

Personal data protection policy for Candidates

Last update : July 2023

Preamble

Didomi, as an employer, attaches the utmost importance to the protection of Candidates' Personal Data.

For this reason, Didomi undertakes to implement appropriate measures to ensure the protection, confidentiality and security of Candidates' Personal Data, in accordance with applicable legal requirements and in particular Law no. 78-17 of 6 January 1978 as amended (known as the "Informatique et Libertés" law) - and any laws or regulations that may supplement or replace it - and European Regulation 2016/679 on the protection of personal data (hereinafter the "GDPR").

The purpose of this Personal Data protection policy is to provide you with information on the various Processing operations carried out by Didomi on your Personal Data in your capacity as Candidates. You will find in this document relevant information on the Personal Data that we collect about you, the various uses made of your Personal Data or information on your rights relating to your Personal Data and how to exercise them.

Please note that this personal data protection policy may be modified in line with changes in legislation, regulations or Didomi's changing practices. You will find the date of the last update of this policy at the top of the document.

Definitions

"Personal Data": refers to any data that directly or indirectly identify a natural person.

"Data processing": refers to all operations carried out on Personal Data, in particular collection, recording, use, transmission or communication.

"Data controller": refers to the legal entity responsible for determining the purposes of the processing and the means used.

"Processor": refers to the legal entity that processes personal data on behalf of the Data Controller.

"Candidate(s)" means any natural people applying for a job, internship or apprenticeship with Didomi.

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Identity of the Data Controller

Didomi, a simplified joint stock company with its registered office at 137 Boulevard de Sébastopol in Paris, registered with the Paris Trade and Companies Register under number B 831 722 756, is the Data Controller for the processing of the Personal Data of Candidates applying for one of its job offers, internships or apprenticeships, within the meaning of the regulations applicable to personal data and in particular the GDPR.

Purposes of processing, legal bases and Personal Data processed

Didomi takes care to collect and process Personal Data that is relevant, adequate, not excessive and strictly necessary to achieve the purposes that have been previously determined. Didomi takes all reasonable steps to ensure that your data is accurate, complete and, if necessary, kept up to date.

In the table below, you will find the purposes of Processing for which Didomi processes your Personal Data, the categories of Personal Data processed for these activities and the legal basis used to enable said Processing.

For clarification purposes, please note that :

- The "Purposes of Processing" column indicates the purpose(s) pursued by the Processing,

- The "Legal basis for processing" column indicates the purpose for which we may use your Personal Data. For information purposes and a better understanding of the legal basis for processing, we invite you to consult the [CNIL website](#).
- The column "Categories of Personal Data Processed" indicates the types of Data we process in the context of the corresponding Processing purpose, for example: identity, family, economic or financial situation, banking data, connection data, location data, etc.

Purposes of Processing	Legal basis for processing	Categories of Personal Data processed
<p>Purpose 1: Recruit new employees to meet Didomi's needs.</p> <p><i>Sub-purpose 1:</i> Collect CVs and cover letters to select candidates - reception of data and storage of these documents.</p> <p><i>Sub-purpose 2:</i> Manage the interview process</p> <p><i>Sub-purpose 3:</i> Assess Candidates' skills</p> <p><i>Sub-purpose 4:</i> Respond to Candidates' applications</p>	Execution of pre-contractual measures - formalizing and executing the employment contract	<ul style="list-style-type: none"> • Identification details (last name, first name, gender, nationality) • Contact details (telephone number, e-mail address) • Age • Professional experience • Diplomas • CV, cover letter • Languages spoken • Data on criminal convictions or offences committed
Purpose 2: Build a CV database	Consent of the person concerned	<ul style="list-style-type: none"> • CV

As you can see from the table above, Didomi processes certain sensitive data such as data on criminal convictions or offences committed. This data is processed as part of the background checks that may be carried out and part of the recruitment process. This data is subject to a higher level of security, it is only consulted and not stored and is only accessible to a limited number of people internally.

Compulsory collection of Personal Data

The collection of your Personal Data is mandatory in order for your application to be considered. As such, the fields of the Personal Data collection forms used by Didomi which are marked with an asterisk must be completed in order for the application to be taken into consideration. If you do not complete the mandatory information requested, your application cannot be submitted to Didomi.

