

# VERMEG Privacy Statement for recruitment

The VERMEG Group (and its subsidiaries, called “VERMEG”) is an international organization active on every continent (see also [www.vermeg.com](http://www.vermeg.com)). VERMEG undertakes to protect the privacy of internal and external candidates. When a candidate visits VERMEG’s Internet site, VERMEG collects information (personal data) about the candidate (for instance from online forms).

The protection of the privacy and personal data of candidates is of the utmost importance to VERMEG, and represents an important aspect of how VERMEG creates, organizes and implements its recruitment activities.

Please read the present Privacy Statement carefully. It explains why and how we collect information concerning you, how we protect those data and for how long we keep them. We will store your data as safely and securely as possible against loss and unauthorized disclosure or access, and we will process your personal data strictly in accordance with the applicable laws on the protection of personal data, in particular the General Data Protection Regulation 2016/679 of 27 April 2016 (‘GDPR’).

**This Statement is written in question and answer format.**

## 1. Who will process my personal data?

The controller of your personal data is the legal entity of the VERMEG group, hereinafter referred to as “VERMEG”, conducting the recruitment procedure:

- VERMEG BELGIUM SA, with registered office at 1000 Brussels, boulevard du Régent 37-40, and with company registration number 0456.861.783;
- VERMEG INTERNATIONAL SA, with registered office at 1000 Brussels, boulevard du Régent 37-40, and with company registration number 0474.800.251;
- VERMEG Luxembourg SA, with registered office at L-1311-Luxembourg-Merl, boulevard Marcel Cahen 52, and registered in the Trade and Companies Register under number B56277;
- SOLFIA SA, with registered office at L-1311-Luxembourg-Merl, boulevard Marcel Cahen 52, and registered in the Trade and Companies Register under number B161222;
- VERMEG France SA, with registered office at 75002 Paris, rue du Quatre septembre 16, and with company registration number 438.549.644;

- VERMEG SERVICES FOR INSURANCE SA, with registered office at 75002 Paris, rue du Quatre septembre 16, and with company registration number 832.415.053;
- VERMEG SOFTWARE SPAIN S.L., with registered office at 28020-Madrid, calle Orense 85, Edificio Lexington, and with tax identification number (N.I.F.) B-87-833844;
- VERMEG MEDIA, with registered office at 1053 Tunis, rue Lac Biwa, les Berges du Lac, and with company registration number B2477432008.

## 2. For what purpose, and on what legal basis, will my personal data be processed?

The purpose for which your personal data will be processed is the registration of your application for a position in our company, and if this application initiates our selection procedure, we will draw up your profile, which means that VERMEG will process all data that will be necessary for us to be able to assess your application with a view to potential recruitment.

The processing of your data is therefore necessary for us to be able to take measures prior to the conclusion of an employment contract, and is in the legitimate interest of VERMEG, namely that of assessing your professional ability to hold a position in our company.

If we find that you are suitable for the position in question and we decide to hire you, we will also use your personal data to draw up an employment contract.

Conversely, if we turn down your application, we will keep your personal data for a specified period (see point 7) so that we may contact you if any future opportunities should come up that fit your profile. This is also in the legitimate interest of VERMEG.

## 3. What categories of personal data concerning you will be processed?

Personal data includes all information concerning you and by which you can be identified. Anonymous data, which cannot identify you, are therefore not considered as personal data. VERMEG processes only personal data that are adequate, relevant and limited to what is necessary in relation to the purpose(s) for which they are processed.

VERMEG collects and processes (required and optional) data provided directly by the candidate from the forms and CVs found on the website of VERMEG with URL [www.vermeg.com](http://www.vermeg.com). VERMEG also collects and processes personal data concerning the candidate that are obtained from personal contacts, telephone calls or email messages.

In order to achieve the above-mentioned objectives, the personal data being processed will include the following:

- standard data relating to your identity (name, first name(s), address, etc.);
- personal data (date and place of birth, nationality, gender, telephone number, email address, hobbies and interests, etc.);
- your photo, if you choose to send us one;
- information concerning your professional experience (profile, details of previous employers, termination of previous jobs and work done, special projects, etc.), including checking of references where you have provided those in your CV (which means that you have agreed to our contacting those references);
- information concerning your training (degrees, certificates, internships, special training programmes, etc.);
- language skills;
- where appropriate, whether you have a work and/or residence permit for the European Economic Area (EEA);
- any other personal data which you communicate to us during your application with regard to the position;
- digital assessment over the Internet (presence in social networks), insofar as we have access to that presence;
- any other personal data (other than those mentioned above) that need to be processed in pursuance of the law.

VERMEG does not collect or process any sensitive data concerning the candidate, such as data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life. If due to special circumstances VERMEG collects sensitive data concerning candidates, the candidate will be asked to give his or her express consent first.

Please note that candidates will be notified if they communicate unsolicited sensitive data to VERMEG. Failing the express consent of the person concerned to the processing of those data for recruitment purposes, the data in question will be deleted within one month.

## 4. Who will have access to my personal data?

The Human Resources department and your prospective line manager(s) will have access to your personal data on a strict need-to-know basis for the purposes of achieving the above-mentioned objectives.

