

## PRIVACY POLICY

### General purposes and objectives

At DO Recruitment Advisors we take our responsibility regarding the security of your personal information and our obligations regarding the Reg. 2016/679 (called hereafter "GDPR") very seriously. We have updated our privacy policy because our commitment is to protect the privacy of our candidates, clients and users.

We strive to be transparent and clear about how we collect and use your information, to keep your information secure and to provide you with meaningful choices. This Privacy Policy is meant to help you understand what information DO Recruitment Advisors collect, why we collect it, what we do with it and how you can manage it. This policy applies for websites, apps, advertising services, products, services or technologies. We will ensure that the personal information you submit to us via our website or through our office is only used for the purposes set out in this policy.

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

The Data Controller (hereinafter referred to as “DO Recruitment Advisors” or “we”) in the sense of the GDPR and other national data protection laws of the member states as well as other data protection regulations is:

DO Recruitment Advisors  
Address: 1, rue Jean-Pierre Brasseur  
L-1258 Luxembourg

Our data protection officer is: Ms. Marine Repelowicz

## **How we collect personal information and what kind of information**

We may collect and combine various information during the course of our job focusing on recruitment / HR activity.

## **Services available without registration**

You may use most of the options that are available on our website without registration. You can browse our jobs, read our tips and advice that are published on our website. We don't store any data about you or your activity on our website.

## **Registration**

If you want to take the next step and apply for a position and send your application, we will collect and store your information. Through your application and sending your CV, an agreement on a contractual basis is built between you and DO Recruitment Advisors (Art 6 1. b) GDPR).

When you create an application or when you send your CV or manifest any interest in our services, we will use this information only for recruitment purposes.

We may collect the information that you provide to us, such as:

- Personal Data: name, phone number, job, salary, position, date and place of birth... etc.
- All information related to your career, job, salary expectations, CV...etc.

It is not our objective to collect sensitive data such as political opinions, religion, race...etc. Theoretically, it could only happen if we had to recruit for the public sector or any sector needing sensitive information that would be key to the business activity. In this case, this information has a specific protection regarding the GDPR (article 9)

## Other ways

We collect information from a variety of sources. When you or an authorised source publicly release information about your Personal Data on social media, press etc. we can use it in accordance with GDPR. We collect public information about you, such as professional-related news and accomplishments (e.g., patents granted, professional recognition, conference speakers, projects, etc.) and make it available for our clients to complete your profile.

## Why we use the information we collect

As a recruiter we need a thorough understanding of your background, education and professional experience in order to screen and make a suitable match with the job opportunities that we are recruiting for. The more information we have on the candidate, the better our selection process will be.

We may also use your data:

- To contact you for other job opportunities, etc...
- To communicate with you, answer your questions or comments, provide you with updates and news or alert you to the publication of a job offer corresponding to your profile (if you have submitted your cv).
- To execute our contract or the pre-contractual phase of the contract
- Personal Data may also be used in the compilation of our salary survey, whereby all data is treated in a confidential manner. The salary survey is given to our candidates & clients free of charge, as a reference tool to support the recruitment process. In this case, the Personal Data will be anonymous.

## How we process your personal information

We may contact you without any solicitation from your side. In this case when we initiate the contact / active soliciting and prior to registering your Personal Data, we will ask you if you are in agreement for this transfer of data. The legal basis in this case is the Article 6 (1) a) (**Consent**)

If the processing of Personal Data is necessary for the drawing up of a **contract** to which the data subject “you” is a party, Art. 6 (1) (b) GDPR will be the legal basis. This also applies to processing operations required to carry out pre-contractual actions.

As already explained, we consider that we have entered into a contract with you once you have initiated the contact and made the application to our company.

If processing of Personal Data is required to fulfil a **legal obligation** that our company is subject to, Art. 6 (1) (c) GDPR is the legal basis.

If processing is necessary to safeguard the legitimate interests of our company or a third party, and if the interests, fundamental rights, and freedoms of the data subject do not prevail over the first interest, Art. 6 (1) (f) GDPR is the legal basis for processing.

In few words :

- **Direct approach – “Headhunting”** Prior to us sending your CV to any third party, we will require your consent.
- **Application for a specific/speculative position**, we will enter into a contractual relationship.

