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
globalVCard, LLC doing business as Edenred Pay, whose head office is located 3301 Bonita Beach Road SW, Unit 300, Bonita Springs, FL, 34134, is the data controller of your personal data processed in EdenPeople.

Categories of personal data collected
globalVCard, 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 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 globalVCard, 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
- 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.
- The pre-hiring step is based on the compliance with legal obligations Edenred is subject to applicable federal, state and local laws.
- 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 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 globalVCard, 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

Transfer of the personal data

globalVCard, 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 an European country is not possible).

Retention of the personal data

❖ Prospects & Referrals

Your personal data are retained by <mark>globalVCard, LLC</mark> 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 <mark>globalVCard, LLC</mark> 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 <mark>globalVCard, LLC</mark> 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.

You can exercise your rights, enclosing proof of identity, by sending an email to <mark>erpay_privacy@edenred.com</mark> or by writing to <mark>Edenred Pay, 3301 Bonita Beach Road SW, Unit 300, Bonita Springs, FL, 34134.</mark>

For any other type of requests or complaints, you can contact the Data Protection Correspondent by sending an email to data-protection@edenred.com.

<mark>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 Federal Trade Commission.</mark>

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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 Edenred Benefits LLC and Edenred Fleet & Mobility USA LLC, 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 help protect the web infra-structure 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	Not disclosed	Session
Workday	TS01db906f	Security cookie to help protect the web infra-structure 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, they are requested to log in into LinkedIn, if not already. LinkedIn will therefore share relevant information from job seeker's LinkedIn profile to Edenred career site. The job seeker 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 ti remember the language chosen by the user	Session
Linkedin	Jsessionid	Used for CSRF (Cross-Site Request Forgery) protection	Session

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