

# SQLI DIGITAL EXPERIENCE

## PRIVACY NOTICE APPLICANTS

SQLI Spain ("**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 "**Notice**") is intended to inform you about the processing of your personal data when you apply for one or more job vacancies offered by SQLI ("**you**" or the "**Data Subject(s)**").

SQLI Spain, whose registered office is located Constitucio 3, 2nd Floor, 08960 Barcelona, Spain is responsible for processing your personal data, is responsible for processing your personal data (hereinafter "**we**", "**us**", "**our**").

### 1. What personal data do we collect?

Within the framework of the recruitment procedure and the examination of your application for one of the jobs offers proposed by SQLI, we process the following categories of personal data:

- **Identification data:** surname, first name, contact details (personal and business e-mail and telephone), date of birth and any other personal data contained in your resume ("**Resume**").
- **Administrative data:** confirmation of EU work permits and citizenship to the extent authorized by law.
- **Data relating to your academic and professional background:** diplomas, courses of study, previous grades, if any, professional experience, current salary and salary expectations, and any other personal data contained in your Resume.
- **Data relating to your personal life** (i.e. data relating to your personal life, as it appears on your Resume or which you spontaneously communicate in your exchanges with us, such as your hobbies or marital status).
- **Economic data** (e.g. your current salary and salary expectations, etc.).
- **Health-related data:** this will be the only information you voluntarily give us about a possible disability).
- **Data relating to the technical and/or personality test(s)** carried out as part of the recruitment procedure.
- **Data relating to the notes taken by SQLI recruitment managers** during your personal interview, as well as the date of the interview.
- **Information as to the outcome of your application.**
- **Any personal data contained in any correspondence** you send to us.

- **Data relating to any disputed facts**, characteristics of the dispute, comments relating to the description and follow-up of the procedure.

In most cases, the communication of your personal data is compulsory, otherwise we will not be able to process your application properly. For example, if you refuse to provide us with the information reasonably required concerning your qualifications and professional experience, we will not be able to determine whether your profile meets the requirements of the position, and we will have to reject your application.

In any case, we will inform you when the communication of your personal data is compulsory.

We would also like to draw your attention to the fact that data relating to your health, your membership in a trade union or your political opinions are considered "sensitive" data within the meaning of the legal framework applicable to the protection of personal data. We will not spontaneously seek to obtain this type of data from you. However, in a limited number of cases, you may spontaneously provide us with such information. For example, in the case of data relating to your health, so that we can check that the job you are interested in can be adapted to your needs if you have a disability.

Such data will only be processed to the extent strictly permitted and necessary by law, to the exclusion of any other incompatible purpose. Specific measures will also be taken to ensure that the processing of such data is limited to the strict minimum.

In addition, should you provide the personal data of third parties (such as contact details of persons with whom we can verify your references), you undertake to ensure that such persons have been duly informed of the processing of their personal data in accordance with this Notice and, if required, have consented to the processing of their personal data.

## 2. How do we collect your personal data?

SQLI collects candidates' personal data in the following ways:

- **Directly from the candidate:**
  - When the candidate submits his/her application to SQLI; and
  - When the applicant sends specific requests to SQLI.
- **From third parties:**
  - Recruitment or temporary employment agencies.
  - Former employers for reference purposes, where applicable.
  - Educational and vocational verification agents (only if authorized by applicable regulations); and
  - Public authorities, where applicable.
- **From public sources**, such as public information published by the candidate on open professional social networks like LinkedIn.

### 3. Why do we use your personal data?

The table below shows the purposes for which SQLI processes your personal data and, for each of them, the legal basis for the processing in question:

