

CANDIDATES PRIVACY POLICY

This privacy policy (the "**Policy**") covers the use by SERB HOLDING FRANCE SAS, whose registered office is located at 40 avenue George V, 75008 Paris (the "**Company**", "**we**", "**us**", "**our**") of personal data concerning candidates ("**you**", "**your**").

1. Our data protection commitments	1
2. What data do we process?	1
3. How do we process your data?	2
4. How do we collect your data?	4
5. With whom do we share your data?	4
6. How is the outsourcing of your data managed?	5
7. Are your data transferred outside the European Economic Area?	5
8. What are your rights?	5
9. How do we guarantee the security of your data?	6
10. Questions and complaints.....	6
11. Miscellaneous.....	7

1. OUR DATA PROTECTION COMMITMENTS

- 1.1 The Company is committed to making data protection and privacy a key value.
- 1.2 The Company undertakes to use its best efforts to comply with applicable data protection legislation, including Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, when processing personal data, and repealing Directive 95/46/EC (the "General Data Protection Regulation") (the "**GDPR**") and Law No. 78-17 of 6 January 1978 relating to information technology, files and freedoms (together, the "**Applicable Data Protection Legislation**").

2. WHAT DATA DO WE PROCESS?

- 2.1 The Company processes the following personal data for the purposes described below:
 - Personal identification data (surname, first name, date and place of birth, professional background and qualifications (academic and professional), gender, nationality and work permit for the place where you are applying, your civil and marital status) ;

- Contact data (e-mail address, postal address, other contact details including mobile phone number) ;
- Any other data that may be provided in support of your application, including, but not limited to, information contained in your CV and/or application email, and the reasons for your application.

2.2 We do not collect special categories of data or sensitive data, unless you provide them in your CV or the position requires the provision of information relating to your medical or disability situation.

3. **HOW DO WE PROCESS YOUR DATA?**

(a) Purposes

3.1 The Company processes your personal data for the following purposes:

- Examination of your application and assessment of your abilities, skills and suitability for the position;
- If necessary, communication with you about the recruitment process;
- Verification and control of the information you communicate to us, directly or through authorised third parties;
- If necessary, check your criminal record if this is necessary for the position concerned, in compliance with legal obligations;
- Keeping records of your recruitment process;
- Carrying out statistical studies ;
- Satisfaction of our legal and regulatory obligations;
- Acknowledgement, exercise or defence of our rights.

(b) Legal basis

3.2 The collection and processing of your personal data is based on the execution of pre-contractual measures, on our legitimate interests and on the legal obligations we have to comply with. Exceptionally, the processing of your data will be based on your free and informed consent.

Where collections and processing are based on our legitimate interests, these interests do not appear to us to take precedence over your interests and fundamental rights and freedoms.

(c) How long do we keep your data?

- 3.3 Your personal data is kept by the Company for periods not exceeding those necessary for the purposes for which it is processed, taking into account the sensitive nature of the data processed, the applicable statute of limitations and the legal or regulatory obligations imposed on the Company.
- 3.4 We will retain your personal data for a maximum period of two (2) years from the last contact. Beyond this period your data will be regularly deleted unless it is necessary to keep them longer (i) to ensure compliance with legal, accounting and tax retention obligations, (ii) for the retention of evidence during the applicable limitation periods, (iii) for the exercise of our rights in the event of litigation or legal action throughout the period of the proceedings or investigation.
- 3.5 You may, however, allow us to retain your data longer so that we are in a position to offer you a job when the opportunity arises.

In this regard, we will seek your consent to retain your data beyond the period of two years from our last contact, and will delete your data once you withdraw your consent, unless it is necessary to retain it for longer (i) to ensure compliance with legal, accounting and tax retention obligations, (ii) for the retention of evidence for the applicable limitation periods, (iii) to exercise our rights in the event of legal or judicial action throughout the period of the proceedings or investigation.

- 3.6 You may withdraw your consent at any time by emailing dpo@serb.eu.

Withdrawal of your consent will not affect the validity of processing operations carried out on this basis prior to the date of withdrawal.

(d) Synthesis

- 3.7 The processing of your personal data can be summarised as follows:

Processing activity	Collected data	Legal basis
Examination of your application and assessment of your abilities, skills and suitability for the job	Personal identification data Contact details Other application data	Execution of pre-contractual measures
Communication as part of the recruitment process	Personal identification data Contact details	Execution of pre-contractual measures
Checks and controls of the information provided	Personal identification data Other application data	Legitimate interest of the Company to verify the information provided by the candidate
Criminal Record Check	Personal identification data	Legal obligation

Creation of a CV database	Personal identification data Contact details Other application data	Legitimate interest of the Company to create a candidate base Consent
Carrying out statistical studies	Personal identification data Contact details Other application data	Legitimate interest of the Company to compile recruitment statistics

4. HOW DO WE COLLECT YOUR DATA?

4.1 We collect your personal data:

- directly to you through your application (CV, application email, phone call) or through our authorised staff,
- indirectly from other entities of the SERB Group, or
- indirectly when this information has been made public on social networks (via LinkedIn for example), if necessary with your recruitment agency or ours, or with third parties in the context of preselections, background and/or reference checks that we may carry out, to the strict extent permitted by law.

