

# Privacy Policy

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# Recruitment

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*Last update: 23 January 2020*

### **Preamble**

Groupe La Française and the companies within it (referred to collectively in this document as “the Group”) are committed to protecting your privacy and the confidentiality of your data and to taking care to protect your personal data (hereinafter “Personal Data”). Please read the following information carefully. It tells you about how we collect and use your Personal Data and the options available to you in connection with its use.

This Privacy Policy applies to the processing of Personal Data of applicants for a position in one of the Group's companies.

The Personal Data of applicants is collected by internet, by email or via recruitment agencies or forums.

The Data Controller is the employer entity, a member of the Group, identified in the job offer (“the Company”, “we”, “us” or “our”). This may be one of the following entities : Groupe La Française, La Française AM Finance Services, La Française Asset Management, La Française Real Estate Managers, La Française Real Estate Partners, La Française Investment Solutions, La Française Global Investments, New Alpha Asset Management.

This list of companies is subject to change. You can see the entities comprising the Group here: <https://www.la-francaise.com/fr/mentions-legales/>

### **1. What data is collected and how is it used?**

When you apply for a job offer on the Website, you will be required to communicate various Personal Data about you to the Company, namely:

First of all:

- Your first name and surname;
- Your email address;
- Your telephone number;
- The information in your cover letter and your CV;

Secondly, based on the recruitment process, the Company may collect:

- Any information from your interviews;
- Any information from third parties (verification of qualifications and references).

At the end of the process, if you are a finalist candidate and after you have verbally accepted the hiring terms and conditions, the Company may ask you:

- - Your date of birth;
- - Your place of birth;
- - Your maiden name;
- - Your social security number;
- - Your address.

The Company collects this Personal Data in order to:

- Manage recruitment efforts. This includes making decisions about your hiring, informing you of this decision and meeting the Company's legal obligations to fight money laundering and terrorist financing;
- Create a CV-library to manage talents and track applications;
- If you are hired, establish your employment contract and the "Déclaration Unique d'Embauche" (single declaration of employment).

This processing is carried out on the basis of the legitimate interest of the Company, namely the development thereof, as well as respect for its legal obligations to fight money laundering and terrorist financing.

The Company believes that the risk related to the Personal Data that it processes on the basis of its legitimate interest is not excessive or too intrusive. In particular, the Company has implemented measures to protect your rights by applying appropriate retention periods and ensuring appropriate security controls.

If you choose not to provide the Personal Data that the Company requests, we may not be able to start the recruitment process and give a favourable response to your request.

## 2. How long is my personal data stored?

**Non-selected applicants:** in the event of a negative outcome to an application, the Company will inform you if it wishes to retain your recruitment file. However, you can object to this and request the destruction of the Personal Data collected on this occasion.

The Company will automatically delete your file 2 years after the last contact with you.

**Hired applicants:** for more information how the personal data of employees, work-study students and trainees in the Group are processed, the internal privacy policy for the Company's staff will be given to you so that you become familiar with it.

### 3. How is my personal data shared?

In general, your personal data is shared within Groupe La Française and with the companies supporting Groupe La Française as part of the recruitment process.

#### **Specifically, for transfers outside the European Union/EEA**

When the processing of your Personal Data involves a transfer to third countries outside the European Union/EEA, the transfer is to countries listed by the European Commission as providing sufficient protection for data and/or is covered by appropriate guarantees based on standard contract clauses published by the European Commission and/or recognised certification.

When sharing of Personal Data involves transfer to the United States, recipients will have Privacy Shield certification.

Unless otherwise provided in this Privacy Policy or with your prior permission, we will not sell, market or lend Data.

For more information about the transfer of Personal Data to third countries outside the European Union/ EEA, please refer to the section below "WHAT TO DO IF YOU HAVE FURTHER QUESTIONS ABOUT THE PRIVACY AND COOKIES POLICY".

#### **The Group's companies**

The Company may share your Personal Data with companies in the Group. For further information on the companies in the Group, please go to <https://www.la-francaise.com/fr/mentions-legales/>

#### **Service Providers**

As part of the conduct of our business, the Company may transfer your Personal Data to service providers outside the Group. These service providers use your Personal Data only to enable the Company to manage our recruitment process. For example, these service providers may be IT providers or providers assisting us with data management. We disclose to our service providers only the Personal Data they need to provide their services and we work with them to ensure that your Personal Data is respected and protected.

We never disclose any personal Data to these companies for their own marketing or commercial needs.

#### **Legal Obligations**

The Company may, however, be required to disclose Personal Data in different situations:

- to a regulatory authority, such as the tax authorities or CNIL (the French data protection authority), etc., and/or a court (in response to a judgement, a court order or injunction) on request or if the law requires us to do so, or in order to

protect our interests, our property and/or our security and/or those of a third party.

- to companies assisting in the fight against fraud and investigating fraud.
- under the procedures of the fight against money laundering and terrorist financing.

Although the Company does not sell, market or lend your Personal Data to other companies in the normal course of its business, the Company may, however, disclose your Personal Data to another company in the event of any restructuring of the Group's companies (acquisition, merger, partial transfer of assets or other such transaction). This disclosure will then be subject to the Privacy Policy in force.

#### **4. How do i know if my personal data is kept safe?**

The Company has a variety of security measures to prevent the loss, misappropriation or misuse of Personal Data that you provide to us. In order to guarantee the security of the data you disclose online during transmission, the Company uses encryption, authentication and flow analysis and we carry out security audits on the hosting environments.

#### **5. Your rights regarding your personal data**

Under the legal and regulatory framework applicable to the protection of Personal Data and privacy, you have a right to access, rectify, object to or erase your Personal Data or limit its processing, as well as a right to its portability, unless provided otherwise by law.

These rights are not absolute and each of these rights is subject to certain conditions in accordance with French law (in particular the French Data Protection Act No. 78-17 of 6 January 1978, as amended, but also any legislation applicable to the Group's banking and finance), the recommendations of the CNIL and the General Data Protection Regulation 2016/679 of 27 April 2016 ("GDPR")

Similarly, if the Company has collected and processed your Personal Data with your consent, you have a right to withdraw your consent at any time. The withdrawal of consent does not affect the legality of processing based on the consent undertaken before it was withdrawn.

You also have a right to give instructions about what should be done with your Personal Data after your death.

You may write to Groupe La Française about this at any time, at the following address:

**Groupe La Française - Data Protection Officer**

128, boulevard Raspail - 75006 PARIS, France

or by email to [dpo@la-francaise.com](mailto:dpo@la-francaise.com).

Before evaluating your request, we may ask you for additional information to identify you. If you do not provide the requested information and we are therefore unable to identify you, the Company may refuse to respond to your request.

Finally, you have a right to complain about the collection and use of your Personal Data to your local data protection authority (for France, this is the CNIL: [www.cnil.fr](http://www.cnil.fr)).

## 6. What to do if you have further questions about the privacy and cookies policy?

If you have any questions or concerns about this Privacy Policy, you can contact:

- the Data Protection Officer by email at [dpo@la-francaise.com](mailto:dpo@la-francaise.com)
- or by sending a letter to:

**Groupe La Française - Data Protection Officer**

128, boulevard Raspail

75006 PARIS, France.

## 7. What legislation applies to this privacy policy?

This Privacy Policy is governed by French law, in particular the French Data Protection Act No. 78-17 of 6 January 1978, as amended and the recommendations of the CNIL, as well as the GDPR. Please note that this policy may change in the light of regulatory developments or changes in our recruitment process.