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# Privacy Statement for Members, Directors, and Contractors

Once you have been selected to work for DLL, we will collect and process your personal data during and after your employment with us. This Privacy Statement outlines how we collect and use your personal data and meet our data protection obligations.

For questions related to this Statement or the processing of personal data in general, please contact us via: [usprivacyoffice@dllgroup.com](mailto:usprivacyoffice@dllgroup.com)

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## 1 Who does this privacy statement apply to?



This privacy statement is for DLL employees (who are referred to as 'members'), supervisory directors, contractors, consultants, temporary staff members, interns, and secondees.

This privacy statement applies to you if:

- you are a member;
- you are a (supervisory) director;
- you are an (external) contractor, consultant, temporary staff member, intern, or secondee (collectively, "Staff").

This privacy statement does NOT apply to job applicants or customers. If you are a job applicant or customer, please see the applicable Privacy Statement covering how we manage your personal information for that relationship.

If you are a California resident, please see our **California Consumer Privacy Act Disclosure and Notice at Collection for Residents of California**.

## 2 Who is responsible for the processing of your Personal Data?



DLL U.S. Holdings Company, Inc., together with each of its subsidiaries that collect and process Personal Information on members, ("DLL", "we", "us", or "our") is accountable and responsible for the transparent and lawful processing of your personal data.

Our contact information is:

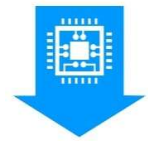
DLL U.S. Holdings Company, Inc.  
1111 Old Eagle School Road, Wayne, PA 19087  
[Usprivacyoffice@dllgroup.com](mailto:Usprivacyoffice@dllgroup.com)  
+1 (800) 873-2474

We are a wholly owned subsidiary of De Lage Landen International B.V., which is a wholly owned subsidiary of Coöperatieve Rabobank U.A. ("Rabobank" and together with its subsidiaries, the "Rabobank Group"). Entities within the Rabobank Group are deemed affiliates of DLL.

A Data Protection Officer ("DPO") has been appointed for De Lage Landen International B.V. and its subsidiaries ("DLL Group"). The DLL Group DPO can be contacted by email via [privacyoffice@dllgroup.com](mailto:privacyoffice@dllgroup.com). For any questions or requests related to this privacy statement, please contact us by email via [usprivacyoffice@dllgroup.com](mailto:usprivacyoffice@dllgroup.com).

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## 3 What Personal Data do we process?



During and after your employment with DLL, we will process your Personal Information, which will include your personal details (such as name, gender, birth date, government-issued identification numbers, etc.), employment and educational history, financial information (such as salary, bank account number, etc.), and your HR record (such as contract details, appraisals, absences etc.)

“Personal Information” or “Personal Data” is any information directly or indirectly relating to an individual or household, or any information that can be used to identify an individual or household. These terms will be used interchangeably throughout this privacy statement.

Personal Information is “processed” when any activity is undertaken on your personal data, such as collection, storage, access, use, transfer, disclosure, and deletion.

Throughout your employment with DLL, and occasionally following the end of your employment, we may process certain Personal Data, including but not limited to those listed below, as applicable to your role(s) at DLL.

### Personal details

Name(s), preferred name(s), gender, place of birth, nationality, ethnicity, date of birth/age, marital status, photographs, passport copy, national ID, Social Security number, other government issued number(s) (such as tax identification number(s), work visa number(s), driver's license number(s), etc.), image of driver's license(s), and signatures, authentication data (passwords, challenge/response questions, and answers), person ID, and personal phone number.

### Family details

Name(s) and contact details of partner(s), children, or other family members.

### Employment details

Screening document, emergency contact, job title, office location, business activities, names of current and former employers, hourly rate, work address, work telephone number, work or private email address and work-related social media profile details, outside business activities, number of working hours, headcount, full time equivalent, and number of working days.

### Education history

Details of your educational background and professional qualifications, including degrees, diplomas, employment history, resumes, CVs, language skills, etc.

