



Privacy Statement for Employees

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Introduction

Protection of your privacy is important to NN. We take our responsibility for protecting your personal data very seriously and have therefore drafted this Privacy Statement for Employees. The purpose of this Privacy Statement is to create transparency about the way NN collects, processes and protects your personal data. It also sets out how we comply with data protection laws like the Generic Data Protection Regulation ("GDPR"). Please read this Statement carefully in order to understand how we deal with your personal data.

This Privacy Statement may be changed when new developments require this. For this reason, we advise you to consult this Privacy Statement from time to time. This Privacy Statement was last changed on 31 July 2018.

1. Scope of this privacy statement

This Privacy Statement for Employees applies to NN Group N.V., NN Insurance Eurasia N.V. and its related personnel companies NN Insurance Personeel B.V., NNIP Personeel B.V. and Delta Lloyd Services B.V. ("NN").

This Privacy Statement pertains to the processing of all personal data of NN employees or individuals who have a comparable labour relation with NN, including former employees, trainees, current and former temporary workers working for NN under a third-party contract, current and former members of the Management Board, Executive Board and Supervisory Board or a similar administrative body of NN ("employees"). Our Privacy Statement for Applicants can be found at <https://nn-careers.com/privacy-statement>.

2. Who is responsible for your personal data within NN?

NN (located at Schenkade 65, 2595 AS The Hague) is responsible for processing your personal data.

In some cases we share your personal data with other parties [more information can be found in paragraph 4]. If these companies may have a shared responsibility for all or part of your personal data, we ensure that these companies also comply with pertinent privacy laws.

For generic questions or remarks about this Privacy Statement please contact our HR Services via NNServiceDesk.hr@nn-group.com. When and where necessary, they will contact the Data Protection Officer of NN Group N.V. and ensure your questions receive a correct reply.

3. For what purposes do we process your personal data?

3.1 To enable you to do your job and us to run our business

3.1.1 What does this purpose mean?

As part of your and our day-to-day work, we process several kinds of personal data in order to manage our business in an efficient way. Sending emails to our colleagues, setting up work schedules, planning tasks, organising meetings, using business applications, and management and support of our IT systems are some examples.

3.1.2 What personal data do we process for this purpose?

For this purpose, we use personal data like your name, contact details (email address, location, phone number), identification data (Logon ID, Corporate Key) and if applicable the photo you provided.

3.1.3 Which individuals at NN can access these personal data?

NN employees working for HR, IT, Corporate Security & Investigations and Corporate Audit Services departments, and senior management have access to your personal data. Your direct manager can also access your data.

NN employees have access to (some of) your personal data only when this is required to do their job.

Moreover, you have access to your own personal data as well. You can find more information about this in paragraph 8.

3.1.4 How long will we retain your personal data for this purpose?

The retention period differs per type of personal data. We will in no case retain these personal data for longer than eight years after termination of your employment agreement or, in the event that retaining your personnel file is necessary, as long as this necessity exists. You can find more information about Data Retention at [HR2read] under Various documents.

3.1.5 What is the legal ground for processing these personal data?

The legal ground for processing your personal data is the legitimate interest of NN in running its business efficiently (article 6 paragraph 1 sub f GDPR).

3.2 For your personal development

3.2.1 What does this purpose mean?

Scope for your personal development is important to NN and we will gladly support you with this. It is also important for NN to keep track of your individual professional achievements. One of the ways we do this is by setting up a personal development plan together with you to specify competencies, expectations and tasks. Afterwards, we can evaluate your progress on the goals that were set. Together with you, we might for example offer you internal training and courses. NN will not make automated decisions based on your individual achievements.

3.2.2 What personal data do we process for this purpose?

For this purpose we process personal data like your name, contact details (email address (work and private), address and phone number), identification data (personnel ID), education and work experience, individual achievements and competencies.

Additionally, NN sometimes monitors telephone conversations of support desk operators. The information collected from these conversations is used for training purposes only. If information is collected in this way, you will be notified beforehand. We will also inform you about the timeframe during which the calls will be monitored.

