



DILI TRUST

PRIVACY POLICY JOB APPLICANTS

1. PREAMBLE

DiliTrust is committed to the protection of personal data and the privacy of individuals. As such, we hereby inform you of the conditions under which your personal data will be processed by us.

This Policy applies to applicants for employment.

These persons are hereinafter referred to as "Data Subjects".

2. DATA CONTROLLER

DiliTrust
Tour Opus 12, 77 Esplanade du Général de Gaulle
92081 PARIS LA DEFENSE CEDEX
RCS of Nanterre: 400 701 918

Depending on the concerned office:

DiliTrust Canada Inc.
2045 Stanley Street, suite 1500
Montréal, QC, H3A 2V4
Canada

3. WHAT PERSONAL DATA DO WE PROCESS?

DiliTrust processes the following categories of personal data about Data Subjects:

- Identification data: last name, first name, postal address, email address, telephone number, photo if present on CV, login and password
 - Data related to professional life: Elements indicated on the CV and cover letters, elements collected during the interview presenting a direct and necessary link with the proposed job or with the evaluation of professional aptitudes: training, experience, languages practiced, functions performed, professional experiences..."
 - Data related to personal life: Elements indicated on the CV, cover letters and during interviews.
 - Economic and financial data: Salary of the previous/current position, expectations
 - Connection data: logs, time stamps, navigation path, type of browser
 - Location data: country
 - Internet data: IP address, browser language
 - Data on criminal and administrative proceedings or sanctions for certain employees with privileged administrator access: criminal convictions (submission of a copy of the criminal record Bulletin N°3)
 - Social security number
- Your personal data comes exclusively from you. It is only the data that you have chosen to share with DiliTrust. DiliTrust processes only the personal data strictly necessary to achieve the determined and legitimate purposes defined in the following sections.

4. WHY AND HOW DO WE PROCESS YOUR PERSONAL DATA?

DiliTrust is required to process the personal data of Data Subjects for these purposes:

Recruitment	
Objectives and basis of legality	<p>Job applications management (Pre-contractual requirement)</p> <p>Creation and management of Resume database (legitimate interest)</p> <p>Insure future employees have no criminal record for position requiring a clear record (Pre-contractual requirement)</p> <p>Have evidences available in case of litigation or administrative control (legitimate interest)</p>
Length of retention	2 Years
Categories of recipients	<p>HR</p> <p>General management</p> <p>Hiring manager</p> <p>Headhunters and recruitment agencies</p>
Data sources	Data subject
Mandatory or optional nature of the data collection and consequences in case of non supply of the data	Necessary for the processing of the application

Contract management	
Objectives and basis of legality	<p>Internal contract management (Legal requirement)</p> <p>For HR and legal followup (Legal requirement)</p>
Length of retention	10 years after end of contract
Categories of recipients	<p>HR</p> <p>Legal department</p> <p>General Management</p>
Data sources	Data subject
Mandatory or optional nature of the data collection and consequences in case of non supply of the data	Necessary for the fulfilment of legal obligations in the field of labour law

GDPR	
Objectives and basis of legality	Respond to exercises of rights (legal obligation)
Length of retention	<p>3 years after the closure of a request for opposition (Statute of limitations for a crime)</p> <p>1 year after the closure of a request for access, deletion or rectification (Statute of limitations for a crime)</p>

Categories of recipients	CNIL DPO Legal Department
Data sources	Data subject
Mandatory or optional nature of the data collection and consequences in case of non supply of the data	Necessary for the fulfillment of legal obligations regarding the reporting of violations and the exercise of rights.

In view of the purpose of each processing, DiliTrust implements the necessary means to ensure that personal data is only accessible by its internal departments that need to know it, third party recipients designated by the Law or subcontractors necessary to carry out the processing (see 3).

DiliTrust keeps the data collected for the time strictly necessary to achieve the purpose of each processing, except for exceptions provided for by the Law. These retention periods are communicated in the table opposite. In application of the RGPD, it is possible that your data may be kept by us for the time that the limitation periods for legal action are reached. In this case, only the persons in charge of the litigation within the company have access to it. At the end of these periods, your data is either deleted or irreversibly made anonymous.

5. TO WHOM ARE YOUR PERSONAL DATA TRANSMITTED OUTSIDE THE COMPANY?

DiliTrust is led to communicate your personal data to organizations within the framework provided by the Law. These recipients are indicated in the table (see 2.).

DiliTrust has recourse to subcontractors selected by it to carry out all or part of the processing indicated. DiliTrust may communicate your data to group subsidiaries for processes necessary to fulfill the purposes described herein. In exceptional cases, DiliTrust may use service providers located outside the European Union. Where applicable, DiliTrust ensures that the transfer to a third country is made legally by ensuring protection and guarantees provided by applicable laws, notably by the RGPD where applicable.

Subcontractor	Category	Country	Type of warranty (if third party country transfer)
Welcome to the Jungle	Recruitment	European Union	N/A
Softgarden	Recruitment	European Union	N/A
Recruitment agency	Recruitment	France	N/A
JobTeaser	Recruitment	France and European Union	N/A
LinkedIn	Recruitment	United States	DPA et CCT
Adobe	Contract management	United States	DPA
Hunteed	Recruitment	France	N/A
Infojob	Recruitment	EU	N/A
APEC	Recruitment	France	N/A

6. WHAT SECURITY MEASURES DO WE PUT IN PLACE TO PROTECT YOUR DATA?

DiliTrust implements all organizational and technical measures to ensure an appropriate level of security for your personal data, and in particular to avoid any loss of confidentiality, integrity or accessibility.

7. WHAT ARE YOUR RIGHTS ON YOUR PERSONAL DATA?

You can exercise the following rights with DiliTrust regarding your personal data:

A right of rectification: you have the right to obtain the rectification of inaccurate data concerning you. You also have the right to complete the incomplete data concerning you, by providing a complementary declaration. If you exercise this right, we undertake to communicate any rectification to all the recipients of your data as far as possible.

A right to erasure: In some cases, you have the right to have your data erased. However, this is not an absolute right and we may for legal or legitimate reasons retain this data.

A right to the limitation of processing: in certain cases, you have the right to obtain the limitation of processing on your data.

A right to portability of your personal data: you have the right to receive your data that you have provided to us, in a structured, commonly used and machine-readable format, for your personal use or to pass it on to a third party of your choice. Moreover, DiliTrust may refuse the exercise of this right if it would require technical means deemed excessive.

A right to object to processing: you have the right to object at any time to the processing of your data for processing. This is not an absolute right and we may for legal or legitimate reasons refuse your request to object.

The right to withdraw your consent at any time: you may withdraw your consent to the processing of your data where the processing is based on your consent. Withdrawal of consent does not affect the lawfulness of processing based on consent carried out prior to such withdrawal.

The right to give instructions regarding the fate of your data after your death.

DiliTrust will respond to any exercise of rights as soon as possible and in any event within 30 days of receiving the request. DiliTrust reserves the right:

To request proof of the identity of the applicant in case of reasonable doubt, in order to respect its obligation of confidentiality,

To extend the response time by two months, informing the applicant of this extension and the reasons for the postponement within one month of receipt of the request,

To refuse to respond to an exercise of a right if it is considered abusive (in view of their number, repetitive or systematic nature).

8. HOW TO EXERCISE YOUR RIGHTS ON YOUR PERSONAL DATA?

To exercise your rights, you can contact us to this address: contact-dpo@dilitrust.com

or by post at the address indicated above.

If, in spite of our efforts and commitments, you believe that your rights concerning your personal data have not been respected, you may submit a complaint to your competent supervisory authority.

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