### Financial details

Salary, billing address, bank account numbers, credit card numbers, cardholder or account holder name and details, instruction records, transaction details, payroll data and counterparty details, tax data, wage tax statement, retirement account information, and financial information related to your benefits.

### Performance management data

Rating, personnel evaluations, performance management assessments, promotions, and bonus/merit increase information.

### Electronic identifying data

IP addresses, cookies, activity logs, online identifiers, unique device identifiers, and geolocation data.

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#### Leave data

Balance, initial balance, carry over, start, and end date of request, details about unpaid (including maternity/paternity/parental), special leave, sabbatical leave and end dates of contracts.

#### Vehicle and Driving Information

Information about company leased cars, fuel cards, tracking systems to register business mileage, and personal vehicle information when parked in a DLL parking lot.

#### Screening data

Result of the yearly in-employment screening and result of the pre-employment screening.

#### Company assets

In use and returned company assets and all data stored in such company assets.

#### Exceptions register

If an exception to a DLL policy (e.g., employee handbook) was approved, the content of the exception is registered.

#### Closed-circuit television (CCTV') and Meetings Video Recordings

Your image in video recordings in CCTV and/or in meetings.

#### Reporting

Cost center and HFM code, HR Center, and functional domain.

#### Recordings of telephone conversations with customers for improving quality of our services

Recording (details), name, telephone number, and conversation details.

#### Biometric Information

Such as fingerprints, voice prints, or photos.

#### Information Required to fulfill legal obligations

Child support obligations, worker's compensation, unemployment, garnishment details and other similar information.

#### Other

Signed source documents of requested changes to data, business email correspondence, and photographs, video, or audio tapes, transcriptions, or other recordings for business purposes.

## 4

### Do we process special categories of Personal Data?

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If needed, we will process some “special categories” of Personal Data relating to you. As this information is more sensitive, we take extra care to determine whether such special categories of Personal Data are necessary for our processing.

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We may collect special categories of Personal Data, or information about characteristics of protected classes as defined under federal or state law, which are considered more sensitive, such as information relating to your racial or ethnic origin, background check information, health data, sexual orientation, marital status, military status, citizenship, gender, and religion or

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philosophy of life. We process these special categories of Personal Data for the applicable purposes and as allowed by law, as further described below.

#### **Race or ethnic background**

We may process aggregated gender, ethnicity and nationality data for inclusive monitoring purposes.

#### **Personal data concerning background checks**

As a regulated financial services provider, we are required to perform background check screenings of Staff prior to and during their employment. We consult (directly or via third parties) with financial industry incident databases and fraud alert systems to ensure the highest integrity of our members to protect our interests and the interests of our business, members, and customers.

#### **Health**

Types of health-related data that we might collect include hours of sick leave, doctors' reports and/or interventions of third parties, parental leave, and emergency contact details. In general, a member or such member's health care provider will be responsible for registering the health or medical data of members, not DLL. However, when it is necessary to register that you are on sick leave, or in that event that DLL is obliged to make efforts for your reintegration into the workplace or to support you in your recovery, we will process information relating to that situation. Additionally, if you have health problems that require certain special accommodations in the workplace, this will also involve the processing of Personal Data concerning your health.

#### **Sexual orientation**

DLL may process Personal Data concerning your sexual orientation (including data concerning an employee's partner) to determine dependent eligibility for benefits.

#### **Religion or philosophy of life**

This data may be processed for the purposes of accommodating religious or philosophical practices, dietary wishes, or religious holidays.

From time to time, laws and regulations may require us to process additional categories of Personal Information.

## **5 When and why do we process your Personal Data?**



**We will use your Personal Data to maintain an employment relationship with you and will collect different Personal Data at various stages of our relationship with you.**

#### **When we enter or change an employment contract with you**

To enter into, update, amend or end a contract, we will need your Personal Information, such as current and former names, addresses, and other contact details together with identity verification documents and signatures obtained in the application process.

#### **When we undertake annual screening checks**

Some senior roles that hold positions of financial responsibility require annual screening checks to ensure propriety and integrity of our management team. If you hold such a position, an annual check will be undertaken to screen you against international sanctions databases.

