



**DILITRUST**

# **IMS - Privacy Policy Job applicants**

**PUBLIC**

<b>Approved by</b>	DPO
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<b>Changes since the last version</b>	Review and update Updated : subcontractor table, retention period

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## 1. PREAMBLE

DiliTrust is committed to the protection of personal data and the privacy of individuals. As such, we hereby inform you of the conditions under which your personal data will be processed by us.

This Policy applies to applicants for employment.

These persons are hereinafter referred to as "Data Subjects".

## 2. DATA CONTROLLER

DiliTrust  
Tour Opus 12, 77 Esplanade du Général de Gaulle  
92081 PARIS LA DEFENSE CEDEX  
RCS of Nanterre: 400 701 918

Depending on the concerned office:

DiliTrust Canada Inc.

2045 Stanley Street, suite 1500

Montréal, QC, H3A 2V4

Canada

## 3. WHAT PERSONAL DATA DO WE PROCESS?

Dilitrust processes the following categories of personal data about Data Subjects:

- Identification data: last name, first name, postal address, email address, telephone number, photo if present on CV,
- Data related to professional life: Elements indicated on the CV and cover letters, elements collected during the interview,

- Data related to personal life: Elements indicated on the CV, cover letters and during interviews.
- Economic and financial data: Salary of the previous/current position, expectations
- Connection data: logs, time stamps, navigation path, type of browser
- Location data: country
- Internet data: IP address, browser language
- Data on criminal and administrative proceedings or sanctions for certain employees with privileged administrator access: criminal convictions (submission of a copy of the criminal record Bulletin N°3)
- Social security number

Your personal data comes exclusively from you. It is only the data that you have chosen to share with DiliTrust.

DiliTrust processes only the personal data strictly necessary to achieve the determined and legitimate purposes defined in the following sections.

### Why and how do we process your personal data?

DiliTrust is required to process the personal data of Data Subjects for these purposes :

Recruitment	
<b>Objectives and basis of legality</b>	Job applications management (Pre-contractual requirement) Creation and management of Resume database (legitimate interest) Insure future employees have no criminal record for position requiring a clear record (Pre-contractual requirement) Have evidences available in case of litigation or administrative control (legitimate interest)
<b>Length of retention</b>	A reminder is sent by the tool in question to determine if the data subject wishes us to delete their data. Softgarden: <input type="checkbox"/> Applicants/not hired that we keep data - Automatically delete/ update candidate profiles within the Talent Pool (automatic email): 24 months <input type="checkbox"/> Applicant that is hired: Automatically delete applications that had been set to "Hired" automatic email):24 months <input type="checkbox"/> Applicant rejected that we do not wish to keep CV: Automatically delete applications that had been set to "Rejected": 6 months
<b>Categories of recipients</b>	HR management Head of Recruitment Headhunters and recruitment agencies
<b>Data sources</b>	Data subject
<b>Mandatory or optional nature of the data collection and consequences in case of non supply of the data</b>	Necessary for the processing of the application

Contract management	
<b>Objectives and basis of legality</b>	Internal contract management (Legal requirement) For HR and legal followup (Legal requirement)
<b>Length of retention</b>	50 years after end of contract

<b>Categories of recipients</b>	HR Legal department General Management
<b>Data sources</b>	Data subject
<b>Mandatory or optional nature of the data collection and consequences in case of non supply of the data</b>	Necessary for the fulfilment of legal obligations in the field of labour law

GDPR	
<b>Objectives and basis of legality</b>	Respond to exercises of rights (legal obligation)
<b>Length of retention</b>	5 years after the closure of a dataright request (Statute of limitations)
<b>Categories of recipients</b>	Authority DPO Service in charge of litigation
<b>Data sources</b>	Data subject
<b>Mandatory or optional nature of the data collection and consequences in case of non supply of the data</b>	Necessary for the fulfillment of legal obligations regarding the reporting of violations and the exercise of rights.

In view of the purpose of each processing, DiliTrust implements the necessary means to ensure that personal data is only accessible by its internal departments that need to know it, third party recipients designated by the Law or subcontractors necessary to carry out the processing (see 3).

DiliTrust keeps the data collected for the time strictly necessary to achieve the purpose of each processing, except for exceptions provided for by the Law. These retention periods are communicated in the table opposite. In application of the RGPD, it is possible that your data may be kept by us for the time that the limitation periods for legal action are reached. In this case, only the persons in charge of the litigation within the company have access to it. At the end of these periods, your data is either deleted or irreversibly made anonymous.