3.2.3 Which individuals at NN can access these personal data?

NN employees working for HR, IT, Corporate Security & Investigations and Corporate Audit Services departments, and senior management have access to your personal data. Your direct manager can also access your data.

These individuals only have access to (parts of) your personal data when this is required to do their job.

Moreover, you have access to your own personal data as well. You can find more information about this in paragraph [8].

3.2.4 How long will we retain your personal data for this purpose?

The retention period differs per type of personal data. We will in no case retain these personal data longer than we are required to by law. You can find more information about Data Retention at [HR2read] under Various documents.

3.2.5 What is the legal ground for processing these personal data?

The legal ground for processing your personal data is the legitimate interest of NN to assess individual performance relating to personal development and annual evaluations (article 6 paragraph 1 sub f GDPR).

3.3 For generic HR-related matters, including payroll administration

3.3.1 What does this purpose mean?

When you sign an employment agreement with NN (or any other agreement under which you perform tasks for NN), we need your personal data. This information enables us to perform standard HR tasks, like drafting your employment agreement, handling job applications, taking care of the payroll administration and executing pension agreements.

3.3.2 What personal data do we process for this purpose?

We use your name, contact details (email address, phone number, address), identifiers (personnel ID, national ID (BSN)) a copy of your passport and your absence file. We also process financial data, including the number of your bank account. If you are a member of a trade union, we use this information only to refund your first year's membership fee.

3.3.3 Which individuals at NN can access these personal data?

NN employees working for HR, IT, Corporate Security & Investigations and Corporate Audit Services departments, and those working for the Pensions department, have access to your personal data. Your direct manager can also access your data.

These individuals only have access to (parts of) your personal data when this is required to do their job.

Moreover, you have access to your own personal data as well. You can find more information about this in paragraph 8.

3.3.4 How long will we retain your personal data for this purpose?

We keep this data for as long as we are required to do so by law. We will in no case retain these personal data for longer than eight years after termination of your employment agreement. You can find more information about Data Retention at [HR2read] under Various documents.

3.3.5 What is the legal ground for processing these personal data?

The legal ground for processing these personal data is the performance of a contract (article 6 paragraph 1 sub b GDPR).

3.4 For the administration of absenteeism

3.4.1 What does this purpose mean?

Absence because of sickness is reported to the Health & Safety department. By keeping track of absenteeism we can provide ill employees with support and may (when necessary) adjust the way we work or take preventive measures. This can help NN control absenteeism and help you to get back to work.

3.4.2 What personal data do we process for this purpose?

For this process, we use your name, contact details (email addresses, phone numbers, address) and identifiers (personnel ID, national ID number (BSN)). In some cases, the Health & Safety department may need more detailed information, for instance about your re-integration. A problem analysis and an action plan are then used as input. A company doctor may process medical information.

3.4.3 Which individuals at NN can access these personal data?

Due to the sensitive nature of personal data regarding your absence, access is limited to a small group of individuals that need this information to comply with legal requirements. Management is notified of your absence and has a role in making an action plan for re-integration where relevant. Only the company doctor and staff members working under supervision of the company doctor have access to medical records.

3.4.4 How long will we retain your personal data for this purpose?

Medical records are kept for a maximum of 15 years. You can find more information about Data Retention at [HR2read] under Various documents.

3.4.5 What is the legal ground for processing these personal data?

The legal ground for processing these personal data is compliance with a legal obligation, for example the “Wet Verbetering Poortwachter” (article 6 paragraph 1 sub c GDPR).

3.5 To monitor and investigate compliance within NN

3.5.1 What does this purpose mean?

NN has multiple legal obligations such as prevention of fraud and money laundering, or detecting possible data breaches. Furthermore, we have in place a Code of Conduct for NN Group, which sets out our main values. Your personal data may be used to monitor compliance with our legal obligations and our Code of Conduct.