#### **Payroll and salary reporting**

We will require your bank information and your government tax references to enable us to pay your salary, expenses and bonus / incentive payments and pay tax and/or other government charges on your behalf.

#### **Member feedback survey and equality monitoring**

We will ask for your feedback on your experiences as a Staff of DLL and whether you would promote DLL as a good place to work to others. We will also invite your feedback on issues such as DLL's leadership, working environment, ways of working and remuneration to better improve the way we manage member satisfaction. In most cases, survey responses are anonymous and optional.

#### **When you undertake mandatory training**

Some online and in person mandatory training will be provided to you each year during your employment with DLL. Mandatory training is essential training required for all members to undertake in compliance with varying local and global regulations that are intended to protect the integrity and security of the financial sector. All mandatory training, which may include test scores and/or certifications, will be recorded on your HR record.

#### **When you undertake non-mandatory training**

Some online and in person training may be provided to you for career development or operational improvement. Online training will be automatically recorded in our Learning Management System (LMS) and will form part of your HR record.

#### **To manage member sick leave and reintegration**

When you have a leave of absence due to sickness (that is over 3 days) your line manager will conduct and record a 'back to work' interview with you to ensure that your return to work is appropriate and to facilitate your return. We are required to record health-related absences to comply with applicable employment law.

#### **When you take leave**

We will record any leave that you take, as well as any supporting information required to administer your holiday or time off, and manage any other absence related to sickness, parental leave, volunteer leave, or other leave.

#### **To provide you with other benefits that form part of your contract for employment**

We may collect and share your data with benefits providers such as a retirement plan provider, a life insurance provider, health insurance provider, and related financial brokers.

#### **When your line manager evaluates your performance**

We will retain your touchpoint documentation and your annual performance review record on your HR file which will evidence your experience throughout your employment and will support decisions on salary and bonus reviews, performance management programs, and development opportunities.

#### **For our succession planning**

Your data in your HR record will be used to support succession planning either to promote you towards new roles, restructure teams, or ensure continuity in the event you leave your role.

#### **To provide you with other optional benefits that support your employment**

We may collect and share your data with benefits providers, such as wellbeing services.

#### **For sustainability and community involvement schemes**

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You may choose to register for a volunteering or fundraising activity as part of the sustainability program at DLL where members are encouraged to give back to their local community. Your involvement in such activities is managed via a registration portal.

**When you have a car lease, fuel card and/or car allowance**

We will share data with car lease companies where you are eligible and opt to lease a vehicle. We will process information about your car, such as the make, model, and registration number to provide you with a fuel card when applicable. We also undertake regular annual checks on your licensing and insurance arrangements to ensure compliance with our local policies.

**Investigations, grievances, and legal cases**

If you report a concern or raise a grievance or complaint, we will investigate the issue, which can include undertaking recorded interviews with all necessary parties and documenting reports and findings to provide a resolution.

**When you travel for business purposes and claim expenses**

If you need to travel for work purposes, we will provide you with an account with our travel agent where you will be able to book trains, flights, and hotels. Expenses you incur on a business trip will need to be claimed via our expense reimbursement portal with relevant receipts attached or, if you are eligible, you may request a company credit card.

**To secure our office and systems against unauthorized use and loss of data**

You will be provided with a security pass to access and move through our offices where CCTV is in operation for the purpose of securing our premises, assets, and information and protecting the safety of our Staff. We also use your data to register devices on our network and monitor our online systems to detect unlawful access or extraction of data and manage access into various systems containing sensitive, personal, or confidential information.

**For operational reasons such as business continuity and budget planning**

Employment data will also be used more broadly to manage our operating resources in the running and continuity of our business, such as in the areas of auditing, business continuity planning, insurance, financial forecasting, and budgeting.

We keep business continuity plans that can be instigated if an unexpected event or disaster occurs that impacts the operation of our business. We will use your personal contact details to alert you when business continuity plans must be employed.

