

SQLI DIGITAL EXPERIENCE

CANDIDATE PRIVACY POLICY

SQLI ("**SQLI**") considers that the protection of your personal data and the respect of your privacy are key issues to which it intends to pay particular attention.

This privacy policy (hereinafter the "**Policy**") is intended to inform you about the processing of your personal data in connection with your recruitment at SQLI.

SQLI, a public limited company (société anonyme), whose registered name is SQLI SA and whose head office is located at 166 rue Jules Guesde 92300 Levallois-Perret, registered in the Nanterre Trade and Companies Register under number RCS 353 861 909, is responsible for processing your personal data (hereinafter referred to as "**we**", "**us**", "**our**").

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WHAT PERSONAL DATA DO WE COLLECT?

As part of your application to one of the job position offered by SQLI :

- identification data, data relating to your academic background (degrees, courses of study, previous grades, if any), your professional experience, and other information contained in your Curriculum Vitae ("**CV**"). This information is transmitted (i) directly by you or (ii) indirectly via the third-party online application software accessible via our website.
- data relating to the technical test carried out as part of the recruitment procedure.
- data and other information contained in the notes taken by SQLI recruitment managers during your individual interview, as well as the date of the individual interview.
- information as to the outcome of your application and contract, if any.

As part of the (i) memorialization of your contract; and (ii) our management and coordination of your onboarding within SQLI :

- identification data:
 - name
 - first name

- gender
- nationality
- date of birth
- department of birth
- city of birth
- photography
- copy of national identity card
- communication data:
 - e-mail address
 - postal address
 - phone number
 - contact details for emergency contacts, where available
- social security data:
 - social regime
 - social security number
 - registration on the list of top-level athletes, coaches, referees and judges
- health data:
 - recognition of disabled worker status when you decide to declare it
- data relating to the candidate's professional situation:
 - information on professional integration
 - subsequent professional experience
 - salary level range
 - status as an employee
- any personal data contained in any correspondence you may send us.

In some cases, the communication of your personal data is compulsory as it is necessary to provide the services you request from SQLI. In each case, we will inform you of the mandatory or optional nature of the communication of your personal data.

Furthermore, should you be required to provide us with personal data of third parties, you undertake to ensure that such persons have been duly informed of the processing of their personal data in accordance with this Policy and have consented to the processing of their personal data whenever such consent is required by law.

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WHY DO WE USE YOUR PERSONAL DATA?

The table below shows the purposes for which we process your personal data and, for each of them, the legal basis that legitimizes the processing in question:

PURPOSE		LEGAL BASIS	CATEGORIES OF DATA CONCERNED
Managing your application as part of the recruitment process	Review and selection by SQLI recruitment managers of application files transmitted (i) indirectly via our third-party software; or (ii) directly by you	Processing is necessary for pre-contractual measures	<ul style="list-style-type: none"> • identification data • communication data • Previous training and professional experience • any data contained in the correspondence
	Selection process		
	Notification of acceptance or rejection of your application		
Contract management	Memorializing and signing the contract between you and SQLI	Processing is necessary for the performance of the contract and is carried out in accordance with legal and regulatory provisions.	<ul style="list-style-type: none"> • identification data • data concerning the social security system • disabled worker status when you decide to declare it • previous training and professional experience

PURPOSE		LEGAL BASIS	CATEGORIES OF DATA CONCERNED
			<ul style="list-style-type: none"> • data relating to the performance of your contract with SQLI
Handling of any potential or actual disputes with you or others third party	Preparation, exercise and follow-up of a disciplinary or legal action or the enforcement of a court decision	Processing is carried out based on our legitimate interest to defend our interests, including through legal action	<ul style="list-style-type: none"> • identification data • any data contained in the correspondence • facts, nature of the dispute, and follow-up of the procedure

In any event, please note that we will not process your personal data for any other purposes that are incompatible with those mentioned above.

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WITH WHOM DO WE SHARE YOUR DATA

We may communicate your personal data to the following categories of recipients:

- our internal departments responsible for managing and selecting your applications, as well as recruitment managers (i.e. HRBP) for the proper management and monitoring of your contract;
- customers for whom you may be called upon to intervene within the framework of your contract;
- to our IT service providers via tools and other digitized services enabling us to effectively achieve the purposes pursued under this Policy, including for the hosting and secure storage of your personal data within the European Economic Area (**EEA**);
- competent courts, law enforcement agencies, public authorities, government agencies and public entities, where applicable.

Regardless of the recipient, we will only disclose your personal data on a strictly need-to-know basis and only to the extent necessary to achieve the purposes identified in this Policy.

We do not sell your personal data.

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DO WE TRANSFER DATA OUTSIDE THE EEA?

We do not transfer your personal data outside the EEA.

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**HOW LONG DO WE KEEP YOUR PERSONAL DATA?
PERSONAL CHARACTER?**

We keep your personal data for no longer than is necessary for the purposes of the processing concerned.

