SMCP

PERSONAL DATA CHARTER CANDIDATE

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PREAMBLE

The SMCP group, comprising the Sandro, Maje, Claudie Pierlot and Fursac brands (hereinafter collectively referred to as the "**Group**" or "**we**"), attaches great importance to the principles of honesty and transparency, and is committed to building a relationship based on mutual trust with every job candidate (hereinafter "**the candidate**", "**you**" or "**your**"). Part of this commitment involves protecting and respecting privacy.

This is why every 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 you are applying to, whose contact details are available here.

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

CHAPTER 1

What is the scope of the charter?

Article 1 – What is personal data?

"**Personal data**" refers to any information that could identify you directly (e.g. your surname, first name) or indirectly (e.g. through non-identifying data such as your telephone number or professional experience). This means that personal data includes information such as postal/email addresses, landline or mobile telephone numbers, ID photos, information relating to your family situation, etc.

Article 2 – What personal data do we process?

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

We may also collect your salary expectations, references, qualifications, as well as your current income amount and/or payslip, or the results of your personality test. Finally, we may ask you, where applicable, for a criminal record check and your residence permit.

Article 3 - What are our commitments?

Each Group entity processes all your personal data in accordance with the terms of this Charter and applicable legislation.

More specifically, each Group entity ensures that the data it collects is:

- Processed fairly, lawfully and transparently;
- Used in accordance with the purposes for which it was collected;
- Kept in a way that ensures 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 the processing corresponds to the main objective of using the personal data. We collect and use your data for a specific and legitimate purpose relating to the human resources management of the various companies within our Group.

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

- The pursuit of our legitimate interests (e.g. building a CV database);
- Your consent (to keep your CV for more than 2 years).

Below is a table showing, for each processing purpose (i.e. the main objective of using your data), the legal basis (i.e. the foundation on which the use of your data relies to be lawful) that we apply:

Legal basis	Purposes of processing
Our legitimate interest	• Collection of applications via standard CV, video or any other means • Management of applications and assessment of candidates' suitability for positions to be filled, including through the use of artificial intelligence assistance tools • Qualification of applications following an exchange with the candidate by any means, including calls, SMS, and electronic communication (WhatsApp) • Interview management • Building a CV database • Management of application tracking boards
Your consent	• Retention of your CV beyond 2 years (initial retention period) after obtaining your agreement

Use of an artificial intelligence tool in recruitment: As part of the recruitment process, we may use an artificial intelligence tool to assist in the analysis of applications and the assessment of candidates' suitability for open positions. This tool analyses the information provided by candidates during the application process, including their CV and the information entered on the recruitment platform.

The results generated by this tool are used solely to support the evaluating of applications and constitute only one factor among others in the overall assessment process. Human Resources teams and the relevant hiring managers review applications and remain solely responsible for recruitment decisions. No decision producing legal effects concerning a candidate, or similarly significantly affecting a candidate, is based solely on automated processing.

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

We collect your personal data directly from you, in particular via our questionnaires or when you send us your CV or video. Your data may also be sent to us by service providers in charge of recruitment operations.

Article 3: Who can access your personal data?

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

Furthermore, we may need to transmit your data to trusted third parties to carry out a range of processing operations on our behalf, such as service providers in charge of recruitment operations or involved in human resources management, including providers of technological solutions used in recruitment. We ensure that they provide the necessary guarantees to respect the security and confidentiality of your personal data.

When we transfer personal data to third parties, we only provide them with the data they need to perform the service, and we require them not to use your personal data for other purposes. We always make every effort to ensure that the third parties we work with maintain the confidentiality and security of your data.

Article 4: Where do we store your personal data?

Our processing of personal data is primarily 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 are committed to ensuring the transfer is subject to appropriate safeguards in accordance with applicable legislation.

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

In the event of a transfer of your personal data to our entities located outside the European Union, the same safeguards are put in place.

You can request more information about the safeguards in place by sending us an email at the following address: dpo@smcp.com.

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

If your application is unsuccessful, we will keep your personal data for a period of 2 years from our last contact with you, unless you object.

Your data may be kept beyond this 2-year period, subject to obtaining your prior consent.

CHAPTER 3

How can you exercise your rights regarding your personal data?

The Group respects your right to privacy: 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, understandable, and easily accessible information about how we use your personal data and about your rights. This is why we are providing you with the information in this Charter.
The right **of access**	You have the right to access the personal data we hold about you (subject to certain restrictions). We may charge a reasonable fee taking into account the administrative costs of providing the information. Manifestly unfounded, excessive, or repetitive requests may not be answered.
The right to **rectification**	You have the right to request that your personal data be rectified if it is inaccurate or out of date and/or completed if it is incomplete.
The right to **erasure/right to be forgotten**	In certain cases, you have the right to obtain the erasure or deletion of your personal data. This is not an absolute right, as we may be required to retain your personal data for legal or legitimate reasons.
The right to **object to data processing based on legitimate interests**	You can object to the processing of your data at any time when the processing is based on legitimate interests.
The right to **data portability**	You have the right to move, copy, or transfer your data from our database to another. This only applies to data that you have provided, where the processing is based on your consent or on a contract, and is carried out by automated means.
The right to **restriction of processing**	You have the right to request the restriction of the processing we carry out on your data.

	This right means that our processing of your data is restricted, so we can store this data, but not use or process it. This right applies in specific circumstances set out in the General Data Protection Regulation, namely: • You contest the accuracy of the personal data. We may retain it for a period enabling us to verify the accuracy of your personal data; • The processing is unlawful and you oppose its erasure, requesting the restriction of its use instead; • We no longer need your personal data for the purposes of the processing, but it is still required by you for the establishment, exercise, or defence of legal claims; • You have objected to processing based on our legitimate interests. We may retain your personal data while verifying whether our legitimate grounds override yours.
The right to **set guidelines**	You can also set general or specific guidelines regarding the fate of your personal data after your death. General guidelines can be registered with a trusted third party certified by the supervisory authority in your country, while specific guidelines can be addressed directly to us.
The right **not to be subject to automated individual decision-making**	You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. We remind you that no recruitment decision is made solely on the basis of automated processing.

Finally, please note that in the event of a complaint regarding the protection of your Personal Data, you can also contact the supervisory authority in your country.