

› NORMS AND VALUES

Norms and Values

What will you find in this chapter?

In this chapter of the TNO Terms and Conditions of Employment we examine all the topics related to the norms and values of TNO and with the norms and values that TNO expects of you as employee. Here you will find references to the TNO code, the TNO Whistleblower Regulation and the integrity complaints centre and how you should handle press contacts.

We also examine Undesired Manners and the confidential advisors within TNO that you can go to, the Complaints Regulation and the rules that govern it as well as the rules relating to using and managing means of communication within TNO.

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TNO code

version 2.0 / 14 September 2020

What is it?

The **TNO code** indicates what we as TNO stand for and is a guideline for employees and executives. It is also a document that may have legal consequences for you as employee. On the basis of this document you may be called to account, judged and, in special cases, sanctioned on the basis of or due to your actions. Through this code TNO shows that it imposes norms on itself and its employees and is, in all reasonableness, thereby accountable. As a TNO employee, you also have the responsibility to read the TNO code on a regular basis, taking note of any changes to it. TNO will remind you of this responsibility periodically (usually every two years) and ask you to state that you have taken note of the TNO code.

Integrity platform

version 1.1 / 14 July 2023

The [integrity platform](#) offers a learning environment to help understand the TNO code, with examples, explanations about the people and bodies that are active in the organisation of integrity, and their tasks. A dilemma bank has been established that contains TNO dilemmas and how to deal with them. The platform provides a clear representation of chapters with which the TNO code has been made more accessible.

Regulations governing the suspicion of wrongdoing TNO

version 2.1 / 15 May 2019

TNO has an internal [Regulations governing the suspicion of wrongdoing TNO](#) whereby if you suspect any wrongdoings or irregularities within TNO, after having taken various steps, you can report to the Integrity Committee without having to be called to account for such if you are acting in good faith. The regulation is not intended for your personal complaints about your work, work relationships, working conditions and legal position. The [Individual complaints regulation](#) is available for this.

To enable matters in the context of the Whistleblower Regulation to be more easily reported, an email address is available for you to send a report: meldpuntintegriteit@tno.nl. This email address will be managed by the Integrity Officer/Central Confidential Advisor of TNO.

Participating in deliveries

version 1.0 / 1 July 2016

You may not participate for yourself in contracts or deliveries to TNO. In special cases articles in stock may be delivered to employees for their own use under the pertinent terms and conditions.

You may not demand, request or accept any fees, remunerations, gifts or pledges that are intended for you unless TNO has given you permission to do so.

See also the [TNO code](#).

Undesired manners

version 1.0 / 1 July 2016

What is it?

Undesired manner:

Every utterance that does not show respect for the other. Undesired manners include sexual intimidation, aggression and violence, pestering, discrimination or other intimidating, humiliating or threatening behaviour, not only towards outsiders.

Sexual intimidation:

Undesired sexually tainted attention that is expressed through verbal, physical or non-verbal behaviour, undesired sexual advances, requests for sexual favours or other behaviour that you, regardless of your gender or sexual preference, is experienced as undesired. Sexually intimidating behaviour may be both intended and unintended.

Aggression, violence, pestering:

Incidents whereby you are physically or mentally pestered, threatened or attacked or whereby behaviour or decisions are negligent and psychological or physical abuse can be constituted, whether intended or unintended.

‘Pestering’ is considered to be the constant enduring and systematic humiliating, intimidating or hostile behaviour towards the same person (or persons) who is (are) unable to effectively stand up to this. Many common forms of pestering are social isolation, making work unpleasant or impossible to do, comments about an individual’s private life, gossip, insulting or deriding people.

Discrimination:

Action based on creed, convictions, sexual disposition, race, gender, skin colour or appearance that are experienced as undesired or unwanted. Discrimination may also be intended or unintended.

TNO tolerates no undesired manners by or towards employees of TNO, including temporary staff, interneers, PhDs or others that work for TNO. The aim of this regulation is to prevent or resist manners that an employee experiences as undesired.