PROCESSING ACTIVITIES	PURPOSE	LEGAL BASES	CATEGORIES OF DATA CONCERNED
<b>Examination of your application as part of the recruitment process</b>	The recruitment managers of SQLI review and select applications.	<ul style="list-style-type: none"> <li>• Execution of pre-contractual measures when the application is initiated by the applicant.</li> <li>• SQLI's legitimate interest in recruiting suitable candidates for open positions.</li> </ul>	<ul style="list-style-type: none"> <li>• identification data</li> <li>• administrative data</li> <li>• information about your academic and professional background.</li> <li>• data relating to your personal situation; and</li> <li>• personal data contained in correspondence.</li> </ul>
	Organization of tests and interviews.		<ul style="list-style-type: none"> <li>• identification data ;</li> <li>• information about your academic and professional background.</li> <li>• data relating to technical and/or personality test(s).</li> <li>• data relating to the notetaking of SQLI recruitment managers.</li> <li>• data relating to your personal situation; and</li> <li>• personal data contained in correspondence.</li> </ul>
	Communication of acceptance or rejection of your application.		<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• information on the outcome of your application.</li> </ul>
	If your application is unsuccessful, we will keep your profile in a pool of candidates (so that we can offer you future opportunities that may be of interest to you) and, if	<ul style="list-style-type: none"> <li>• SQLI's legitimate interest in simplifying and improving the recruitment process.</li> </ul>	<ul style="list-style-type: none"> <li>• identification data.</li> <li>• information about your academic and professional background.</li> <li>• data relating to technical and/or personality test(s).</li> </ul>

	necessary, share your profile with other SQLI entities that may offer opportunities corresponding to your expectations.	<ul style="list-style-type: none"> <li>If data relating to your health or your membership in a trade union organization is processed in this context, the legal basis for such processing will be your consent, given freely and voluntarily by you.</li> </ul>	<ul style="list-style-type: none"> <li>note-taking data for recruiters.</li> <li>information as to the outcome of your application.</li> <li>information about your current professional situation; and</li> <li>personal data contained in correspondence.</li> </ul>
<b>Management of any potential or actual disputes with you or third parties</b>	Preparation, exercise and follow-up of a legal action or the enforcement of a court decision.	<ul style="list-style-type: none"> <li>SQLI's legitimate interest in defending its rights and interests, including through legal action.</li> </ul>	<ul style="list-style-type: none"> <li>identification data ;</li> <li>information about your professional situation;</li> <li>personal data contained in correspondence; and</li> <li>data relating to any disputed facts.</li> </ul>

If your application is successful, we may need to collect and process additional personal data to formalize and sign your employment contract. These processing operations are detailed in the employee's Privacy Notice, which will be communicated to you at that time.

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

#### 4. With whom do we share your personal data?

As part of our processing operations, we may communicate your personal data to the following categories of recipients:

- the third-party application management service **SmartRecruiters**, whose privacy notice is available here: <https://www.smartrecruiters.com/fr/legal/general-privacy-policy/> ;
- our internal departments responsible for processing and selecting your applications, as well as recruitment managers (i.e. Human Resources Business Partner, Human Resources Team Leader);
- our IT service providers via the tools and other digitized services enabling us to achieve the purposes pursued under this Notice, including for the hosting and secure storage of your personal data within the European Economic Area (**EEA**); and

- 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 required to achieve the purposes identified in this Notice.

We do not sell your personal data.

## 5. Do we transfer personal data outside the European Economic Area (EEA)?

In the context of SQLI's international activity, certain personal data of Data Subjects may be transferred to and processed by other entities, outside the EEA.

SQLI transfers personal data to countries that are not recognized by the European Commission as ensuring an adequate level of data protection, namely:

- **Morocco**

In this context, SQLI ensures that the level of protection afforded to personal data is not adversely affected by such transfers, whether to entities within the group to which SQLI belongs or to recipients outside the group.

In any case, transfers to entities outside SQLI are based *at least on* one of the following transfer mechanisms:

- the existence of an adequacy decision issued by the European Commission for the country to which your personal data is transferred; or
- the conclusion of standard contractual clauses reproducing the models adopted by the European Commission; or
- the existence of an exception related to one of the specific situations exhaustively provided for by the General Data Protection Regulation n°2016/679 ("**GDPR**"), for example, when you have given your consent to this transfer having been informed of the absence of guarantees, when the transfer is necessary for the performance of a contract entered into between you and us, when the transfer is necessary for the conclusion or performance of a contract entered into, to your benefit, between us and a third party, or when the transfer is necessary for the establishment, exercise, or defense of our legal rights, etc.

