

## EDENPEOPLE PRIVACY POLICY FOR EXTERNAL RECRUITMENT

EdenPeople (Edenred Human Resources Information System - HRIS) includes an external recruitment module, its objective being to facilitate and harmonize the management of applications and potential future candidates. The external recruitment module is accessible to the following types of data subjects:

- ❖ **Candidates** (either prospects, referrals or external candidates wishing to apply for a job offer published by Edenred – for simplification, all these categories are referred to as “Candidates” within this policy)
- ❖ **Ready for hire** (Candidates who will receive a job offer from Edenred)
- ❖ **Pre-hire** (Candidates who have signed a job offer with Edenred)

As part of this activity, some of your personal data is processed by Edenred. The objective of this information notice is therefore to inform you about the personal data we collect in the context of the external recruitment module and how we use it.

Moreover, to enhance and streamline its recruitment process, Edenred has decided to implement the “LinkedIn Recruiter” tool, a SaaS solution provided by LinkedIn Ireland Unlimited Company (“The LinkedIn Platform”). This information notice will also provide information on how Edenred collects, processes, and safeguards your personal data in the context of using the LinkedIn Platform for recruitment management, in strict compliance with applicable data protection laws and regulations. Please refer to the dedicated section at the end of this notice.

For all other data processing operations not identified below and carried out by the LinkedIn Platform, LinkedIn Ireland Unlimited Company will act as the data controller. To obtain more information on such processing, we invite you to consult the dedicated part about LinkedIn recruiter below and LinkedIn’s privacy policy available on the following link: <https://www.linkedin.com/legal/privacy-policy>.

### Identity of data controller

Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) whose head office is located at 1 Dean Street, London, England, W1D 3RB, is the data controller of your personal data processed in EdenPeople.

### Categories of personal data collected

Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) as data controller, informs you that, through EdenPeople, depending on the categories below, it collects your personal data related to:

- ❖ Prospects
  - Your identity information (i.e. first name and last name, etc.)
  - Your contact information (i.e. personal email address and phone number, etc.)
  - Your professional life information (i.e. resume and experience level, etc.)

Your personal data may have been indirectly collected, manually, by Edenred through the following ways: LinkedIn profile, external Agencies Candidate, Networking Event, University Forum, referred profile, sourcing on Job Boards, or former application for a job.

- ❖ Referrals
  - Your identity information (i.e. first name and last name, etc.)
  - Your contact information (i.e. personal email address and phone number, etc.)
  - Your professional life information (i.e. resume and experience level, etc.)

Your personal data have been indirectly collected by Edenred via the referral process, i.e. an Edenred employee has suggested your profile for an open position in our company.

- ❖ External candidates

- Your identity information (i.e. first name and last name, etc.)
- Your contact information (i.e. personal email address and phone number, etc.)
- Your professional life information (i.e. resume and experience level, etc.)
- If you have created one, your account information (i.e. login, password and, if the case may be, job alerts)
- Your candidate information (i.e. compensation requested, application status, etc.)

Your personal data is directly collected through the application form, and during exchanges that may occur as part of the recruitment process.

- ❖ Ready for hire (Candidates who will receive a job offer from Edenred)
  - Your identity information (i.e. first name and last name, etc.)
  - Your contact information (i.e. personal email address and phone number, etc.)
  - Information related to the job offer, necessary to generate the offer letter
  
- ❖ Pre-hire (Candidates who have signed a job offer with Edenred)
 

Once your profile has been selected, complementary information will be requested from you.

  - Your identity information (i.e. first name and last name, gender, etc.)
  - Information necessary to allow the successful completion of the hiring and onboarding process of new hires, (i.e. date and place of birth, marital status, last obtained diploma, national ID including national insurance number, social security number (necessary for establishing pay slips and complying with Reward Gateway's legal obligations), work permit, financial information for payroll, and other information such as information related to disabilities, photograph, etc.

Your personal data is directly collected through EdenPeople and during exchanges that may occur as part of the recruitment process.