Undesired manners may appear rather innocent, such as a joke about someone’s appearance, but such a comment, certainly when heard on a regular basis, can make one very unhappy and even ill. The same is true of other forms of undesired behaviour. It is often difficult for those affected to put an end to this themselves.

What can you do?

Of course, in the first instance you can best consult your own manager or HR Business Partner. But if you would rather not, you can contact the confidential advisor or submit a complaint (see below).

TNO will ensure that you, as the victim, will not be disadvantaged in your job by consulting a confidential advisor or submitting a complaint.

Confidential advisor

version 2.0 / 1 January 2019

You can consult a confidential advisor for advice and support in undesired manners, business integrity, scientific integrity and conscientious objection (see also the [Integrity platform](#)).

The confidential advisor will initially listen to what you have to say without making any judgement and may then, together with you, take stock of the situation: what is the matter, how long has it been this way, what have you done about it, if anything. The confidential advisor will then ask what you would like to see changed and what help is needed for this.

The confidential advisor is there for you and he or she will only undertake action if you wish it. The confidential advisor acts only on your request and with your permission.

You can call on a confidential advisor until no more than two years after the incident and discontinue the help at any moment. The incident must relate in some way to a relationship with an employee of TNO whereby for the definition of employee refer to the text above.

The confidential advisors may act as the first point of contact when an undesired form of behaviour is reported. Read [here](#) the Procedure for local confidential advisors and central confidential advisor.

Role of the confidential advisor:

- helps find a suitable solution to your problem;
- acts, if wished, as initial point of contact, relief and supervision;
- provides information about the possible consequences of any complaint;
- helps you draft a complaint to the Central Complaints Advisory Committee;
- refers you to internal or external bodies and supports you if you wish to prosecute to the proper authorities in the event of sexual abuse, assault or rape;
- provides psychological and emotional support;
- offers aftercare.

Confidentiality

The confidential advisor is obliged to keep confidential all information about the case, even after it has ended. If it appears necessary to break that confidentiality, the confidential advisor will first discuss this with you.

TNO has assigned both internal and external confidential advisors. The external confidential advisor works at Arbo Beter. You always have the right to consult a different confidential advisor.

The internal confidential advisors can be found [here](#) on the Integrity platform.

External:

Arbo Beter has assigned a confidential advisor for TNO, namely Hannelore Kalter (available on telephone number 06-52 72 07 87 or via email Hannelore.kalter@beter.com).

Complaint

If you feel compromised by an undesired form of behaviour to any reasonable extent, you can complain to the Central Complaints Advisory Committee (CKAC) (see below the section Individual Complaints Regulation) and a meticulous complaints procedure will ensue without your having to suffer any disadvantages as victim, other than the aggravating impact that is associated with the investigation.

If you have tried to find a solution with the help of a confidential advisor and you have to submit a complaint thereafter, then the subsections *Preliminary consultation in the line* and *Formal handling of complaint in the line of the next paragraph* do not apply.

Other rights

This regulation does not prejudice your right to turn to other, for instance external, experts or representatives and to begin other internal or external procedures.

Sanctions

If investigation, by the CKAC or otherwise, reveals that an employee has shown undesired behaviour, sanctions may follow. The imposition of a sanction is done by the Executive Board following a recommendation from the CKAC.

Sanctions may include:

- written warning;
- temporary suspension;
- dismissal (immediate).

Sanctions are always imposed in writing and with reasons.

A written warning is kept in a the personnel dossier for five years.

Suspended employees have no right to a salary during the period of suspension.

Confidentiality

All those who have information concerning the case must adhere to strict confidentiality.

Individual complaints regulation

version 2.0 / 24 August 2020

What is it?

If you are dissatisfied or aggrieved, you should be able to ventilate these feelings within the organisation. This procedure describes what complaints you may submit, to whom you should do so and which procedures apply in that regard.