We will not transmit those data to other third parties. Nevertheless, an exception may be made for assessment centres or any other third parties relevant to the recruitment process (e.g. a third party to which we are bound by a non-poaching clause).

VERMEG will ask your consent before transmitting data to any third party.

VERMEG does not sell or trade in personal data of candidates to third parties. VERMEG may be required to disclose certain data concerning candidates to third parties, such as public authorities, in accordance with the applicable laws. VERMEG may also need to disclose data concerning candidates in order to safeguard the rights of VERMEG, in accordance with the applicable law.

## 5. Will my personal data be transferred outside my country of residence?

Candidates can apply online (spontaneous applications as well as current vacancies at VERMEG) on the website of VERMEG ([www.vermeg.com](http://www.vermeg.com)). Candidates may indicate their preference for a particular country during the online application process. If a candidate decides to apply for a position outside his home country, his application details will be transferred to the country of the desired position. The application details are transferred solely for the purposes of recruitment and selection. By agreeing with this privacy statement for recruitment of VERMEG, the candidates consent to the transfer of their application details and to the fact that VERMEG's staff recruitment officers across the world may contact them for recruitment purposes.

In order to operate on an international level and to promote the career of candidates within VERMEG, it is necessary to be able to process and transfer the personal data of candidates in the context of VERMEG's international operations. The data of candidates will be entered in an international database which can be accessed by VERMEG's recruitment officers from the different countries where VERMEG is based. The use of this database will involve the transfer of the candidate's personal data outside his or her home country. By agreeing with this privacy statement for recruitment of VERMEG, the candidates consent to the transfer of their application details (for processing by VERMEG's staff recruitment officers across the world) to the different countries where VERMEG is based, namely Belgium, France, Luxembourg, Spain, and Tunisia.

VERMEG has implemented appropriate guarantees in order to comply with the GDPR in connection with the transfer and processing of personal data of candidates to the various countries where VERMEG is based (possibly in a country outside the European Economic Area: Tunisia). More particularly, VERMEG provides for the application, with every member of the VERMEG Group concerned, of the standard contractual clauses relating to data protection adopted by the European Commission.

## 6. Will VERMEG make use of an automated decision-making process?

Automated decisions are defined as decisions relating to individuals which are made solely on the basis of automated data processing and which entail legal consequences, or which affect the individuals concerned in a significant way.

As a matter of principle, VERMEG does not make automated decisions as described above. VERMEG does not base its decision whether or not to hire you solely on the basis of automated data processing.

## 7. How long will my personal data be kept?

We will keep your personal data only for as long as is necessary for the purposes described above. VERMEG will only retain the personal data of candidates after the recruitment and selection process if there is a legal obligation (for example equal opportunity requirements under national law), or if the company needs to keep the candidate's personal data, for example keeping a candidate's CV if a suitable job offer comes up.

If the application does not result in an employment relationship, we will keep your personal data for a period of up to two years after the end of the application procedure, for the purposes described in point 2 above.

## 8. Security

VERMEG takes technical, physical and organizational security measures to ensure the integrity, confidentiality and availability of the personal data of candidates. VERMEG has implemented security techniques to protect the stored personal data of candidates against unauthorized access, improper use, alteration, unlawful or accidental destruction, and accidental loss. Only staff members of VERMEG involved in VERMEG's recruitment activities have access to the personal data. The staff of VERMEG who have access to the personal data of candidates are obliged to respect the privacy of candidates who visit the website of VERMEG and the confidentiality of the candidates' personal data. VERMEG guarantees a sufficient level of security for the manual and electronic processing of the candidates' personal data and to prevent their improper use, in accordance with the applicable local requirements. VERMEG also (contractually) guarantees that third parties and subsidiaries that process personal data of the

candidates on behalf of VERMEG will observe similar security measures, also in accordance with the local requirements.

## 9. What are my rights with regard to the processing of my personal data by VERMEG, and who can I contact?

You may contact VERMEG at any time if you need any kind of support when you submit your application, or for the management of your personal data. You also have the right to contact VERMEG at any time with the following requests:

- Access to, rectification or erasure of your personal data;
- Restriction of processing of your personal data;
- Withdrawal of your consent to the processing or transfer of your personal data based on consent (however, this shall not affect the lawfulness of earlier processing);
- Receipt of your data for transmission to another data controller (“right to data portability”);
- Right to object: you may object to any processing of personal data concerning you when your personal data are processed on grounds of the legitimate interest pursued by VERMEG;
- Right to lodge a complaint with the supervisory authority if you believe that VERMEG has not acted in accordance with the law on data protection.

Please address all inquiries, comments or issues concerning the present statement or the collection and processing of candidates’ personal data to the Data Protection Officer of VERMEG by sending a email message and a copy of your identity card or passport to this email address: [dpo@vermeg.com](mailto:dpo@vermeg.com).

Please note that this contact address may only be used for inquiries relating to privacy. Any information or other questions not connected with privacy matters will not be replied to.

## 10. Modification

We may modify the present Privacy Statement at any time in order to comply with the law or to reflect the development of the business. Where appropriate, this will happen in accordance with the limitations imposed by the applicable regulations on privacy and data protection, and we will inform you of any changes that are made.

## 11. Acknowledgement

By submitting my application, I acknowledge having read and understood this Privacy Statement, and I agree with its contents.