



APPLICANTS' PERSONAL DATA POLICY

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SOLINA GROUP

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## 1. WHAT IS THE PURPOSE OF THIS PRIVACY POLICY ?

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The purpose of this policy is to meet the information obligations of any company belonging to the Solina Group (hereafter the "Company", "us" or "we") under the GDPR (Article 12) and other regulations and to document the rights and obligations of applicants and contacts regarding the processing of their personal data.

The processing of personal data may be managed directly by the Company, any other company of Solina group or by a data processor specifically designated by the Company.

In order to provide the best possible service to candidates (hereinafter referred to as "you"), this policy sets out the terms and conditions under which we process personal data that we have access to during the selection and recruitment process. We may process your data via our internal application processing system.

It is important that you read this policy as by submitting your application you are confirming that you have read, understood and accepted it.

## 2. WHAT TYPE OF DATA DO WE COLLECT ?

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<b><i>Non-technical data</i></b>	Identity and identification data (surname, first name, date of birth, pseudonym) ; Contact details (telephone, address, e-mail, social network accounts, etc.) ; Data relating to professional life (education, career, contact details of current and former employers, professional experience, interests: career interests, travel interests, relocation interests, etc.) ; Photograph (optional) ; Information gathered during the interview and any other information shared.
<b><i>Technical data (if applicable)</i></b>	Any data or logs on a Company technical environment to which the applicants has access

We do not ask candidates to provide us with sensitive data such as: racial or ethnic origin, political opinions, religious beliefs, sex life or orientation, trade union membership, etc.

As this data is not required for the selection and recruitment of candidates, we kindly ask you to limit the information you send us to what is strictly professional and useful for your recruitment. Please ensure that the documents you send us do not contain any sensitive information as described above.

## 3. HOW DO WE COLLECT YOUR DATA ?

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Data can be collected in two possible ways:

- Direct collection of your data: data is communicated directly, for example when you respond to a job application posted on our site or on LinkedIn ;

- Indirect collection of your data: this is performed by a dedicated company, such as headhunters, recruitment websites, or on the occasion of a job fair, etc.

#### 4. WHAT ARE THE PURPOSES AND THE LEGAL BASIS FOR PROCESSING YOUR DATA?

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Purposes	Legal basis
Administration and processing of your data	Legitimate interest
Assessment of suitability for the job	Legitimate interest
Background check	Legitimate interest
Contact to arrange interviews	Legitimate interest
Create a CV-library	Legitimate interest and consent if necessary
Process a resume from a recruiting company	Legitimate interest
Statistics	Legitimate interest

Once the recruitment phase will be completed, the data will be processed for the execution of the contract.

#### 5. ACCESS TO YOUR PERSONAL DATA

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Solina's data recipients :

- Human resources
- Relevant business unit
- Any employee or board member of another company of Solina's group if justified

External data recipients :

- Recruitment companies
- Service providers
- Competent authority
- Any other data Solina's data processor if justified

#### 6. DO WE TRANSFER YOUR DATA OUTSIDE THE EUROPEAN UNION ?

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The company reserves the right to decide whether or not to proceed with cross-border flows of the personal data it collects and processes.

Cross-border data flows between the parent company and its subsidiaries are governed by the European Commission's standard contractual clauses. Data flows with subcontractors are managed through data privacy agreements.

#### 7. WHAT IS THE DATA RETENTION PERIOD ?

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The data will be retained for the legal period or the required period of use.

We reserve the right, for certain profiles, to keep them for future opportunities, for which the data may be kept for the legal duration for each country, unless the candidate concerned objects.

Once these time limits have expired, and except in the event of pre-litigation or litigation, or at the request of a competent authority, the data is either deleted or kept after being anonymized, notably for statistical purposes. It may be retained in the event of pre-litigation and litigation.

## 8. YOUR RIGHTS

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You have the right to access your data, the right to rectify inaccurate data or data that needs to be updated, and the right to erase your data, as well as other rights set out in :

- Article 17 (right to erasure)
- Article 18 (right to restriction of processing)
- Article 21 (right to object)
- Article 22 (right to object to automated individual decision-making under the GDPR, where the criteria set out in this Article are met)

For processing based on consent, you can give or withdraw your consent at any time.

You have the right to lodge a complaint with a data protection authority if you believe that your rights have not been respected.

## 9. EXERCISING YOUR RIGHTS

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The Company appointed a Data Protection Officer (DPO) group who can be contacted at the following address : [ebarbry@racine.eu](mailto:ebarbry@racine.eu)

If you wish to exercise any of your rights personally, please contact our DPO.

## 10. SECURITY AND PROTECTION OF YOUR DATA

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Solina defines and implements security measures to prevent the destruction, loss, alteration or unauthorized disclosure of data. The computer systems and paper media used are organized and protected to ensure the security and confidentiality of your information.

## 11. UPDATE

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We reserve the right to change the presentation and content of this policy. Therefore, we encourage you to review it regularly.