**To facilitate international mobility**

If you move to another role or temporary assignment in another global location, we will process your Personal Data to facilitate the move. This may involve visa applications, insurance coverage, moving personal belongings, and transferring payroll.

**To manage mergers, acquisitions, and divestments**

If we acquire or merge with another business entity, or divest one of our business entities, we will process your Personal Data to transfer your employment or contract to the relevant entity.

**For health and safety monitoring and reporting**

If you have an accident or health and safety issue at work, we must log all details on a health and safety record as required by applicable laws. Relevant accident information will be recorded which may include health information.

**When we communicate with you**

We may use company channels, such as mail, email, phone, Teams, and our company intranet site, to communicate with you throughout your term of employment.



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**To provide you with IT equipment, manage our office resources and car parking**

We use applications to manage our office resources, enabling you to book desks and meeting rooms in our buildings. We also monitor the vehicles in our car parking facilities to ensure access and use is limited to our visitors and Staff.

**If you appear in our publications (internal and external)**

We may take a recording or photo of you to use on a brochure, website, or our social media accounts.

**If we are required to make a disclosure to a government body, supervisory authority or by order of a court or to defend our legal rights**

There may be occasions where we are required to share the Personal Data of our Staff where it is requested by a government or public authority in compliance with local regulations. If legal action is taken against us, we may need to process your data in the course of our legal defense.

**To improve our ways of working**

We record some of our telephone calls for training and monitoring purposes, typically in our customer-facing teams. This enables us to review a call in the event of a complaint or for quality assurance purposes. We may also record business meetings to facilitate wider distribution of the meeting content or for recordkeeping purposes.

**In a life-threatening situation**

If we have to call an ambulance or an emergency medical care provider and you are unable to provide consent, we will share your Personal Data with the emergency care providers.

**For managing and reporting on conflicts of interest, segregation of duties, anti-bribery, corruption, conduct, and ethics**

You will be asked to register any outside business activities and personal/business related conflicts of interest, such as received gifts, hospitality, and entertainment, and attest your compliance with our code of conduct on an annual basis to facilitate our regulatory reporting.

**Regulatory fit & proper assessments of (statutory) Board Members and Senior Officers**

If you are in a senior position, specific information about your integrity and suitability may be required to be sent to regulators.

## 6 How long do we store your Personal Data?



**Generally, we will store your Personal Data for as long as we need it for the purposes for which we have collected it.**

We have a retention policy which specifies how long we store data. We endeavor to retain each category of your Personal Information for no longer than what is reasonably necessary for business purposes according to our internal retention policy. We use the following criteria to determine the applicable retention period(s):

- whether there is a retention period required by applicable laws or regulations;
- pendency of any actual or threatened litigation for which we are required to preserve the information;
- pendency of applicable statutes of limitations for potential legal claims; and

- business needs or generally accepted best practices in our industry

We do not store your Personal Data longer than we need to for the purposes for which we have collected it. We have implemented appropriate technical and organizational measures to ensure that only people that have a right to access your information can access it. Typically, we will hold your employment record for a period of 7 years after your employment with us ends.

In certain cases, we may use different retention periods. For example, if a public or supervisory authority requires us to store certain Personal Data longer, if you have filed a complaint that makes it necessary to keep the underlying Personal Data for a longer period, or in specific cases for archiving, legal proceedings, or statistical purposes.

## 7 With whom will we share your Personal Data?



Where needed, we may share your Personal Data with:

- Other DLL entities globally or within the Rabobank Group
- Trusted third parties outside DLL or the Rabobank Group

### Sharing data within the DLL Group

DLL is an international company with offices in multiple countries. Due to the nature of our business, the location of our members, and human resources management systems, or the location of our shared services center(s), we may share Personal Data of our Staff internally with other DLL entities.

### Sharing data within the Rabobank Group

DLL is a wholly owned subsidiary of Coöperatieve Rabobank U.A., a Dutch Bank with a registered office in Amsterdam, the Netherlands ("Rabobank"). The "Rabobank Group" consists of Rabobank plus all its subsidiaries. There may be times when we share Personal Data with Rabobank or other Rabobank Group entities.

