



SMCP

sandro • maje • claudie pierlot • fursac

PERSONAL DATA CHARTER
CANDIDATE

January 2022

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Preamble

The SMCP Group, encompassing the Sandro, Maje, Claudie Pierlot and Fursac brands (hereinafter collectively referred to as '**the Group**' or '**we**'), places great importance on the principles of honesty and transparency, and is committed to establishing a relationship with each candidate for recruitment (hereinafter referred to as '**the candidate**', '**you**' or '**your**') based on mutual trust. Part of this commitment involves protecting and respecting privacy.

This is why each candidate will find below our commitment to protecting personal data as well as the procedures for processing their personal data across all Group entities worldwide.

In this context, the data controller is the company to which you are applying and whose contact details are available [here](#).

The Group has appointed a Data Protection Officer (hereinafter '**DPO**') who can be contacted at dpo@smcp.com for any questions regarding the processing of your personal data.

CHAPTER 1

What is the charter's scope of application?

Article 1 – What is personal data?

'Personal data' refers to any information that could identify you directly (e.g. your surname or first name) or indirectly (e.g. data that does not name you, such as your telephone number, your professional experience, etc.). This means that personal data includes information such as postal/email addresses, landline or mobile phone numbers, identity photos, information about your family situation, and so on.

Article 2 – What personal data do we process?

The type of information we may hold about you concerns: your identity, your postal address, your email address, your date and place of birth, your telephone number, and any personal data on your CV, in the video you send us if you are applying by video, or on any other material shared with us.

We may also collect your salary expectations, references, diplomas, the amount of your current income and/or your pay slip, and the results of your personality test. Finally, we may ask you, if necessary, for an extract from your criminal record as well as your residence permit.

Article 3 – What are our commitments?

Each of the Group's entities processes all your personal data in accordance with the terms of this charter and in accordance with applicable legislation.

In particular, each of the Group's entities is committed to ensuring that the data it collects is:

- Processed **fairly, lawfully and transparently**,
- Used **in accordance with the purposes** for which it was collected,
- Kept in such a way as to ensure its **security and confidentiality**,
- **Updated as regularly** as possible.

CHAPTER 2:

How do we use your personal data?

Article 1 – For what purposes and on what legal bases do we process your personal data?

The purpose of processing reflects the main purpose of using personal data. We collect and use your data for a well-defined and legitimate purpose in order to manage the human resources of the various businesses of our Group.

The legal bases most frequently used in the context of recruitment management are:

- Meeting our legitimate interest (e.g. creating a CV library);
- Your consent (to retain your resume (CV) for more than 2 years).

You will find below a table which shows, for each purpose of processing (i.e. the main purpose of using your data), the legal basis (i.e. the basis on which using your data is lawful) that we maintain:

Legal basis	Purposes of processing
Our legitimate interest	<ul style="list-style-type: none">• Collection of applications by classic CV, video or any other means• Management of interviews• Creation of a CV library• Management of application monitoring tables
Your consent	<ul style="list-style-type: none">• Retention of your CV for more than 2 years (initial retention period) after obtaining your approval

Article 2: How do we collect or receive your personal data?

We collect your personal data directly from you, including through our questionnaires or when you send us your CV or video. Your data may also be sent to us by third parties (recruitment agencies).

Article 3: Who can access your personal data?

Your personal data is only accessible to persons authorised in their respective roles and missions within the Group, particularly members of the Human Resources department and those involved in the interviews as part of the recruitment process.

In addition, we may transfer your data to trusted third parties to carry out a set of processing procedures on our behalf, such as service providers involved in the management of human resources. We ensure that these individuals maintain the necessary safeguards to protect the security and confidentiality of your personal data.

When we transfer personal data to third parties, we only provide the data they need to perform the service and we ensure that they do not use your personal data for any other purpose. We systematically

make every effort to guarantee that the third parties with whom we work protect the confidentiality and security of your data.

Article 4: Where do we store your personal data?

Our processing of personal data is mainly carried out within the European Economic Area (the 'EEA').

In the event that we transfer your personal data to a country outside the EEA whose level of protection is not considered adequate by the European authorities, we undertake to supervise the relevant transfer through appropriate safeguards in accordance with applicable legislation.

For example, we will ensure that companies importing your personal data sign data processing contracts based on standard contractual clauses approved by the European Commission or that they have adhered to a code of conduct or a certification mechanism.

In the event that your personal data is transferred to our entities located outside the European Union, the same guarantees are implemented.

You can request more information on the guarantees implemented by sending an email to us at the following address: dpo@smcp.com.

Article 5: How long do we retain your personal data?

In the event of a negative outcome for your application, we will retain your personal data for a period of 2 years from our last contact with you unless you object to this.

Your data may be stored beyond this period of 2 years, subject to obtaining your prior consent.

CHAPTER 3:

How can you exercise your rights in relation to your personal data?

The Group respects your right to privacy, and recognises that it is important that you have control over your personal data. You have the following rights which you can exercise either directly with the Human Resources department, or with the DPO at the following address dpo@smcp.com:

Your rights	What this means
The right to be informed	You have the right to obtain clear, transparent, comprehensible and easily accessible information on how we use your personal data and your rights. This is why we provide you with the information in this charter.
The right of access	<p>You have the right to access the personal data we hold that concerns you (subject to certain restrictions).</p> <p>We may require payment of reasonable fees taking into account the administrative costs incurred in providing the information.</p> <p>Manifestly unfounded, excessive or repeated claims are likely to receive no response.</p>
The right to rectification	You have the right to demand that your personal data be rectified if it is inaccurate or out of date and/or that it be completed if it is incomplete.
The right to erasure/right to be forgotten	In some cases, you have the right to have your personal data erased or deleted. This is not an absolute right, insofar as we may be forced to retain your personal data for legal or legitimate reasons.
The right to object to the processing of data based on legitimate interest	You may object to the processing of your data at any time when the processing is based on legitimate interest.
The right to data portability	You have the right to move, copy or send data which concerns you from our database to another. This applies only to data you have provided when the processing is based on your consent or on a contract and is carried out by automated means.
The right to restrict processing	<p>You have the right to request the restriction of our processing of your personal data. This right means that the processing we carry out on your personal data is limited, so that we may retain this data but not use or process it.</p> <p>This right applies in special circumstances provided for by the General Data Protection Regulation, namely:</p> <ul style="list-style-type: none">• You dispute the accuracy of the personal data. We may retain it for a given period to enable us to verify the accuracy of your personal data;• The processing is unlawful and you object to its erasure and instead demand the restriction of its use;• We no longer need your personal data for the purposes of the processing, but you still need the data to establish, exercise or defend legal claims;

	<ul style="list-style-type: none"> You object to the processing based on our legitimate interests. We may retain your personal data while verifying whether our legitimate interest takes precedence over yours.
The right to define instructions	<p>You can also define general or specific instructions as to the fate of your personal data after your death.</p> <p>General instructions can be registered with a trusted third party certified by the regulatory authority of your country, while specific instructions can be sent directly to us.</p>

Finally, please note that in the event of a complaint relating to the protection of your personal data, you can also contact the regulatory authority of your country.