In other words, this means that the retention periods we apply vary according to the purpose for which we process the data in question. The table below shows how long your personal data will be kept for each purpose:

PURPOSE	CATEGORIES OF DATA	DATA RETENTION PERIOD
<p>Managing your application as part of the recruitment process</p>	<ul style="list-style-type: none"> • identification data • communication data • information on your previous training and professional experience • any data contained in the correspondence 	<p>Up to three (3) months after completion of the admission procedure.</p> <p>If your application was not successful and provided you consent, for a period not to exceed one (1) year from the last contact with you.</p> <p>At the end of this two (2) year period, SQLI may ask you to consent again to the storage of your data for a reasonable period and for a maximum of one (1) year.</p>
<p>Contract management</p>	<ul style="list-style-type: none"> • identification data • data concerning the social security system • disabled worker status if you decide to declare it • previous training and professional experience <ul style="list-style-type: none"> • data relating to the execution of your contract with SQLI 	<p>The data collected within the framework of the contract will be kept for the duration of your employment and maximum period of five (5) years from the date of the said termination of the contract and/or so long as there is a legitimate grounds such as disability.</p>
<p>Manage any potential or actual disputes with you or third parties</p>	<ul style="list-style-type: none"> • identification data • any data contained in the correspondence 	<p>We will retain your personal data until the expiry of all applicable appellate proceedings.</p>

We also defined an archiving policy. This ensures that your personal data is not kept in an active database unnecessarily.

In any event, once the applicable retention period has expired, we will irrevocably delete or anonymize your personal data so that you can no longer be identified.

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WHAT RIGHTS DO YOU HAVE?

Pursuant to the legal framework applicable to data protection, and in particular the GDPR, you have the following rights: right of access, rectification, erasure, opposition, limitation of processing, portability of your personal data and the right to give instructions regarding the fate of your personal data after your death.

Where the processing of your personal data is based on your consent, you may withdraw it at any time.

- **Right of access**

You may request access to your personal data at any time. If you exercise your right of access, we will send you a copy of the data in our possession, together with all information relating to its processing.

- **Right of rectification**

You have the right to ask us to rectify or complete any inaccurate or incomplete personal data in our possession.

- **Right to erasure**

You have the right to ask us to delete your personal data, for example if it is no longer required for any relevant processing.

We will do our best to comply with your request. Please note, however, that we may be obliged to retain all or part of your personal data if we are required to do so by law or if such data is necessary for the establishment, exercise or defense of our legal rights.

- **Right to object**

You may object at any time to the processing of your personal data by SQLI. We will then cease processing your personal data unless there are compelling legitimate grounds for us to continue processing your personal data (for example, if your data is necessary to establish, exercise or defend our rights or the rights of third parties in a court of law). If we are unable to comply with your objection, we will inform you of the reasons for our refusal.

- **Right to limit**

You may also request that we restrict the processing of your personal data. For example, if you dispute the accuracy of your personal data or object to its processing, you may also request that we do not process your data for the time necessary to verify and investigate your claims.

In this case, we will temporarily refrain from processing your personal data until the necessary verifications have been carried out or until we comply with your requests.

- **Right to portability**

You may request the portability of your personal data. If you so request, we will provide you with your personal data in a readable and structured format that enables you to re-use it easily.

We would like to draw your attention to the fact that the portability of your personal data applies only to the personal data that you have communicated to us, provided that the communication of your personal data does not infringe the rights of third parties. If we are unable to comply with your request, we will inform you of the reasons for our refusal.

- **Right to withdraw your consent**

Where the processing of your personal data is based on your consent, you may withdraw it at any time. Withdrawal of your consent prevents us from processing your personal data, but does not affect the lawfulness of any processing carried out prior to such withdrawal.

- **Right to specify instructions for the use of your personal data after your death**

You can give us instructions on how to use your personal data after your death. For example, you can ask us to store, delete or pass on your personal data to a third party designated by you.

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HOW TO EXERCISE YOUR RIGHTS

To exercise your rights, please contact our dedicated department using the contact details given in Section 8 (*How can you contact us?*). To process your request as efficiently as possible, we may ask you for certain additional information to confirm your identity and/or facilitate the location of the personal data concerned by your request.

Please note that some of these rights are subject to specific conditions dictated by the applicable data protection legal framework. If your particular situation does not meet these conditions, we will unfortunately be unable to process your request. We will inform you of the reasons for our refusal.

In any event, please note that you may lodge a complaint with the Federal Commissioner for Data Protection and Freedom of Information ("**BfDI**").

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HOW CAN YOU CONTACT US?

If you have any questions or requests concerning the processing we carry out with your personal data under this Policy, including the exercise of your rights, as detailed above, you can contact us, by email at the following address: privacy@sqli.com or by mail, at the following address: SQLI, Direction Juridique Groupe, 166 rue Jules Guesde 92300 Levallois-Perret, France.

Date of last update: June 22, 2023