#### **Purposes of the processing**

Your personal data is processed by Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) for the purposes of:

- ❖ Prospects & Referrals management
  - Identification of potential future candidates
  - Encouraging applications for jobs in EdenPeople
  
- ❖ External candidate management
  - Enable the successful completion of the recruitment process
  - Checking that the candidate's profile matches the expectations of the proposed position
  - Checking that the external candidate's profile matches the criteria sought for a future job (Candidate pool management)
  - Give visibility to candidates regarding the follow-up and history of their application process
  - Communicating to the candidates about job offers that may be of interest to them.
  
- ❖ Ready for hire (Candidates who will receive a job offer from Edenred)
  - Generating an offer letter and providing digital signature of this offer letter.
  
- ❖ Pre-hire management (prospects, referrals or external candidates who have signed a job offer with Edenred)
  - Collect the necessary documents to establish the employment contract
  - Prepare the needed IT material
  - Create the new hire in the Active directory
  - Prepare the employee badge (photo)
  - Customize EdenPeople account with a photo
  - Create payroll account
  - Assign Edenred Group's mandatory learning sessions to the pre-hire

#### **Legal basis of the processing**

Those personal data processing activities are respectively legally grounded on:

❖ Prospects & Referrals

It is Edenred legitimate interest to identify potential future candidates whose profile is likely to be of interest to recruiters and to encourage them to apply for published job offers.

❖ External candidates

- Some pre-employment requirements imply the processing of your personal data to manage the application's steps, and the application's evaluation (i.e. verification of the suitability of the profile with the company's needs)
- The pre-hiring step is based on the compliance with legal obligations Edenred is subject to relevant local legislation.
- It is Edenred legitimate interest to communicate to the candidates about job offers that may be of interest to them and to identify profiles that could match the criteria sought for a future job, because it allows to optimize the recruitment process.

❖ Ready for hire (Candidates who will receive a job offer from Edenred)

It is Edenred legitimate interest to process your information to generate an offer letter and propose the digital signature of the document.

❖ Pre-hire (Candidates who have signed a job offer with Edenred)

- The collection of your information to prepare your contract, prepare your IT material, your payroll account and create your profile in the Active Directory is necessary for the execution of pre-contractual measures and the establishment of the contractual relationship between the pre-hire and Edenred.
- It is Edenred legitimate interest to collect your photo to create your employee badge of access.
- The collection of your photo to customise your account, that will be used for the organisational chart is based on your consent.

**Recipients of the personal data**

Your personal data will be accessible to the authorized personnel of Edenred SE, i.e. the Human Resources Department members in charge of recruitment and the managers to whom the offer is attached, each of them with dedicated access rights according to the scope of their need-to-know.

Your personal data will not be disclosed to third parties except, as necessary, to the following companies, along with their own subcontractors, expressly authorized by Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) for the performance of the service provided:

- Edenred SE, the Headquarter of Edenred, to provide assistance regarding maintenance, administration management, authorization, massloading, purge and exercise of rights.
- Workday Limited, the SaaS solution provider and Mercer EverBe, the integrator, both ensuring the maintenance and technical support
- ConvictionsRH, supporting the HRIS Run team in the implementation and maintenance of EdenPeople and its future evolutions
- Everbe, supporting the HRIS Run team in the implementation and maintenance of EdenPeople and its future evolutions
- DocuSign, (for ready for hire and Pre-hire only) the digital signature provider (DocuSign shall not retain the data after 1 day).
- Microsoft, (for Pre-hire only) integrating your contact into the Active Directory
- Braze, to facilitate positive user experience

**Transfer of the personal data**

Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) ensures that your personal data collected within the EdenPeople framework will not be transferred outside the European Union in the absence of an adequacy decision by the European Commission (article 45 of the GDPR) or the establishment of appropriate and adequate safeguards ensuring the security and protection of your personal data, in this case standard contractual clauses (article 46 of the GDPR).

In the frame of administration support provided by Workday, your data might be transferred to the USA (in exceptional situations for a very specific issue when access from a European country is not possible).

### **Retention of the personal data**

❖ Prospects & Referrals

Your personal data is retained by Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) for 3 months from the time of the registration performed by the recruitment team or the Edenred employee referring. If you choose to apply to an offer, you become an external candidate. The retention periods below will thus apply.

