

Easy Skill's Privacy Policy

Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal Data and on the free movement of such data (called GDPR in this Privacy Policy), came into force on the 25th May 2018.

GDPR has raised the awareness of all the actors in the European Union and their partners throughout the world concerning the numerous issues relating to the management, processing and storage of Personal Data.

This document gives clients, candidates, visitors and, where appropriate, employees information about Easy Skill's policy for processing Personal Data in accordance with GDPR.

This Privacy Policy sets out the measures we take to ensure the security and confidentiality of any Personal Data we hold for you. It also describes the purposes for which we collect and process this information. **We urge you to read this policy carefully.**

Latest update: 25 March 2019

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1. Undertaking and objectives

In this document, we refer to the management, processing, collection, protection and storage of your Personal Data and may also refer to the “processing” of Personal Data in more general terms.

1.1. Easy Skill’s undertaking

Easy Skill undertakes to respect your privacy and to implement appropriate measures to protect your Personal Data and process it in a fair, lawful and transparent manner.

We undertake to do this for our candidates, our clients and the users of our website. We will ensure that the information provided to us or collected by us through diverse channels (written correspondence, including emails; conversations or meetings with our employees or partners; and, communications through our offices throughout the world etc.) is only used for the purposes detailed in this policy.

1.2. The objectives of this Privacy Policy

This Privacy Policy applies to the company Easy Skill, to affiliated companies, associated entities and to third parties (for example, our Data Processors).

It enables us to meet our transparency obligations in accordance with GDPR and national legislation into which GDPR has been transposed.

This Privacy Policy sets out how we collect, process, store and protect your Personal Data:

- when providing our professional services to you and to our clients;
- when you use our web site; and
- in performing all other operations related to our offering and proposals in relation to services, sectors and careers.

This Privacy Policy aims to describe:

- the types of Personal Data that we collect from candidates, employees, prospects or clients;
- the purposes for which that data is collected; and,
- the way in which it is processed.

1.3. Cross-border compliance

Easy Skill’s business activities and its role as a Controller of Personal Data mean that Easy Skill and any of its affiliated entities, including, for example, Easy Skill’s Data Processors, may collect, process and transfer Personal Data outside the European Union. Easy Skill and any affiliated entities shall

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carry out these transfers using tools that guarantee an adequate and suitable level of protection for Personal Data in accordance with GDPR.

2. Collecting your Personal Data

2.1. Our activities

We may request, collect and obtain some of your Personal Data for services offered to you and provided to our clients, and in accordance with our procedures and due diligence processes for checking for potential conflicts of interest (and, depending on the case, during pre-contractual exchanges about the services that we are able to provide).

We may also collect and obtain Personal Data because you have sent it to us (for example, through the contact form on our website), or, in some cases, because other people have provided it to us (for example one of your acquaintances, or one of the Data Processors that we use to carry out our business activities), or because that Personal Data is in the public domain.

2.2. Cookies

We may also directly or indirectly collect and obtain your Personal Data from an analysis of your behaviours while interacting with us or with other persons. For example, in order to improve the quality of your user experience when you use our website and to provide you with a smoothly functioning web service, we (or our Data Processors in some cases), may use cookies (small text files stored in the user's browser) and web beacons to collect Personal Data.

Information and further details of how we use cookies and other tracking software tools and of the way in which you can control them are set out in our cookie charter, which is available when you connect to our website <https://www.easy-skill.com/>.

2.3. Types of data

The Personal Data that we collect or obtain directly or indirectly while providing our professional services to you and to our clients and while you are using our websites and, more generally, during any other operation related to our services and sector or career offering, may notably include:

- Your last name;
- Your first name;
- Your age;
- Your date and place of birth;
- Your sex;
- Your email address;
- Your passport number;
- Your driving licence number;
- Your airline loyalty card number;
- Data concerning your health insurance;
- Your social security number;
- Your IP address;

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- Your Skype address;
- Your telephone number;
- Your home address
- Your country of residence;
- Your fitness for work;
- Your current income;
- Your professional situation and details about your job, and your academic education (for example, the company you work for, the job you are currently doing and your schooling);
- Your lifestyle and your social situation (for example, your leisure activities);
- Your marital status and details about your family (for example, how many people you are responsible for);
- Photographs of you and films featuring you;
- Your PPE clothing sizes and shoe size;
- Data concerning your health (vaccines, serology etc.),
- Data concerning your religion (if freely volunteered in a candidate CV)
- Official copies of your police or criminal record; and,
- Data concerning your tax situation (tax rate, your taxable income etc).

