

PERSONAL DATA PROTECTION POLICY FOR JOB APPLICANTS

May 2018

At August Debouzy, we take the protection of your privacy and personal data very seriously.

This is why we are committed to implementing appropriate measures to ensure the protection, confidentiality and security of your personal data and to only processing and using such data in compliance with applicable laws, and in particular European Regulation 2016/679 of April 27th, 2016 (hereinafter the “General Data Protection Regulation”), Act No. 78-17 of 6 January 1978 (the “French Data Protection Act”) and any other law or regulation that may supplement or replace it (hereinafter “Applicable Legislation”).

The purpose of this personal data protection policy (hereinafter the “Policy”) is to give you information on how we process your data and the commitments made by August Debouzy to ensure compliance with your personal data.

1. What is the scope of this Policy?

This Policy applies to all processing of personal data implemented by August & Debouzy & Associés law firm (hereinafter “August Debouzy”, “we” or “us”), as the controller under Applicable Legislation of the personal data of applicants submitting job applications spontaneously or in response to a job offer (hereinafter the “Applicant(s)” or “you”).

2. What data is collected, for what purposes and on what legal grounds?

➤ Data collected:

We collect the following personal data:

- identification and contact information (surname, name, email address, phone number);
- resume and educational and professional curriculum;
- cover letter;
- centers of interest;
- any information we collect during interviews in connection with the recruitment process;
- any information you voluntarily provide to us in the context of the recruitment process.

Such information is collected from you directly, or is provided to us by a third party, including recruitment/search firms (job offer websites, recruitment firms, etc.) or the references given to us during the recruitment process.

➤ The purposes for which we use your data:

August Debouzy processes the information collected directly from you or from third parties for the purposes of:

- examining your application to work with us, to let us decide whether your profile corresponds to the position to which you have applied or any other position at August Debouzy;
- more generally, to manage the recruitment process, including to contact you and set up interviews;
- contacting you in the future, provided you do not object, if opportunities arise at August Debouzy that could correspond to you or interest you.

➤ The legal grounds on which we process your data:

Our processing is based:

- in part, **on the need to perform precontractual measures**, in other words to examine your application for a position at August Debouzy. We need to process your data to determine whether we wish to enter into an employment contract or other appropriate contract with you;



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- in part, **on the legitimate interest of August Debouzy**, when your application file is kept by August Debouzy to be able to get in touch with you again in case future opportunities arise. In effect, this processing (based on the storage of your file) contributes to the optimization of the recruitment process at August Debouzy and benefits both you and us without adversely affecting your interests or your fundamental rights and freedoms.

3. How long do we keep your data?

We keep your personal data as long as necessary to achieve the purposes for which they were collected and processed pursuant to section 2.

If your application is successful and you join August Debouzy, your data will be kept during your entire relationship with August Debouzy (the duration of your employment contract or other contract) and during the applicable statute of limitation period, after which time your data will be deleted (in France, 5 years after your departure).

Conversely, if your application is unsuccessful, your data will be kept during a period of 24 months, following which they will be deleted unless you wish them to be kept.

4. With whom do we share your data? Who can access your data?

Your personal data can be accessed internally only by the departments having a need to access such data for the purposes indicated in section 2, namely: the human resources department and the internal department in which you applied for a position.

We may share some of your personal data, to the extent necessary for the purposes indicated in section 2, with the following entity:

- August Debouzy Iran

Your personal data may be shared with our Iran desk as necessary to ensure a coherent group recruitment policy, and to permit you to work with or at our Iran desk. August Debouzy implements the necessary measures to secure any such transfer of your personal data.

Your personal data can also be shared with:

- public authorities, agencies or other bodies to which we are required to disclose some of your personal data in accordance with applicable laws;
- French or foreign public authorities, agencies or other bodies in response to legal or administrative proceedings of any nature, or enforcement measures sought by the competent authorities.

We may also rely on service providers acting as processors within the meaning of Applicable Legislation to perform services in relation with some of the processing activities implemented using your personal data. In particular, such service providers provide us with hosting, storage, data processing, database management, IT or other related services. These service providers act only on instructions from August Debouzy and will only have access to your personal data if necessary for them to perform their services and will be under the same security and confidentiality obligations as August Debouzy.

