

# PACCAR

## Data Protection

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## PACCAR EU Employee Privacy Statement

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## 1. Introduction

The protection of your personal data is important to us and this is why we have drafted this statement to inform you about how we treat your personal data.

In this statement, we tell you:

- What personal data we collect from you;
- For what purpose we use it;
- What lawful basis we have to use it;
- With what kind of parties we share it;
- How we protect your personal data, and,
- What rights you have regarding your personal data.

This privacy statement applies to all current, past employees of PACCAR work for a European PACCAR entity or are located within the European Union.

“PACCAR”, “we”, “us” and “our” in this statement refers to PACCAR Inc., PACCAR Holding B.V. and all its related entities. DAF Trucks N.V. is one of these related entities.

This statement was last updated on August 17, 2018 and will be reviewed and updated on a regular basis. Please make sure you check DAFweb for the most up to date version of this statement.

We have tried our best to make this statement as concrete and complete as possible. Please do not hesitate to contact our Data Protection Officer (DPO) in case you have any questions or concerns regarding this statement:

Phone number: +31 (0)40 2144885, mail: [dataprotectionofficer@daftrucks.com](mailto:dataprotectionofficer@daftrucks.com).

## 2. Who is responsible for your personal data?

PACCAR Inc. and its group companies are each a controller for the processing of your personal data. The main entity collecting your personal information will be the entity that is mentioned on your employment contract. In section 7 you can find contact information if you want to use any of your rights regarding the personal data we have collected from you.

## 3. What personal data do we use, on what basis and why?

In general, we collect your personal data for:

- Human resources and personnel management;
- To ensure your health, safety and security;
- For business process execution and internal management;
- For organizational analysis and development and management reporting;
- Compliance with legal obligations;
- Your vital interests.

Below follows an overview of the types of personal data we use from candidates, employees and former employees. Please note that this is a general overview applicable to all PACCAR employees, and that we will provide separate information when we use your personal data in a substantially different way than listed below.

As you can see below, you provide us with some information because of legal and contractual requirements. Please know that not providing the information mentioned there might affect your employment status within PACCAR since this information is necessary for the performance of your contract and for us to stay compliant with applicable laws. For other legal bases, you can find your rights mentioned in section 7 below.

### 3.1 Recruitment

Below is a table with the types of personal information we use when we recruit candidates to work at a PACCAR entity. We also explain why we use this personal data (the purpose) and what lawful basis we have to use this personal information.

Type of personal data	Purpose	Lawful basis
Resume, including education and employment history, date of birth, nationality, civil status	To assess your suitability for a job position	Legitimate interests of PACCAR, in order to recruit the appropriate personnel for its business
Contact information, such as your telephone number, e-mail address and home address	To contact you about the recruitment process	Legitimate interests of PACCAR, in order to recruit the appropriate personnel for its business
Correspondence with you	To be able to review our correspondence with you and for general administration purposes	Legitimate interests of PACCAR, in order to be able to prove its correspondence with candidates
Assessment information, such as the outcome of tests results and interviews	To assess your suitability for the job position	Legitimate interests of PACCAR, in order to recruit the appropriate personnel for its business
Pre-employment screenings, such as a certificate of good conduct or more extensive background checks	To assess your suitability for the job position in case the position requires certain assurance on your previous performance and/or behavior	Legitimate interests of PACCAR, in order to recruit the appropriate personnel for its business. Pre-employment screenings will always be treated confidentially

#### How long do we keep recruitment data?

When you have been hired to work for us, we keep the personal data mentioned above during your employment with us, to prove you were suitable for the position when you were hired, to monitor your further development within PACCAR and to be able to determine the appropriate compensation and benefits applicable to your professional experience and background.

### 3.2 Employees

Type of personal data	Purpose	Lawful basis Lawful basis
Contact information, such as your telephone number, e-mail address and home address	To be able to contact you for work-related matters and general administration purposes	Performance of the contract with you
Function information, such as your job position, availability details, working hours	To be able to identify your role and availability within the company	Legitimate interests of PACCAR, in order to perform personnel management
Bank account information, such as your bank account number	To be able to pay your salary	Performance of the contract with you
Salary information, such as salaries paid, payment details, worked hours, leave and absences, outplacements	To be able to pay your salary and file the information for tax requirements and general administration purposes	Performance of the contract, legal obligation
National Identification Number	To be able to prove that you are the individual working for us	Performance of the contract with you, legal requirement
Performance information, such as the outcomes of performance reviews, ratings, key performance indicators	To be able to determine appropriate compensation and benefits, and monitor and improve your performance as necessary	Legitimate interests of PACCAR to reward, monitor and improve the performance of its employees
Development information, such as training certificates you have obtained, mandatory trainings completed	To be able to track your development, define training needs and determine appropriate compensation and benefits	Legitimate interests of PACCAR to reward, monitor and improve the development of its employees
Travel information, such as itineraries, identification information, expenses made	To be able to book and compensate business required travel	Legitimate interests of PACCAR in order to book and reimburse employees for travel made for business purposes
Photograph, such as your image which is printed on your badge	To identify employees who are allowed to enter our premises	Legitimate interests of PACCAR to protect its business property by being able to identify recognized personnel
CCTV recordings on PACCAR premises	To protect our property and to be able to detect and respond to theft or and hazardous behavior in our company locations	Legitimate interests of PACCAR to protect and secure its business premises and property, while setting up CCTV cameras as much as possible to not permanently monitor employees and limiting the retention of images captured