### Sharing data outside the Group

Like any other company, we rely on the services of third parties. When we engage specialist suppliers, consultants, or contractors to assist us in running our business, we may share your Personal Data with them where it is necessary for the service they provide to us. For instance, we may use a third party to assist us with our payroll.

When legally obligated to do so, we will share your Personal Data with government authorities, regulators, or supervisory authorities and law enforcement agencies.

## 8 How do we protect your Personal Data?



**We use various technical and organizational measures to protect your Personal Data against destruction, loss, unauthorized disclosure, and unlawful processing. Only Staff who need access will process your Personal Data. All our members are generally bound by a duty of confidentiality and our company's Code of Conduct.**

DLL is committed to taking the necessary organizational and technical measures to protect your Personal Data when we process it and share it with third parties. These include:

- All our members are generally subject to confidentiality obligations.
- We use appropriate security measures to ensure the confidentiality, integrity, and availability of your Personal Data, as well as certifying systems and services which are resilient and are able to restore data in the event of a data loss.
- We regularly evaluate the effectiveness of our technical and organizational measures to ensure continuous improvement in the security of processing Personal Data.
- We usually only process your Personal Data for the purposes for which these were originally collected. Personal data may also be processed for a legitimate business purpose different from the original purpose (secondary purpose), but only if the secondary purpose closely relates to the original purpose. For example, we will process your data to provide optional additional employee benefits to you such as 'cycle to work' schemes and wellbeing services.
- When we share your Personal Data with third parties outside of the Rabobank Group, we endeavor to perform due diligence and assessments of those parties and verify the secure processing of your Personal Data by way of contractual terms and conditions where feasible.

## 9 What choices and rights do you have regarding your Personal Data?



Individuals are granted certain rights concerning the processing of their Personal Data. These rights are:

- the right of access and rectification
- the right of erasure
- the right to restrict Personal Data processing
- the right to data portability
- the right to object to data processing, and
- the right to withdraw consent.

Global privacy laws differ when it comes to individual rights regarding Personal Data. DLL, however, offers all Staff the following rights concerning the processing of their Personal Data:

### Access and Rectification

You can ask us to access the Personal Data we hold about you. Where you believe that your Personal Data is incorrect or incomplete, you can ask us to correct or add more detail to your Personal Data, once verified.

### Erasure

You can ask us to erase your Personal Data processed by us. If we do not have any legal obligations or legitimate business reasons to retain your Personal Data, we will strive to fulfill your request where feasible and as permitted by applicable laws and regulations.

### Restriction

You can ask us to limit the Personal Data we hold about you. We may refuse this type of request if we have a lawful reason to continue holding your Personal Data (e.g., the exercise of a contract, a legal archiving duty, or the establishment, exercise, or defense of legal claims).

### Portability

You have the right to ask us to provide you with a copy of your Personal Data in a structured and machine-readable format or to transfer your Personal Data on your behalf to a third party. Transfer of Personal Data directly to a third party can only be done if it is technically possible.

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#### Objection

You have the right to object to the processing of your Personal Data. If you object to our processing of your information, we will stop the processing where feasible and there is no overriding legal, business or regulatory requirement. If an overriding requirement exists, we will inform you of this.

## 10 How can you contact us with a request, question, or complaint?



We would like to hear from you if you have any questions about this Privacy Statement, or if you wish to exercise any of your rights.

For questions related to this Privacy Statement, please contact our local privacy officer or local compliance officer via: [usprivacyoffice@dllgroup.com](mailto:usprivacyoffice@dllgroup.com).

If you would like to exercise any of your rights, please fill out the following form:

[Submit a Request or Complaint](#)

We will respond within the timeframe as required by privacy laws applicable to you. We may need to ask you for some additional details to clarify your request or provide verification of your identity.

We will do our best to handle your request, question, or complaint efficiently.

## 11 Will we update this privacy statement?

**Last updated on September 4, 2025**



This Privacy Statement will be updated from time to time in case of additional legal requirements or if we process Personal Data for new purposes.