



Data Protection Compliance

July 2025

# EDENPEOPLE EXTERNAL PRIVACY POLICY

TRFC-POL-08-COMP

## INTRODUCTION

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 TRFC – for simplification, all these categories are referred to as “Candidates” within this policy)
- ▶ Ready for hire (Candidates who will receive a job offer from TRFC)
- ▶ Hire (Candidates who have signed a job offer with TRFC)

As part of this activity, some of your personal data is processed by TRFC. 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.

## IDENTITY OF DATA CONTROLLER

TRFC, whose head office is located One The Embankment, Neville Street, Leeds, LS1 4DW, is the data controller of your personal data processed in EdenPeople.

## CATEGORIES OF PERSONAL DATA CONCERNED

TRFC, as data controller, informs you that, through EdenPeople, 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 TRFC 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 TRFC 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 TRFC)
  - 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

- ▶ Hire (Candidates who have signed a job offer with TRFC)  
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 social security number (necessary for establishing pay slips and complying with TRFC's legal obligations related), 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 TRFC 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 TRFC)
  - Generating an offer letter and providing digital signature of this offer letter.

- ▶ Hire management (prospects, referrals or external candidates who have signed a job offer with TRFC)
  - Collect the necessary documents to establish the employment contract
  - Prepare the needed IT material
  - Create the new hire in the Active directory
  - 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 TRFC's 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)
  - It is TRFC's 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 TRFC)
  - It is TRFC's legitimate interest to process your information to generate an offer letter and propose the digital signature of the document.
- ▶ Hire (Candidates who have signed a job offer with TRFC)
  - 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.

## RECIPIENTS OF THE PERSONAL DATA

Your personal data will be accessible to the authorized personnel of TRFC, 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 TRFC 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).

## TRANSFER OF THE PERSONAL DATA

TRFC 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 TRFC for 3 months from the time of the registration performed by the recruitment team or the TRFC 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 TRFC 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 TRFC for 2 years from the last connection to your candidate account. If you are recruited by TRFC and that you are involved in the hiring step, the collected personal data for this need will be saved in your employee file.
- ▶ Ready for hire and hire
  - Your personal data is retained as long as you are in a professional relationship with TRFC. 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 5 years as a minimum and 20 years as a maximum in case of litigation.

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

## COOKIES

Cookies strictly necessary for the TRFC career page:

The cookies below enable TRFC career page to function optimally and are processed by TRFC, 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

## AI

As part of its activities, TRFC 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.

## EXERCISE OF RIGHTS FOR DATA SUBJECT

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

You can exercise your rights, by clicking on this [form](#). For any other type of requests or complaints, you can contact the Data Protection Correspondent by sending an email to [dpo@rightfuelcard.co.uk](mailto:dpo@rightfuelcard.co.uk).

We also remind you that you can lodge a complaint about the processing of your personal data with your local personal data protection authority, Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, SK9 5AF or by telephone on 0303 123 1113.