Working time registration, such as the time you enter and exit PACCAR facilities and at times also at which work station you are operating	To record the correct working time in order to be able to pay your wages and if applicable to comply with social security and tax requirements	Performance of the contract with you
Insurance information, such as your name, date of birth, sex, address, date of employment, annual fulltime salary, part time percentage, national identification number	To provide you with the necessary, required and additional insurance in case of incapacity to work or a layoff	Legal requirement, labour related laws
Pension information, such as your name, date of birth, sex, address, date of employment, marital status, part time percentage, annual fulltime salary, personnel number, national identification number	To provide you with a pension during retirement	Performance of the contract with you (of which pension benefits are a part), Legal requirement
Personal data in our network systems, computer systems, communication equipment, access controls and other internal management/administration information, such as account names, passwords, logging information, your business e-mail account, internet usage etc.	To monitor and investigate compliance with DAF's policies and regulations	Legitimate interests of PACCAR in order to ensure the integrity, confidentiality and availability of networks and systems as well as the appropriate and lawful use of company resources. Monitoring and control abilities are limited to what is described in our IT policy and can only be extended according to the safeguards mentioned in this policy
Personal data, such as your name, job title, e-mail address, attendance to business meetings or (social) business events received in relation to the PACCAR EU Compliance Programm	To monitor and investigate compliance with PACCAR's policies and regulations	Legitimate interests of PACCAR in order to ensure that the business is managed in accordance with the applicable laws and regulations
License number car/motorcycle	To give you access to the premises/parking facilities and to be able to contact you in case of emergency	Legitimate interests of PACCAR to ensure a safe and healthy work environment for its employees
Health & safety information, such as information about your ability to re-integrate in your function	To ensure a safe and healthy work environment for you and your colleagues	Legitimate interests of PACCAR to ensure a safe and healthy work environment for its employees, while making sure medical data is treated confidentially by licensed medical professionals

In addition to your personal data, we also use some personal information of your dependents and other related individuals, which we have summarized in the table below:

Type of personal data	Purpose	Lawful basis
Information about your children, such as their name and date of birth	To invite you and your children to children's events organized by us	Your consent. It is by no means mandatory to share this information with us
Information about your children, such as their name and date of birth	To be able to provide you with parental leave and if applicable to comply with tax requirements	Legal requirement, labour laws
Information about your need to provide care for your partner, children, parent and/or siblings, such as a statement from a medical professional about the amount of care needed from you	To be able to provide you with caregiver's leave and if applicable to comply with tax requirements	Legal requirement, labour laws
Information about your partner, such as your relationship status (married, civil union), name, date of birth and personal identification number of your partner and the name and date of birth of children you might have under the age of 18	To provide partners and children of deceased or incapacitated employees with benefits by insuring them for such events	Your consent. It is by no means mandatory to arrange for (additional) partner/children benefits via PACCAR, but if you want this, we can arrange this for you if you share the necessary information with us based on the legal requirement for us to prove you are entitled to benefits
Information about your medical emergency person, such as his or her name and telephone number	To be able to contact a close friend/relative when you experience a medical emergency on our premises	Legitimate interests of PACCAR to provide a healthy and safe work environment, in line with your interests to be provided with support during a medical emergency

#### How long do we keep employee data?

In general we keep your data for as long as you are employed with us, with some time to allow for the secure destruction of the personal data that is no longer necessary. For tax, pension, insurance and other administration purposes we might be required to keep your personal data after employment. In the next section you can find the categories of personal data we keep after your employment with us has ended.

### 3.3 Former employees

Type of personal data	Purpose	Lawful basis
Contact information, such as your name and home address	To be able to send you updates about us, like a newsletter	Legitimate interests of PACCAR to keep in touch with its retired employees
Wage administration, including tax-exempt reimbursements	To be able to comply with relevant legal requirements	Tax laws
Employee information, such as name, data of birth, national identification number and address, as well as requests to apply a wage withholding tax discount	To be able to comply with relevant legal requirements	Tax laws
Employment contract	To be able to comply with relevant legal requirements	Civil laws
Identification documents of foreign nationals (copy)	To be able to comply with relevant legal requirements	Foreign Nationals laws
Pension information	To be able to comply with relevant legal requirements	Pension laws
Copy of identification documents expats	To be able to comply with relevant legal requirements	Foreign nationals legislation
Information necessary for dispute resolution, such as the grounds and your correspondence with us about a severance or other (in)voluntary exit from our organization	To be able to react to any such claims which might come up after you have (in)voluntarily left our organization	Legitimate interests of PACCAR to be able to effectively react to any claims you might have against us

#### How long do we keep personal data from former employees?

The personal data from former employees we keep in line with relevant legal requirements are kept for as long these legal requirements allow us to keep this personal data. In general, this will mean a retention period from 2 till 7 years after you have left employment at PACCAR or after you have received a certain benefit. For the other personal data mentioned above we will keep it as long as we have a purpose for keeping this personal data.

