

Privacy Notice for Recruitment

Last updated 03/12/2019

Sidetrade SA and/or its affiliated companies (“we”, “us”) are committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to in this document) sets out the basis on which the personal data collected from you, or that you provide to us, will be processed by us in connection with our recruitment processes. Please read the following document carefully, to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (“GDPR”) the Data Controller is **Sidetrade SA and/or one of its affiliated companies**.

We use Workable, an online application provided by Workable Software Limited, to assist with our recruitment process. We use Workable to process personal information as a data processor on our behalf. Workable is only entitled to process your personal data in accordance with our instructions.

Where you apply for a job opening posted by us, these Privacy Notice provisions will apply to our processing of your personal information.

We reserve the right to modify this Privacy Notice from time to time without notice. Please check this page regularly to keep up to date.

INFORMATION WE COLLECT FROM YOU

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, we process personal details such as name, email address, address, date of birth qualifications, experience, information relating to your employment history, skills and experience that you provide to us.
- If you contact us, we may keep a record of that correspondence.
- Details of all actions that you carry out through the use of the Services.
- Details of your visits to Workable’s website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Workable’s website and the resources that you access.

INFORMATION WE COLLECT FROM OTHER SOURCES

Workable provides us with the facility to link the data you provide to us, with other publicly available information about you that you have published on the Internet - this may include sources such as LinkedIn and other social media profiles.

Workable’s technology enables us to search various databases, which may include your personal data, to find possible candidates to fill our job openings. Where we find you in this way we will obtain your personal data from these sources.

Uses Made of Your Information

LAWFUL BASIS FOR PROCESSING

We rely on legitimate interest as the lawful basis on which we collect and use your personal data. Our legitimate interests are the recruitment of staff for our business.

PURPOSES OF PROCESSING

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill our job openings.
- To help Workable improve their services.

AUTOMATED DECISION MAKING/PROFILING

We may use Workable's technology to select appropriate candidates for us to consider based on criteria we have identified. The process of finding suitable candidates is automatic, however, any decision as to who we will engage to fill the job opening will be made by our staff.

How we Store Your Personal Data

SECURITY

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to view it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

WHERE WE STORE YOUR PERSONAL DATA

Sidetrade is an international company with operations in different countries in Europe and has developed global data security practices designed to ensure that your personal information is

appropriately protected. Please note that personal information may be transferred, accessed and stored globally as necessary for the uses and disclosures stated above in accordance with this policy.

The data that we collect from you and process may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing.

In particular, your data may be accessible to i) Workable's staff in the USA or ii) may be stored by Workable's hosting service provider on servers in the USA as well as in the EU or iii) others Sidetrade affiliates, partners and suppliers located inside and outside Europe. The USA does not have the same data protection laws as the United Kingdom and EEA. A Data Processor Agreement has been signed between Sidetrade and its overseas group companies, and between Sidetrade and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

If you would like further information please contact us (see 'Contact' below). We will not otherwise transfer your personal data outside of the United Kingdom OR EEA.

HOW LONG WE KEEP YOUR PERSONAL DATA

We will hold all the data for 24 months.

Your personal information will be deleted on one of the following occurrences:

- deletion of your personal information by you or
- receipt of a written request by you to us.

YOUR RIGHTS

Under the [General Data Protection Regulation](#) you have a number of important rights. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- request the erasure of personal data concerning you in certain situations
- request access to the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

If you would like to exercise any of those rights, please:

- contact us using our Contact details below,
- let us have enough information to identify you,
- let us have proof of your identity and address, and
- let us know the information to which your request relates.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority in the EU member state where you live, work or where an alleged infringement of applicable data protection law occurred,.

All questions, comments and requests regarding this Privacy Notice should be addressed to privacy@sidetrade.com

Sidetrade
Human Resources
Department 114, rue Gallieni
92100 Boulogne- Billancourt
France