3. Using your Personal Data

3.1. Processing purposes

We may hold, use and divulge your Personal Data, primarily for the following purposes:

1. to provide you with our services;
2. to maintain a professional relationship with you as a website user, a client or a candidate;
3. to allow us to send your CV to apply for general or specific positions;
4. to establish whether your information corresponds to job vacancies; to help us to find a job that best corresponds to your expectations and to send your Personal Data to clients in response to job offers;
5. to keep your information and inform you of any future job positions, other than the specific position you contacted us about;
6. to reply to any requests for information;

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7. to carry out prospecting and the direct marketing of products and services and to send you news and information about sector events, promotions, competitions, reports and other information;
8. to meet our contractual obligations to our clients;
9. to communicate Personal Data to regulatory bodies or bodies responsible for law enforcement (if we are requested or authorised to do so);
10. for our website, which uses a web service with a recording service that may record the number of mouse clicks, mouse movements, the pages looked at and any text entered in the website's forms. The data collected by this service is used to improve users' experience of our website. Information collected is stored and used to produce aggregated reports and statistics and is not shared with anyone.
11. In order to provide you with personalised content on our web site, the most relevant communications in our emails, and a service that is adapted to your needs:
 - We follow and record your use of our website and your interactions with our website and our emails.
 - We use a Data Processor, to help us to save, store and analyse this information in order to determine how to offer the best recruitment experience possible.
 - We ensure that no element allowing you to be personally identified is saved in this database, and, we do not share this information with any other company or affiliate other than the Data Processor that we have chosen.

3.2. Actively consenting

In compliance with GDPR, users are specifically requested to actively and unambiguously consent to all aspects of Personal Data processing described in this Privacy Policy by ticking a box.

3.3. Email Newsletter

If you agree to allow us to use your email address for marketing purposes, we will regularly send you an information letter or newsletter to draw your attention to Easy skill's business activities and services.

You can change this use of your email address or unsubscribe at any time, by opening the newsletter and clicking on the link at the end of it.

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4. Communicating your Personal Data

Personal data is liable to be communicated:

- to the group's employees;
- to clients within the context of a job search;
- to any administrative or legal authority; and,
- to Data Processors (to premises where servers are located or to data centres etc.) The Data Processors' obligations and the service levels are governed by a contractual agreement which states that the Data Processor may only act on Easy Skill's instructions. The contractual agreement sets out the Data Processors' obligations and establishes the terms of security and privacy as well as the obligations and measures to be taken to ensure compliance with the principles set out in GDPR.

5. Security of your Personal Data

We use a package of organisational and technical measures to guarantee the protection of your Personal Data.

These measures notably include:

- raising the awareness of our employees and training them to ensure that they know our obligations for protecting privacy when processing Personal Data;
- administrative and technical checks and controls to ensure we only gain access to Personal Data that we need;
- technological security measures, notably including firewalls, authentication, encrypted communication, and antivirus software;
- physical security measures on our premises, notably access badges and recent alarm devices; and
- a contractual clause governing the processing of Personal Data that is signed by us and by our Data Processors before we start working together.

6. Duration of Personal Data storage

You decide how long we keep your Personal Data. You can exercise your legal rights in relation to data protection at any time (see paragraph 9, 'Your rights').

In general, we keep your data as long as is necessary for the provision of our services and our assistance.

We may store some of your information after our contractual relationship has ended, even though we no longer need it to provide our services, if it is reasonably necessary for us to do so or if we are

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required to do so to fulfil our legal and regulatory obligations, to settle disputes, to prevent fraud or abuses or to apply our terms and conditions.

