#### EDENPEOPLE PRIVACY POLICY FOR EXTERNAL RECRUITMENT

EdenPeople includes Edenred's new 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:

- Prospects
- Referrals
- External candidates wishing to apply for a job offer published by Edenred

As part of this activity, some of your personal data are 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.

### Identity of data controller

Accentiv (India) Private Limited, whose registered office is located at L M Krishna Building No. 5, Balavinayagar Nagar Main Road, Arumbakkam, Chennai – 600106, Tamilnadu, India, is the data controller of your personal data processed in EdenPeople.

#### Categories of personal data collected

Accentiv (India) Private Limited, 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 are directly collected through the application form, and during exchanges that may occur as part of the recruitment process.

## Purposes of the processing

Your personal data is processed by Accentiv (India) Private Limited 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
- Allow the successful completion of the hiring process
- Ensure compliance of the hiring process with legal obligations

## 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

- The pre-contractual needs linked with the recruitment process (i.e. verification of the suitability of the profile with the company's needs) imply the processing of your personal data to globally manage the application's steps, and the application's evaluation.
- It is Edenred legitimate interest to communicate to the candidate 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.

## Recipients of the personal data

Your personal data will be accessible to the authorized personnel of Edenred SA, 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 Accentiv (India) Private for the performance of the service provided:

- Edenred SA, the Headquarter of Edenred, to provide assistance regarding maintenance, administration management, authorization, massloading, purge and exercice 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

### Transfer of the personal data

Accentiv (India) Private Limited 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 an European country is not possible).

# Retention of the personal data

### Prospects & Referrals

Your personal data are retained by Accentiv (India) Private Limited for 3 months from the time of the registration performed by the recruitment team or the Edenred employee referring. If you choose to candidate 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 Accentiv (India) Private Limited 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 Accentiv (India) Private Limited 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.

Once these periods are reached, your personal data are 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.

For example, you may make changes to your personal information (eg. Contact Information, Personal Information, Emergency Contacts and etc.) by accessing the *Personal Information* icon at the Applications section of the homepage of EdenPeople.

In addition, you can exercise your rights by writing to us through <u>Data Subject Access Request (DSAR)</u>. If you have further queries in this regard, you may contact our HR Department, at L M Krishna Building No. 5, Balavinayagar Nagar Main Road, Arumbakkam, Chennai – 600106, Tamilnadu, India.

### **Changes to this Privacy Notice**

We may update this Privacy Notice from time to time. Please visit our website periodically to view the latest notice or changes.

Changes to this Notice take effect as and when they are updated on our website.

Version 2.0 Updated 11 Aug 2022

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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 Accentiv (India) Private Limited, acting as data controller. You can oppose 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 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	Identies the closure of the cookie banner	Session

Workday	WorkdayLB_SAS	Forwards requests for a single session to the same server for consistency of service	Session
Workday	TS01db906f	Security cookie to protect the web infrastructure from security attacks	Session