## 4. TO WHOM ARE YOUR PERSONAL DATA TRANSMITTED OUTSIDE THE COMPANY?

DiliTrust is led to communicate your personal data to organizations within the framework provided by the Law. These recipients are indicated in the table (see 2.).

DiliTrust has recourse to subcontractors selected by it to carry out all or part of the processing indicated. DiliTrust may communicate you data to group subsidiaries for processes necessary to fulfill the purposes described herein. In exceptional cases, DiliTrust may use service providers located outside the European Union. Where applicable, DiliTrust ensures that the transfer to a third country is made legally by ensuring protection and guarantees provided by applicable laws, notably by the RGPD where applicable.

Subcontractor / Third party	Category	Country	Type of warranty (if third party country transfer)
<b>Welcome to the Jungle</b>	<b>Recruitment</b>	European Union	N/A
<b>Softgarden</b>	<b>Recruitment</b>	European Union	N/A
<b>JobTeaser</b>	<b>Recruitment</b>	France and European Union	

			N/A
<b>LinkedIn</b>	<b>Recruitment</b>	United States	<a href="#">DPA</a> et CCT
<b>Adobe</b>	<b>Contract management</b>	United States	<a href="#">DPA</a>
<b>Hunteed</b>	<b>Recruitment</b>	France	N/A
<b>Infojob</b>	<b>Recruitment</b>	EU	N/A
<b>France Travail</b>	<b>Recruitment</b>	France	N/A
<b>APEC</b>	<b>Recruitment</b>	France	N/A
<b>Sharepoint</b>	<b>Recruitment</b>	EU	N/A
<b>MFT (Equisign)</b>	<b>Contract management</b>	EU	N/A

## 5. WHAT SECURITY MEASURES DO WE PUT IN PLACE TO PROTECT YOUR DATA?

DiliTrust implements all organizational and technical measures to ensure an appropriate level of security for your personal data, and in particular to avoid any loss of confidentiality, integrity or accessibility.

## 6. WHAT ARE YOUR RIGHTS ON YOUR PERSONAL DATA?

You can exercise the following rights with DiliTrust regarding your personal data:

**A right of rectification:** you have the right to obtain the rectification of inaccurate data concerning you. You also have the right to complete the incomplete data concerning you, by providing a complementary declaration. If you exercise this right, we undertake to communicate any rectification to all the recipients of your data as far as possible.

**A right to erasure:** In some cases, you have the right to have your data erased. However, this is not an absolute right and we may for legal or legitimate reasons retain this data.

**A right to the limitation of processing:** in certain cases, you have the right to obtain the limitation of processing on your data.

**A right to portability of your personal data:** you have the right to receive your data that you have provided to us, in a structured, commonly used and machine-readable format, for your personal use or to pass it on to a third party of your choice. Moreover, DiliTrust may refuse the exercise of this right if it would require technical means deemed excessive.

**A right to object to processing:** you have the right to object at any time to the processing of your data for processing. This is not an absolute right and we may for legal or legitimate reasons refuse your request to object.

**The right to withdraw your consent at any time:** you may withdraw your consent to the processing of your data where the processing is based on your consent. Withdrawal of consent does not affect the lawfulness of processing based on consent carried out prior to such withdrawal.

**The right to give instructions regarding the fate of your data after your death.**

DiliTrust will respond to any exercise of rights as soon as possible and in any event within 30 days of receiving the request. DiliTrust reserves the right:

To request proof of the identity of the applicant in case of reasonable doubt, in order to respect its obligation of confidentiality,

To extend the response time by two months, informing the applicant of this extension and the reasons for the postponement within one month of receipt of the request,

To refuse to respond to an exercise of a right if it is considered abusive (in view of their number, repetitive or systematic nature).

## 7. HOW TO EXERCISE YOUR RIGHTS ON YOUR PERSONAL DATA?

To exercise your rights, you can contact us to this address: [contact-dpo@dilitrust.com](mailto:contact-dpo@dilitrust.com)

or by post at the address indicated above.

If, in spite of our efforts and commitments, you believe that your rights concerning your personal data have not been respected, you may submit a complaint to your competent supervisory authority.