❖ External candidates

Your external candidate information will be retained by Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) for 2 years from your last application date in a CV database, so that you can be recontacted if we identify new offers that could correspond to your profile. Please note that if you created a candidate account, the data linked to your account will be retained by Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) for 2 years from the last connection to your candidate account. If you are recruited by Edenred and that you are involved in the pre-hiring step, the collected personal data for this need will be saved in your employee file.

❖ Ready for hire and pre-hire

Your personal data is retained as long as you are in a professional relationship with Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC). After termination of your contract, your personal data will be sorted out and the remaining data retained only for legal purposes, notably such as accountings, tax or social reasons for 6 years.

Once these periods are reached, your personal data is definitively deleted.

### **Exercise of rights for data subject**

In accordance with the applicable regulation, you are entitled to access to, rectify, and erase your data. Under certain circumstances and the conditions set forth in the applicable law, you also have a right to object to and obtain restriction of the data processing activity, and a right to data portability.

You can exercise your rights, by filling in the relevant form accessible [here](#), or by writing to Reward Gateway (UK) Limited, 3<sup>rd</sup> Floor, 1 Dean Street, London, England, W1D 3RB A proof of identity may be requested in order to verify your identity or your status as a data subject. Should it be requested, such a proof will be deleted as soon as your identity is verified.

For any other type of requests or complaints, you can contact the Data Protection Correspondent by sending an email to [dpo.uk@edenred.com](mailto:dpo.uk@edenred.com)

We also remind you that you can lodge a complaint about the processing of your personal data with your local personal data protection authority, such as the information Commissioner's Office (ICO), the UK supervisory authority for data protection issues [Contact us | ICO](#)

### **Artificial Intelligence**

As part of its activities, Edenred may use artificial intelligence (AI) technologies when providing services or products, in the context of chat sessions/conversational agent or within Edenred activities. Edenred is committed to adhering to the applicable laws and regulations related to the use of AI, which includes ensuring the responsible, ethical, transparent and trustworthy use of AI within its business activities.

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### **Information on the use of the LinkedIn Recruiter Platform**

### **Purposes of the processing**

To ensure transparency, Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) informs you of the purposes for which your personal data is processed within the LinkedIn Platform.

These purposes include several sub-purposes, which are detailed below:

- **Managing job applications:** This purpose aims to facilitate the recruitment process by ensuring efficient management of job applications.
  - **Publication of job offers:** Job opportunities are made accessible to a broad audience to identify profiles whose skills and career paths align with the expectations for a specific position.
  - **Collecting and storing job applications:** applications are centralized within the tool to enhance organization and efficiency in the recruitment process.
- **Sourcing of candidates:** This purpose focuses on identifying and engaging potential new candidates who may be a good fit for job openings.
  - **Identification of potential new candidates:** Profiles with relevant career paths and skills are encouraged to apply for specific job offers.
  - **Ranking of potential new candidates:** Submitted applications are evaluated to determine which candidates best match the position's requirements.
  - **Encouraging potential new candidates to apply:** Identified profiles are proactively engaged and invited to apply for relevant job opportunities.

### **Categories of personal data concerned**

For the purposes listed above, Edenred, as data controller informs you that, for the purposes listed above, it collects the following personal data:

- **Identification data:** First name, last name, photograph
- **Contact information:** contact details (e.g.: email and/or phone number)
- **Professional information:** Company name, job title, professional experiences, location, internal or external candidate, skills and assessments, year of graduations, degree, schools/university education, industries, seniority, current company size, past jobs, years in current company/position, spoken languages, network relationships, type of workplace, resume.
- **Connection data:** IP address, device/browser characteristics
- **Other:** mutual connections and/or other connections within the company, open to work, active talent, interest in company, whether or not the candidate has already been contacted by a recruiter, resumes uploaded as part of job application, notes on a candidate profile

### **Legal basis of the processing**

Those personal data processing activities are legally grounded on the legitimate interests of Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) in carrying out its recruitment operations.

### **Recipients of personal data**

Your personal data will be accessible to the authorized personnel of Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC), each of them with dedicated access rights according to the scope of their need to know. Your personal data will not be disclosed to third

parties except to **LinkedIn Ireland Unlimited Company**, the SaaS solution provider, along with their own subcontractors, for the performance of the service provided.