Definitions

- CKAC: Central Complaints Advisory Committee (*Centrale klacht-adviescommissie*), set up specifically for this regulation (see also the [Regulations of the Central Complaints Advisory Committee \(CKAC\)](#)).
- Advisor: the person you can call on to assist you in submitting your complaint (this is not mandatory). Only the following persons are eligible as advisors:
 - TNO employees,
 - former employees who left TNO less than two years ago owing to old age pension (or temporary old age pension),
 - the confidential advisor (see TNO Terms and Conditions of Employment, chapter: Norms and Values, section: Confidential Advisor).
- Managing Director: the first-echelon manager.
- Complainant: the employee who files the complaint.
- Subject of the complaint: the person against whom the complaint is made.

Purpose of the regulation

The purpose of the regulation is to offer employees the possibility to discuss their dissatisfaction or grievances about certain matters and to have such matters investigated. Your complaint must be handled with fairness and diligence while reasonably protecting your individual interests.

The complaint

A complaint must concern behaviour caused directly or indirectly by TNO, for example a decision or action by one of your colleagues or a manager, or the absence of a decision or action. You may submit a complaint if you consider such a decision or action, or the absence thereof, to be in conflict with:

- provisions of your employment contract,
- guidelines and customary procedures applicable at TNO,
- rules of conduct applicable at TNO,

or a complaint related to undesirable behaviour by a colleague, such as sexual harassment, discrimination or violence (see also TNO Terms and Conditions of Employment, chapter: Norms and Values, section: Undesirable Behaviour).

Admissibility

Your complaint will only be considered in the line or by the CKAC if:

- it is an individual complaint (a complaint from a group or groups of employees is inadmissible),
- you have an interest in the situation addressed by the complaint,
- you have not previously filed a complaint about the same event or fact,
- the solution to the complaint lies within TNO's possibilities.

Your complaint will not be considered if:

- you are a member of the Executive Board and/or the complaint is directed against a member of the Executive Board (such a complaint should be submitted to the Supervisory Board),
- it concerns a matter that is or was the subject of legal proceedings,
- it concerns a proposed dismissal on which employee insurance agency UWV or a court must decide,
- it concerns a subject to which a special appeal procedure applies,
- you have not followed the procedure in this Individual Complaints Regulation.

If you are a Managing Director and/or if the complaint is directed against a Managing Director, the complaint will not be processed in the line and may be submitted directly to the CKAC.

A complaint need not be handled in the line if it relates to undesirable behaviour (in this regard, see the TNO Terms and Conditions of Employment, chapter: Norms and Values, section: Undesirable Behaviour). In that case, you may submit your complaint directly to the CKAC.

This regulation is without prejudice to your statutory or contractual right to assert any other rights or claims.

You may withdraw the complaint in writing at any time.

The advisor

You may call on an advisor of your choice to assist you in drafting and filing your complaint. He will support you at every step of the way and reports only to you. Engaging an advisor is not mandatory.

Preliminary consultation in the line

If you intend to file a complaint, you must always discuss the issue first with your manager, whether or not accompanied by your advisor, to try and find a mutually agreeable solution. If you have a complaint about your manager, you must discuss this first with his or her manager.

This oral preliminary consultation will take place within 10 working days of your submission of a written request to that end. At your or your manager's request, the next-higher manager or the relevant HR Business Partner will take part in this consultation.

If the preliminary consultation does not lead to a solution that is acceptable to you, you may initiate the formal complaints procedure, as described below.

Formal handling in the line

You must submit the complaint by letter. You must describe the reason for your complaint and the result of the preliminary consultation as accurately as possible.

You must declare that your manager is aware of your complaint and, if you have an advisor, state who will be acting in that capacity. You must send the letter, dated and signed, to your Managing Director, who will confirm receipt as soon as possible and subsequently initiate an investigation.

The Managing Director will inform the subject of the complaint that a complaint has been filed against him and send him a copy of the complaint. The subject of the complaint will be asked to send a written response to the Managing Director as soon as possible, but no later than 10 working days after receipt of the copy. The response received from the subject of the complaint will be shared with you.

