	BI Governance	1 year from the end of the contract
Audit & certification documentation	Confidential	BI Governance	3 years from the end of the contract

Addendum B: data and document storage and deletion procedure