### How we share this information

DO Recruitment Advisors collects Personal Data only for the purposes described above, by providing recruitment services. We do not sell, license or share information that individually identifies our customers / clients / applicants...etc. with companies, organisations or individuals outside of our firm and organisation unless one of the following circumstances applies:

- **Employees of DO Recruitment Advisors.** Information will be shared within the company and each employee of the company is obliged to respect privacy and data protection obligations.
- **With Partners.** We may share your information with non-affiliated companies who are:
  - **Trusted Partners.** We provide user information to trusted partners who work on behalf of and in compliance with appropriate confidentiality measures as foreseen in the GDPR (Regulation 2016/619) and its related legislation
  - **Advertising, Analytics and Business Partners (Limited to Non-Personally Identifiable Information).** We may share aggregated or anonymous information with partners, such as publishers, advertisers, measurement analytics, apps, or other companies. We do not share information that personally identifies you (personally identifiable information is information like name or email address or any other identifying information) with these partners.
  - **For Legal and Other Purposes.** We may access, preserve and disclose information to investigate, prevent, or take action in connection with: (i) legal process and legal requests; (ii) enforcement of the Terms; (iii) claims that any content violates the rights of third-parties; (iv) requests for customer service; (v) technical issues; (vi) protecting the rights, property or personal safety of Oath, its users or the public; (vii) establishing or exercising our legal rights or defending against legal claims; or (viii) as otherwise required by law. This may include responding to lawful governmental requests.
  - **Service providers:** We use the support of external providers to help operate our business (e.g., maintenance, analysis, audit, payments, fraud detection, marketing and development). They may have access to your information within reason to perform these tasks on our behalf and are obliged not to disclose or use it for other purposes. We use data processors for hosting and securing our platforms, administrative, troubleshooting, and support services. These data processors will store the data for the same duration as defined in this Data Protection Policy.

### **How we protect your personal data**

DO Recruitment Advisors has technical, administrative and physical safeguards in place to help protect against unauthorised access, use or disclosure of customer information we collect or store.

### **Where we may/could transfer your Personal Data**

When you enter into contract with us, you consent to the data processing, sharing, transferring and uses of your information as outlined in this Privacy Policy. Regardless of the country where you reside, you authorise us to transfer, process, store and use your information in countries other than your own in accordance with this Privacy Policy.

We may process information related to individuals in the EU/EEA that submit to the GDPR. The same guarantee as in the EU should be guaranteed to you.

As of today, your data is stored in a datacentre based in France. We still ensure that our service provider respect the standards of the GDPR.

If we have to transfer your Personal Data into a non EU/EEA Country, we should collect your consent.

### **How long we store your Personal Data**

We store your Personal Data as long as necessary to provide the contractually agreed service. The Personal Data stored is available to you for the duration of the contract and will be stored by us for this period.

The Personal Data will be erased if you use your right to erasure or if the contract ends.

The maximum term for storage of data is 36 months without any contact. The purpose of retaining your CV for this period is for us to match it with other job opportunities arising in the future, which may fit with your long-term career objectives. We know that recruitment is not short-term and it is our objective to understand your career objectives and to contact you only when a suitable career opportunity opens.

### **How you can manage your Personal Data**

The GDPR gives you a full range of rights concerning the data you provided. If you would like to make a request for information, please contact [GDPR@dorecruit.com](mailto:GDPR@dorecruit.com)

### **Right of access**

You shall have the right to obtain from DO Recruitment Advisors confirmation as to whether we process Personal Data relating to you. If such processing is taking place, you can request the following information from us:

- a) The purposes of processing;
- b) The categories of Personal Data concerned;

- c) The recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) Where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;
- e) The existence of the right to request from the Data Controller rectification or erasure of Personal Data or restriction of processing of Personal Data concerning the data subject or to object to such processing;
- f) The right to lodge a complaint with a supervisory authority;
- g) Where the Personal Data are not collected from the data subject, any available information as to their source;
- h) The existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

You have the right to request information about whether the Personal Data in question will be transferred to a third country or an international organisation. In this context you can ask to be notified of the suitable safeguards in accordance with Art. 46 GDPR in the context of the transfer.

The Data Controller shall provide a copy of the Personal Data undergoing processing. For any further copies requested by the data subject, the Data Controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedom of others.

### **Right to rectification**

You shall have the right to obtain from the Data Controller without undue delay the rectification / completion of inaccurate/incomplete Personal Data concerning yourself.

### **Right to erasure**

#### **1. Erasure obligation**

You shall have the right to obtain from the Data Controller the erasure of your Personal Data without undue delay and the Data Controller shall have the obligation to erase Personal Data without undue delay where one of the following grounds applies:

- a) The Personal Data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) You withdraw consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
- c) You object to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21(2);
- d) The Personal Data have been unlawfully processed;

- e) The Personal Data have to be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject;
- f) The Personal Data has been collected in relation to the offer of information society services referred to in Article 8(1).