You can obtain copies of these documents by sending an e-mail to the following address:

[privacy@sqli.com](mailto:privacy@sqli.com) and / or [dataprotection.spain@sqli.com](mailto:dataprotection.spain@sqli.com)

## 6. How long do we keep your personal data?

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 personal data retention periods we apply vary according to the purpose for which SQLI processes the data in question. The table below shows how long your personal data will be kept for each purpose:

PURPOSE	DATA CATEGORY	RETENTION SCHEDULE
<p><b>Review and selection of applications by SQLI recruitment managers</b></p>	<ul style="list-style-type: none"> <li>• identification data.</li> <li>• Administrative data.</li> <li>• information about your academic and professional background.</li> <li>• data relating to your personal situation; and</li> <li>• personal data contained in correspondence.</li> </ul>	<p>Until the end of the recruitment process in question.</p>
<p><b>Organization of tests and interviews</b></p>	<ul style="list-style-type: none"> <li>• identification data.</li> <li>• information about your academic and professional background.</li> <li>• data relating to technical and/or personality test(s).</li> <li>• data relating to the notetaking of SQLI recruitment managers.</li> <li>• data relating to your personal situation; and</li> <li>• personal data contained in correspondence.</li> </ul>	
<p><b>Notification of acceptance or rejection of your application</b></p>	<ul style="list-style-type: none"> <li>• identification data ; and</li> <li>• information on the outcome of your application.</li> </ul>	
<p><b>If your application is unsuccessful, we will keep your profile in a pool of candidates (so that we can offer you future opportunities that may be of interest to you) and, if necessary, share your profile with other SQLI entities that may offer opportunities corresponding to your expectations.</b></p>	<ul style="list-style-type: none"> <li>• identification data.</li> <li>• information about your academic and professional background.</li> <li>• data relating to technical and/or personality test(s).</li> <li>• note-taking data for recruiters.</li> <li>• information on the outcome of your application.</li> <li>• information about your current professional situation; and</li> </ul>	<p>If we are unable to accept your application and wish to keep it, we will inform you accordingly so that you can object.</p> <p>If you do not request the destruction of your file, your data will be automatically destroyed <b>two years after the last contact with you.</b></p> <p>Should we wish to retain your file beyond this point, we will seek your express consent to do so.</p>

	<ul style="list-style-type: none"> <li>personal data contained in correspondence.</li> </ul>	
<b>Preparation, exercise and follow-up of a legal action or the enforcement of a court decision</b>	<ul style="list-style-type: none"> <li>identification data.</li> <li>information about your professional situation.</li> <li>personal data contained in correspondence; and</li> <li>data relating to any disputed facts.</li> </ul>	We will retain your personal data until the expiry of all legal actions.

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.

## 7. What rights do you have?

In accordance with applicable data protection regulations, and particularly the GDPR, you have the following rights: right of access, rectification, erasure, opposition, limitation of processing, portability of your personal data.

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 to 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 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, for reasons relating to your situation, to our using your personal data. 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 restrict processing**

You may also request that we restrict the processing of your personal data for reasons relating to your situation. 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 data 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.

## **8. How to exercise your rights**

To exercise your rights, please contact our dedicated department using the contact details given in [Section 9 \(How can you contact us?\)](#). 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 regulations on the protection of personal data. If your 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, if you consider that your rights have not been respected or that the processing of their personal data has been carried out in violation of the applicable regulations on the protection of personal data and the principles set out in this Notice, you may file a complaint with the competent courts or with the competent data protection authority, in Spain, the Agencia Española de Protección de Datos (“AEPD”) located Jorge Juan, 6. 28001 Madrid, Spain.

## **9. How can you contact us?**

If you have any questions or requests concerning the processing we carry out with your personal data under this Notice, including the exercise of your rights, as detailed above, you can contact us, by email at the following address: [privacy@sqli.com](mailto:privacy@sqli.com) and/ or [dataprotection.spain@sqli.com](mailto:dataprotection.spain@sqli.com) or by mail, at the following address: SQLI Spain, c/o HRBP, Constitucio 3, 2nd Floor, 08960 Sant Just Desvern, Barcelona, Spain.

## **10. Changes and updates to the Notice**

We periodically review this Notice to ensure compliance and to keep it up to date with the GDPR and other applicable data protection regulations.

We will inform you of any changes to this Notice.

**Date of last update:** 16 September 2024