The Managing Director may give you and the subject of the complaint the opportunity to explain the matter in person or in writing. If necessary, he will hear other persons involved. Both sides of the argument are heard, in principle.

It is preferable that a decision be taken by the Managing Director based on written documents, in which case a hearing is dispensed with.

The Managing Director will inform you and the subject of the complaint in writing, within 20 working days of receipt of the complaint, of:

- his decision and his reasons for the decision, or
- the fact that he is not authorised to take the decision.

After receipt of the Managing Director's material decision, you may optionally submit a complaint to the CKAC. The same applies if you have not received a reasoned decision from the Managing Director within 30 working days after the complaint was received (in this regard, see the Regulations of the Central Complaints Advisory Committee (CKAC)).

Suspensive effect and irrevocability

While the submission of a complaint does not, in principle, have suspensive effect on the behaviour to which the complaint pertains, you as complainant are nevertheless entitled to submit a clearly reasoned request to that end. The Managing Director may then decide to prohibit this behaviour during the handling of the complaint. There must be valid reasons to do so, and it must be appropriate under the circumstances.

The Managing Director's decision is final once the period for filing a complaint with the CKAC has expired. The final decision on the complaint will either allow or forbid the behaviour to which the complaint pertains. If the disputed behaviour is forbidden, the decision will have retrospective effect to the date on which the behaviour began.

This regulation is without prejudice to your statutory or contractual right to assert any other rights or claims.

Protection and confidentiality

TNO guarantees that the submission and handling of a complaint will have no adverse effects on the legal position of the complainant or his advisor, if employed by TNO.

Everyone involved in the handling of the complaint is obliged to observe confidentiality with regard to everything that comes to their knowledge.

Archiving

All documents relating to a complaint will be kept in the central complaints archive for a maximum of seven years.

Other norms

version 1.0 / 1 July 2016

What is it?

Apart from the sections in this chapter that focus on a whole range of specific norms, there are norms to which you as an employee must also adhere and on which you are judged. The norms are predominantly outlined in the TNO code and the specifics of them are implemented by the various staff departments of TNO.

An important objective of these norms and methods are described in the management system of TNO. The norms can also be found via the pages of the corporate staff bodies.

Management and use of IT devices, information and systems

version 2.1 / 14 July 2023

What is it?

- **IT devices:** (personal) computers (pc), laptops, tablets, servers, (mobile) telephones, smartphones.
- **Workspace device:** a pc, laptop or tablet TNO puts at your disposal for your work.
- **Information and systems:** all information generated and/or managed and/or stored by TNO and its employees and all systems and resources used to do this, such as:
 - computer systems and software;
 - datacarriers;
 - IT devices;
 - networks, intranet, internet, e-mail, messaging software;
 - tokens, printers, scanner and other peripheral equipment.
- **Personal storage space:** that part of the TNO datastorage you are given to store your own work-related data, e-mails and other messages.
- **Private storage space:** those parts of different data storage locations intended for the storage of private information, such as
 - a private Onedrive based on a private Microsoft account.
 - a private folder within a personal storage space (CIFS, Sharepoint MySite, My Local Documents).
 - The private folder in the personal TNO mailbox.

Storage of user data

The data you use as user will in principle not be stored any longer than three months unless law or legislation stipulates a longer period.

Management and use of IT devices

IT devices, information and systems are intended to boost productivity, with an optimum balance between costs, safety and use.

See for their allocation chapter [My Benefits](#), section on IT devices, information and systems.

Use of IT devices

The IT devices are the property of TNO and these are put at your disposal. You treat the devices with care and prevent damage, theft or loss. In the event of damage, theft or loss, you must notify the IT Service Desk within 24 hours.

The devices are, in principle, for business use. Personal use is allowed provided that this does not conflict with your work and the stipulations in this regulation and TNO regulations, including the Security schemes .