### **Transfer of personal data**

The use of the LinkedIn Platform by Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) will involve a transfer of your personal data to the following third countries: United States.

Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) ensures that your personal data collected for the previously stated purposes will not be transferred outside the European Union in the absence of an adequacy decision by the European Commission (article 45 of the GDPR) or the establishment of appropriate and adequate safeguards ensuring the security and protection of your personal data, in this case, standard contractual clauses (article 46 of the GDPR).

### **Retention of the personal data**

For the management of job applications, your personal data is retained by Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) for 2 years from the date of application of the candidate, or 5 years if the candidate is recruited. They are then deleted.

For the sourcing of candidates, your personal data is retained by Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) for 3 months from the end of the recruitment procedure. They are then deleted.

### **Using an AI-assisted information system**

The LinkedIn Platform leverages Artificial Intelligence (AI) algorithms to rank candidate profiles and suggest the most relevant ones to recruiters. Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC) uses these AI features to manage applications more effectively and ensure a consistent evaluation process. However, this use does not replace human decision-making, and every decision is reviewed by our recruitment team to maintain fairness and accuracy. Edenred is committed to adhering to the applicable laws and regulations related to the use of AI, which includes ensuring the responsible, ethical, transparent and trustworthy use of AI within its business activities.

### **Exercise of rights for data subject**

In accordance with the applicable regulation, you are entitled to access to, rectify but also erase your data (unless your personal data is necessary to comply with a legal obligation). You have also a right to object to and to obtain restriction of the data processing activity.

You can exercise your rights, enclosing proof of identity where required, by filling in the relevant form accessible [here](#) or by writing to Reward Gateway (UK) Limited, 3<sup>rd</sup> Floor, 1 Dean Street, London, England, W1D 3RB.

For any other type of requests or complaints, you can contact the Data Protection Correspondent by sending an email to [dpo.uk@edenred.com](mailto:dpo.uk@edenred.com)

We also remind you that you can lodge a complaint about the processing of your personal data with your local personal data protection authority, such as Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues [Contact us | ICO](#)

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## **Cookies**

❖ Cookies strictly necessary for the Edenred career page:

The cookies below enable Edenred career page to function optimally and are processed by Reward Gateway (UK) Limited, (Reward Gateway US Inc, Reward Gateway Pty Limited and Reward Gateway Bulgaria LLC), acting as data controller. You can object and delete them using your browser settings, however your user experience may be degraded.

Put in place by	Name	Objective	Retention
Workday	PLAY_LANG	Identifies selected language	Session
Workday	PLAY_SESSION	Preserves users states across page requests	Session
Workday	TS01292a30	Security cookie to help protect the web infrastructure from security attacks	Session
Workday	TimezoneOffset	Sets timezone	Session
Workday	Wday_vps_cookie	Load balancer cookie for sticky session	Session
Workday	enableprivacytracking	Identifies the closure of the cookie banner	Session
Workday	WorkdayLB_SAS	Not disclosed	Session
Workday	TS01db906f	Security cookie to help protect the web infrastructure from security attacks	Session

Also, we would like to inform you that in order to improve its online job application process, Edenred Group implemented on its career page, the widget “Apply with LinkedIn”. This device allows the applicant to automatically fill the application form on Edenred website with their data stored on LinkedIn website.

If the job seeker opts to click Apply with LinkedIn, he/she requested to log in into LinkedIn, if not already. LinkedIn will therefore share relevant information from job seeker’s LinkedIn profile to Edenred career website. The job seekers can review this pre-populated information in the job application and edit (if required) before submitting their application.

In order to display the “Apply with LinkedIn” button, we inform the applicants that LinkedIn cookies are deposited by LinkedIn once the job seeker clicks on a job description.

Put in place by	Name	Objective	Retention
Linkedin	bcookie	Browser identification cookie to uniquely identify devices accessing LinkedIn to detect abuse on the platform.	One Year
Linkedin	bscookie	Used to save the 2FA state of a logged in user	One year
Linkedin	Lidc	To optimize data center selection	24 hours
Linkedin	Lang	Used to remember the language chosen by the user	Session
Linkedin	Jsessionid	Used for CSRF (Cross-Site Request Forgery) protection	Session