

Applicant Privacy Policy

How useful is this Policy?

Like the protection of our employees, the confidentiality of the personal data of applicants for positions within our organization is a priority for us.

The Privacy Policy specifically reflects **our commitment to enforce compliance with applicable data protection rules** and, in particular, those of the General Data Protection Regulation ("GDPR").

The purpose of the Privacy Policy is to inform you about how and why we process your data when you **apply for a position with us**.

This Policy applies only to processing that we do **ourselves** and not to processing that may be done by **external recruiters** to assist us in selecting candidates.

If you would like more information about the processing of external recruiters, we invite you to contact them **directly**.

Who is this policy for?

The Privacy Policy is addressed to **you**, during the **recruitment process** (e.g. application to an offer, unsolicited application, recruitment via an external firm, etc.) for employment with us, regardless of the duration or nature of the proposed contract (e.g. salaried position, temporary worker, trainee, etc.).

Why do we process your data and on what basis?

As a recruiter, we necessarily need to process your data in order to manage **recruitment** (e.g. interviews, processing of applications, salary negotiations, etc.), any **travel** that may take place in the context of such recruitment and **security of our premises**.

Processing is carried out on the basis of **discussions** we have with you during the recruitment process and our **legitimate interest** to recruit and select candidates.

We undertake to process your data only for **the purposes and on the grounds** set out above.

What data do we process and for how long?

We have summarized below the **categories of personal data** that we collect directly from you or through **external recruiters**, and their **respective retention periods**.

- **Personal, professional and contact information** (e.g. last name, first name, date of birth, nationality, email address, telephone number, etc.) retained for the duration of the recruitment process.
- **Personal and professional data** (e.g. degrees, certificates, age, marital status, driver's license, etc.) for the duration of the recruitment process.
- **Economic and financial data** (e.g. salaries, bonuses, etc.) throughout the recruitment process.

More generally, we will keep your **CV** for a maximum of **2 years** after your application, unless you give us an instruction to the contrary at dpo@homeexchange.com.

Upon expiration of the retention periods summarized above, we **delete** all of your personal data to ensure your privacy for future years.

The deletion of your personal data is **irreversible** and we will no longer be able to communicate them to you after this period. At most, we can only keep anonymous data for **statistical** purposes.

On the other hand, **if hired**, your data collected during the recruitment process is **automatically** transferred to your **personal file** and becomes subject to the **Employee Privacy Policy**.

In addition, in the event of **litigation**, we are also obliged to retain all of your data for the duration of the processing of the case, even after the expiration of the retention periods described above.

What rights do you have to control the use of your data?

The applicable data protection regulations give you **specific rights** that you can exercise, **at any time** and **free of charge**, to control how we use your data.

- The right to request **access** and **copy** of your personal data as long as this request is not in contradiction with business secrecy, confidentiality, or the secrecy of correspondence.
- Right to **rectify** personal data that are incorrect, outdated or incomplete.

- Right to request **deletion** ("right to be forgotten") of your personal data that is not essential for the proper functioning of our services.
- Right to **limitation** of your personal data which allows you to photograph the use of your data in case of dispute about the legitimacy of a processing.
- Right to give **instructions** on what to do with your data in the event of your death either through you, a trusted third party or an estate.

In order for a request to be **processed**, it must be made directly by **you** at dpo@homeexchange.com. Any request that is not made in this way **cannot be processed**.

Requests cannot be made by anyone other than you, and we may ask you for **proof of identity** if there is any doubt about the identity of the requester.

Please note that we can always **refuse** to respond to any **excessive or unfounded** request, especially if it is **repetitive**.

Who can access your data?

We will only share your information with those who are **properly authorized** to use it to provide our services to you. These are primarily our human resources staff, the team recruiting a candidate, and our security staff.

How do we protect your data?

We implement all **technical** and **organizational** means required to guarantee the **security** of your data on a daily basis and, in particular, to fight against any risk of destruction, loss, alteration, or disclosure of your data that would not be authorized (e.g. secure passwords, data encryption, secure servers, training, access control, antivirus, etc.).

Can your data be transferred outside the European Union?

As part of your duties and for human resources management purposes, we may transfer some of your data to our **parent company located outside the European Union**.

Of course, we assure you that we take great care to provide all **appropriate and legal safeguards** necessary to ensure the confidentiality and protection of your personal data for the duration of the processing that requires the transfer of personal data outside the European Union

Who can you contact for more information?

Our **Data Protection Officer** (“DPO”) is always available to explain in more detail how we process your data and to answer your questions on the subject at dpo@homeexchange.com.

How can you contact the CNIL?

You may at any time contact the French data protection supervisory authority (the "Commission nationale de l'informatique et des libertés" or "CNIL") at the following address CNIL Complaints Department, 3 place de Fontenoy - TSA 80751, 75334 Paris Cedex 07 or by phone at +33(0)1.53.73.22.22.

Can the Policy be changed?

We may change our Privacy Policy **at any time** to adapt it to new **legal requirements** and to **new processing operations** that we may implement in the future. You will of course be informed of any changes to this Policy.

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