## 4. Special categories of personal data

Note that under the GDPR, a specific, more stringent data protection regime applies in relation to data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or sex life. In principle, processing these categories of data is prohibited, unless an exception applies. The exceptions are enlisted in the GDPR, and might refer to national law specifying the circumstances under which the exception applies. Also for data relating to criminal convictions and offences a specific regime applies, as well as for the use of national identification numbers.

In line with the GDPR regime, we only process special categories of personal data when an exemption to the general prohibition of processing this data applies. An exemption that might apply to us is that processing of special categories of personal data is necessary for carrying out obligations



and rights in relation to employment law – which are national laws. Whether we are allowed to process your special personal data is subject to national law in your local jurisdiction and further governed by the employment contract with you have with us. Whether we are allowed to process data related to criminal convictions and offences, too, is dependent on national laws applicable in your jurisdiction. Where these exceptions apply, we will provide you with separate information about this, for instance in an annex to this Employee Privacy Statement

When we processor your special personal data, we consider this a high risk personal data processing activity and will apply the highest levels of technological and organizational measures to keep this data safe.

## 5. Who do we share your personal data with?

We share your information with PACCAR related entities, which fall under the same data protection standards. Besides our own entities, we also share personal data with some third parties, summarized in the next section.

### Categories of parties we share personal data with

We share personal data with the following types of organizations:

- Insurance firms;
- Training firms;
- Temporary employment agencies;
- Recruitment firms;
- Pension funds;
- Communication services;
- Employee survey providers;
- Banks;
- Travel agencies;
- IT suppliers;
- Accountants;
- Financial, tax, or legal advisors;
- Forensic specialists.

### How we protect your personal data when we share it with parties that do not fall under European data protection rules

If we share personal data with an organization that does not fall under European data protection rules or has an adequacy decision, we will make sure your personal data is protected by Standard Contractual Clauses from the European Commission, which makes sure that the parties we share personal data with uphold the same standards of data protection as we do.

## 6. How do we protect your personal data?

We care about protecting the availability, integrity and availability of your personal data. We have implemented a number of security measures to help protect your personal data. For example, we implement access controls, use the appropriate system and network security measures like firewalls, patching, protect portable devices with appropriate passwords. For more information, please refer to the IT Services page on DAFweb.

## 7. What are your rights?

Where we process your personal data, you are entitled to a number of rights and can exercise these rights at any point. We have provided an overview of these rights below together with what this entails for you. You can exercise your rights by contacting the HR Service Desk or your local HR Officer. When you send us a message about your personal data, we will get back to you within one month.

### The right to access, correct and receive a copy of your personal data

It is important to us that the personal data we hold about you is accurate, up to date, complete, relevant and not misleading. In order to ensure we uphold this commitment, you have the right to access, correct or update your personal data at any time. Upon request, we will also provide you with a copy of the personal data we hold from you.

### The right to data portability

You are entitled to receive your personal data in a structured, commonly used and machine-readable format if we have processed your personal data for the following legal grounds:

- a) You have given consent to us to process your personal data for a purpose that we have communicated to you beforehand; or
- b) We have processed your personal data in order to facilitate your employment contract; or
- c) We have processed your personal data using automated means (such as profiling).

### The right to deletion of your personal data

You have right to request that we delete your data if:

- a) Your personal data is no longer necessary in relation to the purposes for which we collected it; or
- b) You withdraw the consent that you had previously given us to process your personal data, and there is no other lawful basis to process that personal data; or
- c) You object to us processing your personal data for PACCAR's legitimate interests;
- d) The personal data is not being processed lawfully; or
- e) Your personal data needs to be deleted to comply with relevant legal requirements.

If you wish to delete the personal data we hold about you, please let us know and we will take reasonable steps to respond to your request in accordance with legal requirements.

If the personal data we collect is no longer needed for any purposes and we are not required by law to retain it, we will do what we can to delete, destroy or permanently de-identify it.

### The right to restriction of processing

You have the right to request the restriction of processing your personal data if:

- a) You do not believe the personal data we have about you is accurate; or
- b) The personal data is not being processed lawfully, but instead of deleting the personal data, you would prefer us to restrict processing instead; or
- c) We no longer need your personal data for the purposes we collected it, but you require the data in order to establish, exercise or defend legal claims; or
- d) You have objected to the processing of your personal data and are awaiting verification on whether your interests related to that objection outweigh the legitimate grounds for processing your data.

If you wish to restrict our processing of your personal data, please let us know and we will take reasonable steps to respond to your request in accordance with legal requirements.

#### [The right to object or withdraw consent](#)

You have the right to object to the processing of your personal data at any time, if the processing is based on PACCAR's legitimate interests (see section 3 for an overview). You have the right to withdraw consent for the processing of your personal data at any time, if the processing is based on your consent (see section 3 for an overview).

#### [The right to lodge a complaint with a supervisory authority](#)

You have the right to lodge a complaint directly with the data protection authority about how we process your personal data.