Retention periods for Personal Data

Your Personal Data is kept by Didomi for the duration of the recruitment process.

If you give your consent, your CV will be kept by Didomi for a period of two years from the date of your last contact with Didomi and will then be deleted.

Categories of recipients of your Personal Data

Your Personal Data is only accessible internally by authorised staff who have been trained in the protection of your Personal Data and are subject to legal or contractual confidentiality undertakings.

Didomi may in particular give access to your Personal Data to certain Processors when this is necessary for the purposes mentioned above in the section "Purposes of processing, legal bases and categories of Personal Data processed".

Didomi uses the following Processors for these purposes:

- Our Processor providing the ATS tool (Applicant Tracking System), which gives us a single platform for sorting applications (viewing CVs), adding comments on candidates, scheduling interviews, etc,
- Our Processor providing a recruitment simplification tool and hosting our employer showcase page with a description of our company, our teams and our job offers,
- Our Processor providing the platform for publishing our internship and apprenticeship offers, which is accessible to students of certain schools in France,
- Our Processors providing job search engines on which candidates can apply,
- Our Processor providing a professional social network on which candidates can apply for job offers,
- Our Processor which allows us to carry out background checks,
- Our Processor providing a tool for electronically signing documents,
- Our Processor providing a suite of cloud computing and groupware productivity tools and software.

Transfers of Personal Data outside the EEA

As part of the contracts concluded between Didomi and its Processors for the implementation of the processing purposes indicated in the section "Processing purposes, legal bases and categories of Personal Data processed", your Personal Data may be transferred outside the European Economic Area. In the event of the transfer of your Personal Data, Didomi ensures that its Processors implement organisational and technical measures to ensure an adequate level of protection for your data (in particular by implementing Standard Contractual Clauses approved by the European Commission). For any information relating to the measures implemented in connection with transfers, please write to dpo@didomi.io.

Your rights regarding your Personal Data

In accordance with the applicable legislation on the protection of Personal Data, you have a number of rights concerning the collection and processing of your personal data, namely :

- **The right to be informed:** You have the right to be informed in a concise, transparent, comprehensible and easily accessible manner of how your Personal Data is processed.
- **The right of access:** You have the right to obtain (i) confirmation as to whether or not Personal Data concerning you are being processed and, where they are, to obtain (ii) access to and a copy of such data.
- **The right of rectification:** You have the right to obtain the rectification of Personal Data concerning you that are inaccurate. You also have the right to have incomplete Personal Data completed, including by providing an additional declaration.
- **The right to erasure:** In certain cases, you have the right to obtain the deletion of your Personal Data. This right is not, however, an absolute right and Didomi may have legal or legitimate reasons for retaining such data.
- **The right to limit processing:** In certain cases, you have the right to obtain the limitation of the processing of your Personal Data.
- **The right to portability:** You have the right to receive the Personal Data concerning you that you have provided to Didomi, in a structured, commonly used and machine-readable format, and you have the right to transmit this data to another data controller without Didomi hindering this. This right only applies where the processing of your Personal Data is based on your consent or on the performance of a contract and where said processing is carried out using automated processes.
- **The right to object:** You have the right to object at any time, for reasons relating to your particular situation, to the processing of Personal Data concerning you when said processing is based on Didomi's legitimate interests. Didomi may, however, invoke legitimate and compelling reasons requiring the continuation of the processing.
- **The right to lodge a complaint with a supervisory authority:** You have the right to contact the CNIL in order to lodge a complaint regarding Didomi's Personal Data protection practices.
- **The right to give instructions concerning the use of data after death:** You have the right to give Didomi instructions concerning the use of your Personal Data after your death.

These rights may be exercised directly with Didomi's DPO by e-mail to dpo@didomi.io or by post to the following address:

DIDOMI SAS
For the attention of the DPO - Data Protection Officer

137 Boulevard de Sébastopol 75002 PARIS

Contact details for our Data Protection Officer

If you have any questions about the collection and processing of your data by Didomi, you can contact our Data Protection Officer by email at dpo@didomi.io.