## **2. Public information**

If we have made the Personal Data public and are obliged pursuant to paragraph 1 to erase the Personal Data, the Data Controller (DO Recruitment Advisors), taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform Data Controllers which are processing the Personal Data that the Data Subject has requested the erasure by such Data Controllers of any links to, or copy or replication of this Personal Data.

## **3. Exceptions**

There is no right to erasure if the processing is:

- a ) For exercising the right of freedom of expression and information;
- b) Compliance / legal obligation which requires processing by the EU Member State law to which the Data Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- c) For reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- d) For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) For the establishment, exercise or defence of legal claims.

## **Right to restriction of processing**

If one the following conditions are met, you can request the **restriction** of the processing of your Personal Data :

1. The Data Subject shall have the right to obtain from the Data Controller restriction of processing where one of the following applies:
  - a) If you contest the accuracy of the personal data, for a period enabling the Data Controller to verify the accuracy of the Personal Data;
  - b) If the processing is unlawful and you oppose the erasure of the Personal Data and request the restriction of their use instead;
  - c) We no longer need your Personal Data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
  - d) You have objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the Data Controller override yours.

Where processing has been restricted, such Personal Data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

The Data Controller shall inform a Data Subject who has obtained restriction of processing before the restriction of processing is lifted.

We shall communicate any rectification or erasure of Personal Data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the Personal Data have been disclosed, unless this proves impossible or involves disproportionate effort. We shall inform you about those recipients if you request it.

### **Right to data portability**

You have the right to receive your Personal Data in a commonly used and machine-readable format and send it to another Data Controller

In this case :

- 1) The data processing is based on consent under Art. 6 (1) (a) GDPR or Art. 9 (2) (a) GDPR or on a contract pursuant to Art. 6 (1) (b) GDPR and
- (2) The processing is carried out by automated means.

Further, in exercising this right you also have the right to have the Personal Data concerning you transferred directly from one Data Controller to another Data Controller, where technically feasible.

This must not adversely affect other people's rights and freedom.

The right to data portability does not apply to the processing of Personal Data, which is required for a task that is performed in the public interest or in the exercises of official authority vested in us.

The right to data portability is strictly limited to the Personal Data you are providing to us. Any other Data we have collected and resulting from testing, references, ...etc. and not provided by you are DO Recruitment Advisors' property. If you want to use your portability right, this additional Data will be deleted or made anonymous for statistical purposes or other.

### **Right to object**

You have the right to object, on grounds relating to his or her particular situation, at any time to the processing of your Personal Data which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. In this case, we have to demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where Personal Data is processed for direct marketing purposes, you have the right to object at any time to the processing of your Personal Data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where you object to processing for direct marketing purposes, we no longer process these purposes.

At the latest at the time of the first communication with you, we brought to your attention this specific right.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

Where Personal Data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), you, on grounds relating to your particular situation, have the right to object to processing of your personal data, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

#### **Automated individual decision-making, including profiling**

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects on you or similarly significantly affects you.

This does not apply if:

- a) it is necessary for entering into, or the drawing up of, a contract between us
- b) it is authorised by Union or Member State law to which the Data Controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- c) it is based on your explicit consent.

To achieve the paragraph above, we have to implement suitable measures to safeguard your rights and freedom and legitimate interest, at least the right to offer a human intervention from our side to present your own point of view, and to challenge a decision.

#### **Other Important Information**

If you continue using our services from 25<sup>th</sup> May 2018, this means you agree to these updates. If you do not agree to these updates, we can delete your account. Please send an email to [GDPR@dorerecruit.com](mailto:GDPR@dorerecruit.com).

#### **Changes to our Privacy Policy**

This Privacy Policy may be changed by DO Recruitment Advisors at any time. If we change our Privacy Policy in the future, we will advise you of changes or updates to our Privacy Policy by a prominent notice on our website. Continued use of this website or our services after such changes will constitute your acceptance of such changes.

If, at any time, you have questions or concerns about DO Recruitment Advisors' online privacy commitment, please feel free to e-mail us at [GDPR@dorecruit.com](mailto:GDPR@dorecruit.com).



## **Questions & Suggestions**

If you have any questions or suggestions you can contact us at : [GDPR@dorecruit.com](mailto:GDPR@dorecruit.com).