The use of the devices, information and systems may not harm TNO, your colleagues or thirds parties. In any case, you may not:

- send messages of a threatening, racist, insulting, discriminating or sexually offensive nature;
- send, upload or download messages or files of such a size that network and telephone traffic is hindered;
- send private chain letters;
- visit internet webpages that contain pornographic, racist, discriminating or offensive material;
- visit internet webpages or Phone Telephone numbers for the purpose of gambling;
- act in conflict with the law or ethics (see the TNO Code for guidelines);
- use websites (or other semi-public accessible forums) to comment or undertake other activities that may harm TNO or its customers either directly or indirectly;
- call telephone services that contain messages of a threatening, racist, insulting, sexually tainted or otherwise offensive nature;

- call telephone numbers of a private nature, incurs costs in addition to the normal charges unless it is impossible to obtain the information via a private phone;
- make excessive private phone calls abroad or from abroad.

TNO is not liable for damage or fines as a result of unauthorised or careless use of IT devices.

Control of the use of IT devices by TNO

TNO assumes a good balance between control protection of your privacy, with this regulation leading. In situations not covered by this regulation, TNO acts in accordance with the regulations and legislation applicable to its organization, such as the General Data Protection Regulation (GDPR), the Works Councils Act, the Criminal Code and the labour law framework. See also [TNO Privacy Policy](#).

Control has the exclusive aim of:

- safeguarding systems and networks;
- protecting company secrets;
- preventing negative publicity;
- counteracting unpermitted use (see [Use of IT devices](#));
- protecting business continuity (control of internet or e-mail traffic for viruses or other malware, or hindrance to the infrastructure);
- management of costs and capacity.

Control is automated in principle (virus scanners etc.). Only if there are compelling reasons (such as a reasonable suspicion of unpermitted use or the violation of company secrets) will the content be investigated by an authorised person.

E-mail and other kinds of message from or to OR and OC members, company doctors and other confidential advisors that are privy to a company secret or have a right to confidentiality are, in principle, excluded from control of content.

A check of the data of the above-mentioned persons is carried out by an authorised person and in the presence of another Works Council member in the case of a Works Council member and/or another confidential advisor in the case of a confidential advisor.

For costs and capacity management the control will be limited to datatraffic (time, quantity, size). Your manager responsible for the costs has access to your entire datatraffic but sees no individual conversations or messages.

If a control reveals a violation of the regulations, the manager of the respective user will be informed immediately. The manager must observe strict confidentiality about this until such time as a hearing has taken place. If no violation is evident, the investigation material will be destroyed.

Regular control will be performed by or for the Information Services department. The Security Risk & Compliance manager, the Corporate Security Officer TNO, a Managing Director or the Executive Board may decide to have further investigation carried out by a member of the Information Services department or by externally contracted expertise, if there are reasonable grounds for suspecting irresponsible use of the IT devices.

This employee of the Information Services department or an external party must keep confidential all the information he or she acquires, unless by reason of legal requirements.

Management and use of information and systems

The regulations for the use of information and systems are stipulated in:

- The TNO Security Policy, on TNO City: [TNO Security Policy](#);
- The details of the TNO security policy for ensuring the reliability of the data and the network infrastructure. TNO City: [Details of TNO Security Policy](#), .

You are expected to use information and systems in a responsible way.

Your network and e-mail account are strictly personal and may not be given to third parties.

You may allow any significant changes to be made to the configuration of systems.

Access to e-mail messages, files and other text messages

TNO respects and protects your privacy concerning personal e-mail messages, files and other text messages on your IT device and your personal storage space. All non-private messages and files are company information and thus the property of TNO. You must make this information available to your manager on request.

If you are absent for an extended period, leave TNO or end your employment contract in any other way, your manager has a right to inspect and act on your personal storage space. Excluded from this are your private storage spaces. You will be informed of this by means of an e-mail (in the situation of temporary absence).

Violations

Violation of the rules of conduct for IT devices, information and systems will be reported by the TNO Security Operation Center (SOC) whether the manager of the alleged offender reports this to the Corporate Security Officer of TNO.