If your personal data is used for this purpose, you will be informed beforehand. We will inform you what data will be recorded, over what period and for what purpose. In the event of violation (or alleged violation) of the Code of Conduct and subject to specific orders of the management, your data may be used without you being informed. This is only allowed if there is no other way to ascertain a possible violation. We always comply with the [Investigation Standard](#).

3.5.2 What personal data do we process for this purpose?

We use personal data like your name, contact data (email address, phone number), identifiers (personnel ID), Certificate of Good Behaviour, professional references of previous employers and financial transactions relating to insiders. Patterns in usage of phone, email or networks may be part of the monitoring process. We like to emphasise that the contents of emails and/or phone conversations are not monitored unless we have concrete suspicions of fraud or misuse. For more information please read the [NN Information Security Standard](#).

3.5.3 Which individuals at NN can access these personal data?

NN employees working for HR, IT, Corporate Security & Investigations, and Corporate Audit Services departments, IT, Compliance and NN Group Management have access to these data only insofar as their job requires this.

3.5.4 How long will we retain your personal data for this purpose?

We do not keep these data any longer than required by law. CCTV images will normally be deleted 24 hours after recording. You can find more information about Data Retention at [HR2read] under Various documents.

3.5.5 What is the legal ground for processing these personal data?

The legal ground for processing these personal data is the legitimate interest of NN to monitor internal compliance (article 6 paragraph 1 sub f GDPR).

3.6 To guarantee your and our safety and integrity

3.6.1 What does this purpose mean?

To guarantee your and NN's safety and integrity, all individuals entering our buildings are monitored and visitors are registered. In the event of incidents, we know who is inside the building and if necessary we can contact you or your contact person. Log files may contain your personal data. We use these files to record several kinds of security details, including entry card logs, conference calls or laptop usage.

We monitor patterns in NN phone usage to evaluate whether the capacity of our telephone infrastructure suffices.

3.6.2 What personal data do we process for this purpose?

We use personal data like your name, contact details (contacts in case of emergency, email addresses, phone numbers, address), identifiers (personnel ID, Logon ID, Corporate Key) and information about your location. CCTV cameras may record your presence in or around the building. In all cases, we treat this information with due care.

3.6.3 Which individuals at NN can access these personal data?

For this purpose, the Security Operations Centre ("SOC") processes your data. Employees working for Corporate Audit Services, Corporate Security & Investigations, IT, Facility Management or NN Group Management may have access if and when their job requires this.

3.6.4 How long will we retain your personal data for this purpose?

The retention period differs per category of personal data. We will in no case store these data longer than required by law. You can find more information about Data Retention at [HR2read] under Various documents.

3.6.5 What is the legal ground for processing these personal data?

The legal ground for processing these personal data is the legitimate interest of NN to guarantee the safety and integrity of its employees, buildings and infrastructure (article 6 paragraph 1 sub f GDPR).

3.7 To comply with legal obligations

3.7.1 What does this purpose mean?

NN is sometimes required by law to provide government agencies with personal data of our employees. For example, the Dutch tax authorities require us to provide certain financial data relating to our payroll administration. The "Wet Verbetering Poortwachter" requires us to share information about absenteeism with the Institute for Employee Benefit Schemes (UWV). Furthermore, we may be required to cooperate with police inquiries and provide relevant information. Regulations regarding the integrity of the financial industry require every employee to sign an oath or promise. NN keeps these in order to prove compliance with this legal obligation.

3.7.2 What personal data do we process for this purpose?

This depends on the legal obligation. In most cases we use your name, contact details, address, information about absenteeism and financial data.

3.7.3 Which individuals at NN can access these personal data?

This differs for each legal obligation.

3.7.4 How long will we retain your personal data for this purpose?

The retention period differs per category of personal data. We will in no case retain these personal data for longer than eight years after termination of your employment agreement. You can find more information about Data Retention at [HR2read] under Various documents.

3.7.5 What is the legal ground for processing these personal data?

The legal ground for processing these personal data is compliance with a legal obligation (article 6 paragraph 1 sub c GDPR).

