

## INFORMATION NOTE FOR CANDIDATES FOR RECRUITMENT (GDPR)

### I. Why an Information Note?

VISIBLE PATIENT, as the controller of your personal data, gives high priority to your privacy and is committed to protecting your personal data.

Through this Information Note, the Human Resources of VISIBLE PATIENT ("VP") would like to inform you about how your personal data is collected and processed. The purpose of this note is to ensure that the protection and management of your personal data is carried out appropriately and responsibly in compliance with the applicable legislation, in particular in accordance with the General Data Protection Regulation (hereinafter referred to as "the GDPR").

### II. What is meant by the processing of personal data within the meaning of the "GDPR"?

- **Personal data** is any information of any kind and regardless of its medium, which makes it possible to directly or indirectly identify a natural person. Thus, your last name, first name, photo, e-mail address and any other data necessary for the performance of your employment contract are considered as personal data.
- **Processing of personal data** is defined by any act of manipulation or use of personal data such as collection, use, recording, storage, communication, dissemination, modification, deletion or anonymization.

### III. Who is this Information Note for?

The present Information Note is intended for candidates who apply with VP.

### IV. Who is responsible for the processing of your personal data?

In accordance with the GDPR, VP acts as the controller for the processing of your personal data, i.e. it determines the purposes of processing your data and the means with which it processes them. In this sense, VP is responsible for processing and protecting your personal data in compliance with the legislation in force and more particularly in compliance with the GDPR.

The address of VISIBLE PATIENT is 8 rue Gustave Adolphe Hirn 67000 Strasbourg, France.

As required by the GDPR, VP has appointed a Data Protection Officer, more commonly known as a "DPO" (for Data Protection Officer), who can be contacted at the following address: [visiblepatient.dpo@mydata-trust.info](mailto:visiblepatient.dpo@mydata-trust.info).

**V. What data categories do we process about you?**

VP does only process relevant and strictly necessary data in terms of needs and purposes linked to recruitment:

- Identity data including first and last name.
- Contact data including email address, private mailing address, phone number.
- Professional data including CV, letter of motivation and interview assessment.

**VI. Why do we process your personal data? On what legal grounds do we process your data? How long do we keep them?**

<i>Purposes</i>	<i>Legal grounds</i>	<i>Retention period</i>
Recruitment and constitution of a recruitment pool	Precontractual measures for the processing of applications and interview management  Legitimate interest for VP to constitute a recruitment pool	2 years after the last contact for data of an unsuccessful candidate, unless the candidate requests human resources to delete it ( <a href="#">deliberation of the French National Centre for Data Processing, CNIL n° 02-017 on 21 March 2002</a> )

**VII. Who processes your personal data and who do we share it with?**

For the purposes stated above, your personal data may also be processed by our administration / finance department and department managers who are recruiting.

We are likely to disclose your personal data to any authority for which we are legally required to do so (e.g., tax authorities, social security services) as well as to external providers who may be involved in the recruitment process.

**VIII. Is your data transferred outside the EEA/EU?**

No personal data will be transferred outside the EEA.

**IX. What are the security measures taken by VP to protect your personal data?**

All necessary measures are taken in order to improve the accuracy and comprehensiveness of recorded data. Furthermore, technical and organizational measures are taken on a daily basis to ensure the accuracy and relevance of your personal data as well as to prevent any loss, damage and access, unauthorized modification or transfer.

## **X. What are your rights and how to exercise them?**

As a data subject, you have a number of rights regarding the processing of your personal data.

Subject to our legal obligations and a case-by-case analysis by our DPO, you have the possibility to exercise the following rights:

- Access right: you have the right to obtain confirmation that your personal data is processed by VP or not, and if need be, you can obtain precise information about the processing of your data. You also have the right to ask for a copy of all the information held about you.
- Right of rectification: you have the right to ask us to rectify, in particular by completing or modifying all or part of the information held about you.
- Right to erase ("right to be forgotten"): you have the right to ask us the deletion all the information we hold about you from our systems.
- Right to restriction of processing: you can ask us that some of your data is not processed. They are then said to be locked.
- Right to data portability: you can ask to recover your information under a structured format, commonly used and machine-readable, in order to be able to transfer other processing controllers.
- Opposition right: you can oppose the processing of your personal data.
- Right to withdraw your consent: If you have given your consent to data processing, you have the right (in the cases provided for by the GDPR) to withdraw it at any time without, however, affecting the lawfulness of the processing for which you want to remove it.

If you want to exercise one of your rights, you can contact the **Human Resources** department ([rh@visiblepatient.com](mailto:rh@visiblepatient.com)) of VP by justifying your identity and clearly indicating the right(s) you want to exercise. Please note that these rights are not absolute. They shall always be subject to a case-by-case analysis by our DPO whom you can also directly contact ([visiblepatient.dpo@mydata-trust.info](mailto:visiblepatient.dpo@mydata-trust.info)) for any question or request.

You also have the right to lodge a complaint with the Data Protection Authority of the Member State of the European Union of your habitual residence, your place of work or the alleged infringement if you believe that your personal data is not being processed in accordance with the GDPR.

You can find the contact details of the various European Data Protection Authorities via the following link: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

*The present Information Note enters into force on 06/09/2021.*

*Latest update: 03/09/2021*

*This document may need to evolve according to the needs for proper functioning or for changes in legal requirements. The latest version is available upon request to the Human Resources department.*