In the event of unpermitted use or a violation of the rules of conduct, you will be informed verbally of this by your manager within two weeks of the observation, in the presence of the HR Business Partner. This may take longer for compelling reasons, such as essential further investigation.

You will have the opportunity within a reasonable period to have your say about the observation and have the right to inspect the information registered about you.

Having heard what you have to say, your manager may decide whether to take appropriate measures (see next section) depending on the seriousness of the conduct.

Your manager will inform you of the decision on the measure in writing, giving reasons, within two weeks of your reaction.

You may submit a complaint about the decision by reason of the Individual Complaints regulation.

Appropriate measures

Appropriate measures are considered per situation. The examples below are not exhaustive.

Appropriate measures may include:

- Written warning;
- Compensation of the costs by you for any damage or loss to equipment due to your carelessness or negligence;
- Compensation of the costs of subscription and use upon demonstrable excessive private use;
- Termination of the employment contract.

Works Council (OR)

Information Services will produce a report annually on control of the use of the IT devices upon request by OR who may also request the Corporate Security Officer of TNO to produce a report annually on the control and measures regarding information and systems.

Contacts with the media

version 2.0 / 1 April 2020

What is it?

These rules of conduct foster optimum support for the publicity around TNO and prevents you undertaking action, making statements or offering opinions that conflict with the interests of TNO or yourself.

The rules

All contact with TV, radio and the written press is handled by the Press & Media department. If a representative from one of these media approaches you, this can be a great opportunity for publicity for TNO. However, you should not answer the questions nor commit to anything immediately. Write down the question and refer it directly to one of the [Marketing & Communication press officers](#). This also applies if the media approach you via LinkedIn. If this is not possible, make a note of the contact details and call or email the Press & Media department.

The press officer will take a closer look at the request of the media concerned and will coordinate with you on if, how and by whom within TNO a follow-up should be provided. In this way, TNO can generate the right image in the media with the right, well-prepared expert.

Referral to a press office is a common way of working for most journalists. However, they often try a direct approach, hoping to speak to a specialist immediately. Talking to the media requires careful coordination and preparation, such as by first reviewing the file and contacting the customer, if there is one. Starting the conversation in a spontaneous and unprepared manner can lead to unpleasant situations. This is why the press officers coordinate contact with the media in these kinds of situations, advising and guiding researchers and management and, where necessary, acting on behalf of TNO as a spokesperson.

Also inform this colleague as soon as possible of a lecture you will be giving, your contribution to a symposium, conference or prospective scientific publication. Your colleagues from Marketing & Communications will assess the usefulness of approaching the media about this and may include this in the Content calendar.

This also applies to research or other TNO involvement that you believe might interest the media. Of course, confidential research for a customer is excluded here. Marketing & Communications can advise you and supervise you in your contacts with the media.

Employee participation is an exception to these rules. The Works Council and Sub-committees have their own responsibility for their contacts with the media about employee participation matters and this does not involve the intervention of Marketing & Communications.

Guideline providing personal data

version 3.2 / 14 July 2023

The basis for this section is the General Data Protection Regulation (GDPR).

What is it?

Personal data are data that, directly or indirectly, provide information about an individual, even where this information is not a piece of personal data as such but still says something indirectly about that person, such as his or her social status. Examples are name and address details, date of birth, nationality, civil status, salary, assessment data, IP address. Data that cannot be traced to persons fall outside this scope.

Personal data administration

HR Services is responsible for the personal data of employees.

That are stored in various ways and places:

- in the personnel and salary administration system SAP-HR;
- in the digital personnel dossiers (application-based on SAP-Open Text);
- in the physical personnel dossiers used in the past. These are stored in locked cabinets in the archive room at the Oude Waalsdorperweg location in The Hague;
- in the FlexDirect flexible choice of terms and conditions of employment system (application-based on SAP-HR);
- in the absence due to illness system Re-IntegratieDirect (application-based on SAP-HR);
- in the recruitment system Connexys/Bullhorn;
- workflow system Outsystems;
- talent-system 'Cornerstone'
- in SV's here part of the information is stored digitally. These SV's are strictly protected and only a very limited group of HR employees may access them.