4. Who can access your data?

4.1 Access to your data within NN

Your personal data are accessible only for individuals working for NN as far as this is required for performing their job and only in order to serve the purposes described in paragraph 3.

Which specific individuals have access to your personal data within NN differs per personal data category. You can read this in paragraph 0.

4.2 Third parties with access to your personal data

NN is required by law to share specific personal data with government agencies such as the Dutch tax authorities and Institute for Employee Benefit Schemes (UWV). Furthermore, NN may share personal data with:

- Providers of IT services. For maintenance, management and support of our systems and applications, they may need limited access to some of your personal data. This will never happen without prior consultation with NN.
- Companies for private transportation. They may receive your name, contact details, address, identifiers (like your personnel ID) and sometimes gender and date of birth if you use their services.
- Mortgage and other banks used for payment of salaries and settling mortgage discounts. NN may provide your name and contact details, financial data (including your bank account number) and identifiers.
- Pension administrators. We provide them with your name and contact details, data about your partner, national ID (BSN) and financial data.
- Organisations for work & health and coaching. After consultation with you, these companies receive your name and contact details, date of birth, gender, and - only when required by law – your national ID (BSN). Subject to your permission, NN may also provide these companies with data about your absenteeism.
- Advisors for mobility. With your consent, we provide them with your name, contact details and personnel ID.
- Insurance companies. When relevant they receive your name, contact details and financial data (including your bank account number).
- Institutions for learning and training. When you register for a training course, the training institute receives your name, contact details, date of birth and gender.

5. How do we protect your personal data?

Because your privacy is important to us, we treat your personal data with strict confidentiality. NN has also implemented appropriate technical and organisational measures to protect your data. These measures serve to ensure protection against unauthorised or unlawful access to, and/or disclosure, loss, destruction or alteration of personal data. To achieve this, NN uses several technical security measures including secure servers, firewalls and encryption, as well as physical security of server rooms.

In the Incident Management Standard and the accompanying guidelines, you can find the internal procedures for dealing with data breaches in relation to personal data under control of NN.

6. Will your data be shared outside the European Economic Area?

As NN operates in an international environment, your personal data may, in exceptional cases, be shared with NN entities outside the GDPR area. This may be the case if you work for an NN company outside the EU (on short or long term assignments).

Furthermore, NN uses IT service providers that may operate from or have servers outside the Netherlands. These companies may be able to access some personal data from outside the EEA, for instance from the United States. NN has taken extra measures to ensure your personal data is strictly protected by these foreign companies. NN has signed agreements with these companies specifically obliging them to protect your personal data at the level required by the GDPR.

7. Does NN use automated individual decision making or profiling?

No. NN does not use automated decision-making or profiling based on your personal data.

8. Where can you ask your questions and request for inspection, deletion or objection?

You are entitled to request access to your personal data processed by NN at any time and without any related costs. You can instruct us to correct or delete these personal data. Furthermore you may ask NN to limit processing of your personal data or to transfer your data to another company that controls and processes data. You can also object to the processing of your personal data by NN.

If you added information to your NN profile, you can always access, change or delete this data yourself. You can find your profile in Workday.

8.1 To whom can you send your request?

Employees can enter their request in the Self Service Portal HR. Former employees can send a written request to the HR Services department via NNServiceDesk.hr@nn-group.com.

8.2 Where can you object?

If you are not satisfied with the answers provided by HR Services, you can object to our Values & Code Desk [via: values_code@nn-group.com]. You are also entitled to send your complaint to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

8.3 What information should you provide with your request?

Your request should state as clearly as possible which personal data the request refers to. We will try to handle your request as soon as possible and in any case within the legally required timeframe. For any request, NN is required to confirm the identity of the requestor.

We may not be able to meet your request, for example in cases where NN needs to process your personal data for the purposes listed in paragraph 3. We will therefore assess together with you the correctness and completeness of your personal data and whether these data are required for the intended purposes.