5. WITH WHOM DO WE SHARE YOUR DATA?

5.1 If necessary, we will forward your personal data to the following recipients:

- The entities of the SERB Group located within the European Economic Area;
- Our hosting and archiving technical service providers are also located within the European Economic Area;
- Our legal advisers and/or attorneys and those of potential purchasers in the context of restructuring operations, disposals, mergers and acquisitions or litigation;
- The courts and tribunals in the event of a dispute involving you;
- The law enforcement authorities in the event of the observation or suspicion of the occurrence of an offence involving you in accordance with or as required by the applicable law.

5.2 In the event of a restructuring, disposal or merger (including reorganisation), we may transfer your personal data to a third party involved in the transaction (for example, a purchaser) in accordance with Applicable Data Protection Legislation.

6. HOW IS THE OUTSOURCING OF YOUR DATA MANAGED?

- 6.1 We take appropriate steps to ensure that our contractors process your personal data in accordance with Applicable Data Protection Legislation.
- 6.2 These measures include the signing of a data processing agreement which requires the subcontractors, among other things, to process your personal data only on our instructions, not to engage a second-tier subcontractor without our consent, to take the appropriate technical and organisational measures to guarantee the security of your personal data, to ensure that the persons authorised to access the data are subject to confidentiality obligations, to return and/or destroy your personal data at the end of their assignment or contract, to undergo audits and to provide us with assistance in following up on your requests to exercise your rights in relation to your personal data.

7. ARE YOUR DATA TRANSFERRED OUTSIDE THE EUROPEAN ECONOMIC AREA?

- 7.1 It is not our intention to transfer your data outside the European Economic Area. If this is the case, we will inform you of this and obtain your prior consent to do so, and will enter into any appropriate contractual arrangements in accordance with Applicable Data Protection Legislation.

8. WHAT ARE YOUR RIGHTS?

- 8.1 In accordance with Applicable Data Protection Legislation, you have the right to access, rectify and delete your personal data, the right to object to or limit the processing of your personal data, the right to portability of personal data and the right to set guidelines as to the fate of your personal data after your death.

Law	What does this mean?
<i>The right of access</i>	You have the right to obtain a copy of your personal data.
<i>The right of rectification</i>	You have the right to obtain the rectification of your personal data if they are inaccurate or incomplete.
<i>The right to erasure (the "right to forget")</i>	You have the right to obtain the deletion of your personal data. However, the right to erasure (or the "right to forget") is not absolute and is subject to specific conditions. We may retain your personal data to the extent permitted by applicable law, and in particular where processing is necessary to comply with a legal obligation to which the Company is subject or to establish, exercise or defend a legal claim.

<i>The right to limitation of processing</i>	You have the right to obtain the limitation of the processing in certain circumstances (e.g. when the Company no longer needs your personal data but they are still necessary for the establishment, exercise or defence of a legal claim).
<i>The right to the portability of personal data</i>	You have the right, in certain circumstances, to receive the personal data concerning you that you have provided to the Company in a structured, commonly used and machine-readable format and to pass it on to another controller.
<i>The right to object to processing</i>	You have the right to object to certain types of processing (e.g. when the processing is based on the legitimate interests of the Company).
<i>The right to withdraw consent</i>	If you have given your consent to the Company's processing of your personal data, you have the right to withdraw it at any time.
<i>The right to set guidelines on the use of your data after your death</i>	You can define guidelines for the storage, deletion and disclosure of your personal data after your death. These guidelines may be general or specific. General guidelines are registered with a trusted third party. Special guidelines are stored with the Company.

8.2 Please send us any request concerning your rights in relation to your personal data by email to dpo@serb.eu. We will deal with your request as soon as possible and always within the time limits provided for by the Applicable Data Protection Legislation. Please note that we may retain your personal data for certain purposes where required or permitted by law.

9. HOW DO WE GUARANTEE THE SECURITY OF YOUR DATA?

9.1 We take appropriate technical and organisational measures to ensure a level of security appropriate to the risks associated with your personal data. We follow industry best practices to ensure that personal data is not accidentally or unlawfully destroyed, lost, altered, unauthorised disclosure or unauthorised access.

10. QUESTIONS AND COMPLAINTS

10.1 If you have any questions or complaints regarding the processing of your personal data by the Company, please contact our data protection officer by email at dpo@serb.eu.

10.2 You have the right to submit a complaint to the competent supervisory authority:

*Commission nationale de l'informatique et des libertés
3 Place de Fontenoy - TSA 80715 - 75334 Paris CEDEX 07
Tel: 01 53 73 22 22*

11. MISCELLANEOUS

11.1 The Company reserves the right to update this Policy at any time. If we make changes to this Policy, we will notify you so that you are always aware of how we treat your personal data.