Authorisations for SAP-HR and the other applications are stipulated in relevant application and can be requested via HR Functional Application Management. Access to and modification of data are subject to strict rules and only the necessary information is made available.

Provision of personal data

By the employee

When you join TNO you are legally obliged to provide TNO with the personal data essential to good personnel and salary administration.

By Human Resources

Information Services regularly receives requests to inspect or supply personal data. However, these requests must go through the HR department, which checks whether the data may be provided in line with the guidelines below. HR exercises restraint in this. For each application HR reviews the purpose for which the applicant wishes to acquire the data.

Guidelines for providing personal data

Right to inspect own data

Via TNO Tools/Navigator/Tools/My Personnel File (NL)

you can inspect the data stored in your digital personnel dossier. The rules governing the storing of the data can be found in the document [Digitisation of Personnel Dossiers](#).

Providing data internally

To HR and salary administration employees

Provision and inspection of your personal data are allowed if deemed essential to the job performance of the following employees: Manager HR, HR Business Partners, HR Services employees, Corporate HR, other HR and salary administration employees.

To your manager

Your manager may ask you for all the data about you provided he needs these data to perform his or her job. The same applies to his or her superior.

To staff

In the area of occupational health & safety and security the Facility Manager and the Corporate Security Officer (and a few of their employees) may inspect your data if deemed essential to their job performance. For the purpose of internal audits the internal auditor appointed by the Executive Board may inspect data deemed essential to the audit. Furthermore, other staff may have access to essential data due to their authorisation roles.

To other employees

All other employees have access to a defined set of personal data such as published in 'Lookapp' on SharePoint.

Providing data externally

Data that are not traceable to persons may be provided, for example for participation in surveys or studies. TNO does not provide personal data to external parties without your permission.

Exceptions:

- **Law and legislation** may compel TNO to provide personal data to law enforcement agencies or other government bodies like the Tax Authorities, UWV, Labour Inspectorate or for accountancy audits. TNO may also do this if making such data public is necessary to prevent damage(s) or in connection with criminal investigation. TNO always requests investigating officials to first authenticate their identity.

- **In the context of work, absence and re-integration**

Occupational health & safety unit to TNO:

For TNO the company doctor undertakes (socio-)medical supervision of employees that are ill. The law prescribes that the company doctor may provide certain information about you to TNO, if need be without your permission, although you must be informed about the information provided. The company doctor is confined to giving TNO specific information about the work you are or are not able to perform and the measures necessary to enable you to return to work or re-integrate. The company doctor does not provide medical data. To do this your explicit permission is required.

TNO to the occupational health & safety unit:

TNO provides the occupational health & safety unit only with your name and address details but no information concerning your salary or assessment.

- **Other parties (health insurer, pension fund, personal insurance risk insurer, insurer / administrator WGA shortfall insurance, sickness benefits administrator)**

TNO provides only data needed for the service to be delivered.

- **Providing data upon transfer of the company**

In the event of a (possible) company transfer, TNO retains the right to transfer personal data with the aim of drafting a 'letter of intent' and the actual establishment of proper personnel and salary administration.

Personnel dossiers are not transferred. Documents that are needed by the receiving employer for the correct implementation of the agreements contained in the employment contract of employees that transfer, such as the job contract and letter of transfer, are provided as copies. You can indicate yourself whether you wish a copy of other documents to be transferred.

Providing data after leaving employment or in the event of death

This scheme (Guideline 'Provision of personal data') also apply after you leave employment or in the event of your death.

Personal data retention period

HR keeps the personal data for as long as the law prescribes, after which the data are destroyed. See also document [Digitisation of Personnel Dossiers](#). Requested personal data will be kept out of the reach of others and destroyed immediately after use.

Complaint

If you are not in agreement with TNO conduct in this respect, you may submit a complaint in line with the individual complaints regulation. A complaint can be about a decision, an action or the omission thereof.