

# PRIVACY POLICY FOR CANDIDATES' PERSONAL DATA

**APRIL 2025 VERSION** 

# WHAT IS THE PURPOSE OF OUR PRIVACY POLICY?

ASOBO STUDIO considers the confidentiality of personal data to be a guarantee of seriousness and trust.

As such, our Personal Data Privacy Policy precisely reflects our desire to ensure that ASOBO STUDIO complies with the rules applicable to the protection of personal data and, more specifically, those of the General Data Protection Regulation ("GDPR").

In particular, our Privacy Policy aims to inform you about how and why we process your personal data in connection with the **services** we provide to you.

#### WHO CAN BENEFIT FROM OUR PRIVACY POLICY?

The Privacy Policy applies to **you as a** candidate for a position with ASOBO STUDIO, throughout the entire **recruitment process** (e.g. application to an offer, unsolicited application, recruitment via an external firm, etc.), regardless of the duration or nature of the proposed contract (e.g. salaried position, temporary worker, trainee, etc.).

### WHY DO WE PROCESS YOUR PERSONAL 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 occur in connection with recruitment and the **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** in recruiting and selecting candidates.

Please note that we use video protection cameras on the basis of our legitimate interest in guaranteeing the safety of our employees and premises.



# **HOW DID WE OBTAIN YOUR PERSONAL DATA?**

Your data is collected **directly from you** via your application and CV, and we undertake to process your data only for the **purposes described above**.

We may also collect your personal data indirectly:

- From recruitment agencies if you have previously consented to this with them.
- Through professional data enrichment tools. These tools allow us to access contact information (email addresses) associated with public profiles on professional social networks such as LinkedIn.

If you are contacted as a result of this indirect collection, you will be informed of the origin of your data and your rights regarding it. You have the right to object to this processing, which you can exercise at any time.

#### WHAT PERSONAL DATA DO WE PROCESS AND FOR HOW LONG?

- any personal and professional identification data provided in the candidate's CV and covering letter (e.g. surname, first name, date of birth, nationality, etc.) retained for the duration of the recruitment process and for a maximum of 2 years after your application.
- all details provided in the candidate's CV and cover letter (e.g. e-mail address, telephone number, Linkedin link, etc.) retained for the duration of the recruitment process and for a maximum of 2 years after your application.
- any data relating to personal and professional life provided in the candidate's CV and cover letter (e.g. diplomas, hobbies, certificates, age, marital status, driving license, etc.) kept for the duration of the recruitment process and for a maximum of 2 years after your application.
- all economic and financial data (e.g. salaries, bonuses, etc.) provided during job interviews are kept for the duration of the recruitment process and for a maximum of 2 years after your application.
- any specific data (e.g. residence permit, etc.) provided by the applicant as part of the recruitment process is kept until the end of the employment relationship in the case of recruitment, and is deleted after the recruitment process in the case of refusal.
- any specific relevant and required data (e.g. disability status) provided in the candidate's CV and cover letter retained for the duration of the recruitment process and deleted after the recruitment process has ended.
- any identity documents (e.g. passport or ID card) provided as part of the recruitment process are deleted once the candidate has or has not been recruited.



- **Video protection images** collected by our video protection cameras and stored for a maximum of one month.
- if you have applied for a job via our website, connection data (e.g. IP address and logs) will be kept for a maximum of 12 months.

Once the applicable retention periods have expired, the deletion of your personal data is **irreversible** and we will no longer be able to communicate it to you. At most, we can only keep anonymous data for **statistical purposes**.

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

Please also note that in the event of **litigation**, we are obliged to retain **all** personal data concerning you for the duration of the case, even after the expiry of the retention periods described above.

#### WHAT RIGHTS DO YOU HAVE TO CONTROL THE USE OF YOUR PERSONAL DATA?

The applicable data protection regulations grant you **specific rights** which you can exercise, **at any time** and **free of charge, to** control the use we make of your data.

- Right to access and copy your personal data, provided this request does not conflict with business secrecy, confidentiality or the secrecy of correspondence.
- Right to **rectify** personal data that is incorrect, outdated or incomplete.
- The right to **object to** the processing of your personal data for commercial prospecting purposes.
- The right to request **the deletion** ("right to be forgotten") of personal data that is not essential to the proper functioning of our services.
- The right to **limit the** use of your personal data, which allows you to photograph the use of your data in the event of a dispute over the legitimacy of processing.
- The right to data **portability**, which enables you to recover part of your personal data so that it can be easily stored or transmitted from one information system to another.
- The right to give **instructions** on what to do with your data in the event of your death, either through you or through a trusted third party or beneficiary.

For a request to be taken into **account**, it must be sent directly by **you** to dpo@asobostudio.com. Any request not made in this way **cannot be processed**.

Requests cannot come from anyone other than you. We may therefore ask you to provide **proof of identity** if there is any doubt about the identity of the person making the request.



We will respond to your request as quickly as **possible**, subject to a **maximum of** three months from receipt if the request is technically complex or if we receive many requests at the same time.

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

### WHO CAN ACCESS YOUR PERSONAL DATA?

Your personal data is processed by **our teams for the** sole purpose of managing applications.

#### **HOW DO WE PROTECT YOUR PERSONAL DATA?**

We implement all the **technical** and **organizational means required** to guarantee the **security of** your data on a day-to-day basis and, in particular, to combat any risk of unauthorized destruction, loss, alteration or disclosure of your data (e.g. secure access, antivirus, etc.).

#### CAN YOUR PERSONAL DATA BE TRANSFERRED OUTSIDE THE EUROPEAN UNION?

All personal data processed for recruitment purposes is hosted exclusively within the European Union.

Les données personnelles traitées par dans le cadre de recrutements sont exclusivement hébergées au sein de l'Union européenne.

#### 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 any questions you may have on the subject at the following address: dpo@asobostudio.com.

### **HOW CAN YOU CONTACT THE CNIL?**

The CNIL (short for "Commission Nationale de l'Informatique et des Libertés") is the French Data Protection Authority. It is an independent public body responsible for ensuring compliance with laws related to personal data protection in France.

You may at any time contact 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 telephone at +33 153732222.

#### **CAN THE PRIVACY POLICY BE MODIFIED?**



We may modify 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.