Your personal data are stored within the European Union and, subject to the foregoing, will not be subject to any transfer outside the European Union.

5. How do we ensure the protection and security of your personal data?

The security of personal data is one of our priorities at August Debouzy. August Debouzy agrees to take all reasonable and appropriate measures, on a technical and organizational level, to prevent any disclosure, use, alteration, accidental loss or destruction of the personal data supplied by an Applicant.

6. What are your rights?

In accordance with Applicable Legislation, you have the following rights in relation to your personal data:

- **a right of information:** you have the right to obtain clear, transparent, intelligible and easily accessible information about the way in which we use your personal data and about your rights. This Policy is intended to provide you with that information.
- **a right of access:** you have the right to access the personal data we hold about you (provided your access request is not manifestly unfounded or excessive, in particular because of its repetitive nature), and to obtain a copy thereof. If you wish to access the data we hold concerning you, please contact us at the address provided below.
- **a right of rectification:** you have the right to obtain the rectification of any personal data concerning you that is inaccurate or out-of-date and/or to obtain the completion of any incomplete personal data (provided your access request is not manifestly unfounded or excessive, in particular because of its repetitive nature). If you wish to make changes to your personal data, please contact us at the address provided below.
- **a right to erasure:** in some cases, you have the right to obtain the erasure or deletion of your personal data. This is not an absolute right, as we may have legal or legitimate grounds for keeping your personal data. If you wish us to erase your data, please contact us at the address provided below.
- **a right to restriction of processing:** this right means that our processing of data concerning you is restricted, with the result that while we may keep your data, we may not use or process such data. This right applies in specific circumstances, namely:
 - in case the accuracy of personal data is contested by the data subject (i.e. you), for a period enabling August Debozy to verify the accuracy of the personal data;
 - in case the processing is unlawful and the data subject (i.e. you), objects to their erasure and requests the restriction of their use instead;
 - in case August Debozy no longer needs the personal data for processing purposes, but they are required by the data subject for the establishment, defense or exercise of legal claims;
 - if the data subject (i.e. you) objects to processing based on the legitimate interests pursued by us, pending the verification as to whether the legitimate grounds pursued by August Debozy override those of the data subject or not.

If you wish to obtain a restriction of processing, please contact us at the address provided below.

- **a right to object to the processing of your personal data when such processing is based on the legitimate interest of August Debozy** (to determine what type of processing is involved, see section 2 of this Policy): you can object at any time to the processing of your personal data on grounds relating to your particular situation, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or unless such data is required for the establishment, exercise or defense of legal claims. If you wish to exercise your right to object to processing or obtain more information on how to exercise it, please contact us at the address provided below.
- **a right to data portability:** you have the right to receive personal data concerning you, which you have provided to us and that are present on our database, in a structured, commonly used and machine-readable format. This only applies to data you have provided to us, directly or indirectly, and only when the processing is based on your consent or on performance of a contract and is carried out by automated means. We invite you to view the list of legal grounds we rely on for the processing of personal data (see section 2) to determine whether our processing is based on a contract or on consent. For more information, please contact us at the address provided below.



- **a right to give us specific instructions on what to do with your personal data after your death.**
- **a right to lodge a complaint with a supervisory authority:** you have the right to lodge a complaint with the data protection authority in your country (in France, the CNIL) about our privacy and personal data protection practices. However, we invite you to contact us at the address below before lodging a complaint with the competent data protection authority.

7. Changes to Policy

If we make any significant changes, additions and/or deletions to any part of this Policy, we will make every possible effort to inform you of such changes, additions or deletions prior to their becoming effective, by sending you an email to the address you have given us.

8. How to contact us?

If you have any questions or observations about the way in which we process and use your personal data, or if you wish to exercise any of your rights indicated above, please send us an email to: gdpr@august-debouzy.com or write to us at: General Management, GDPR, August Debouzy, 6-8 avenue de Messine 75008 Paris.