7. Authorisation and the legal basis for processing your Personal Data

7.1. Authorisation

You authorise us to process your Personal Data immediately by ticking the box that explicitly authorises us to process the Personal Data that you provide us with (see paragraph 4.2 “Actively consenting”)

7.2. Legal basis

In accordance with GDPR, the principal purposes for processing the Personal Data of clients and candidates are set out above.

- Processing Personal Data is necessary for us to establish or execute a contract.
In order to fulfil our obligations when providing you with a service, or making the necessary provisions to establish a contract with you at your request, it is necessary for us to collect and process your Personal Data.
- Processing Personal Data is necessary for us to be able to fulfil our legal obligations.
We may need to process your Personal Data to meet certain legal requirements. We may also be required by law to divulge your Personal Data to a regulatory body or to a body responsible for law enforcement.
- Processing Personal Data is necessary for the purposes of legitimate interests.
We, the Data Controller, or a third party, shall process your Personal Data for the purposes of the legitimate interests of the Data Controller or of a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of Personal Data. Our legitimate interests include: replying to your requests for information and to those of a third party; optimising our website and optimising our clients’ experience; providing information about our products and services; and, ensuring our business activities are carried out in an appropriate and efficient manner.

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8. Your rights

In accordance with French Law no. 78-17 of the 6th January 1978 concerning information technology, files and freedom, modified by Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of Personal Data, you have several rights concerning the management of your data.

8.1. The right to access

You have the right to request confirmation that we are processing your Personal Data and the right to a copy of the Personal Data that we are storing concerning you.

8.2. The right to correct

You have the right to ask us to update any Personal Data held concerning you and to ask us to correct any incorrect or incomplete Personal Data.

8.3. The right to erase

You have the right to ask us to erase the Personal Data that we hold concerning you, or to ask us to limit the use made of that data.

8.4. The right to object and to withdraw consent

You can object to the processing of your Personal Data and may withdraw the consent you have given that authorises us to process your Personal Data (providing any such processing is subject to consent).

Nonetheless, please note that we may get back in touch following publication on your side of your CV and / or profile on a professional social network or jobboard. Under these circumstances, we would ask you once again to accept or decline our privacy policy.

8.5. The right of portability

In accordance with the applicable law or regulations, you have the right to receive a copy of the Personal Data you have sent us in a structured and commonly-used form that can be read by a machine, with a view transferring that data to another party (in so far as this processing is subject to consent or a contract).

8.6. The right to restrict processing

You have the right to request that the processing of your Personal Data be suspended pending a verification (for example, if you exercise the right to object, we must check if there are legitimate reasons that justify us continuing to process your Personal).

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8.7. The right to define instructions for the use of Personal Data after death

If you do not provide any instructions, after a certain period of inactivity (see paragraph 7. “Duration of Personal Data storage”) we will erase your Personal Data. Nevertheless, your heirs may exercise rights concerning your Personal Data after your death.

8.8. The right to make a complaint to the CNIL

If you believe that your Personal Data has been processed in a way that constitutes a violation of the law, you may make a complaint to the French data protection body, the Commission Nationale de l’Informatique et des Libertés (CNIL).

8.9. Exercising your rights and obtaining further information

You can find further information on your rights on the CNIL’s website www.cnil.fr
To exercise your rights, or if you have any questions about our use of your Personal Data, you may contact us by email at the following address: contact@easy-skill.com.

You may also exercise your rights by post at the following address:

Easy Skill France
20 B rue Denuzière
69002 Lyon

Following a request, Easy Skill commits to communicating all information concerning the person who made that request as soon as possible, and in any eventuality within one month dating from the date of reception of the request.

9. Privacy Policy updates

The content of this document will be updated periodically and without warning to comply with any new applicable laws and regulations that come into force (notably due to legislative or regulatory developments) and in accordance with changes in the services offered by Easy Skill.

If we make any changes to this Privacy Policy, we will change the review date at the top of the page. The modified version of the Privacy Policy for protecting Personal Data will be applicable from that date on. We therefore urge you to read this Privacy Policy regularly so as to stay informed about how we are protecting your Personal Data.

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