

# **Privacy notice – Personal Data Protection Candidates**

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# **Table of Contents**

1.	Who is the controller in charge of the processing of your Personal Data?	2
2.	What categories of Personal Data do we collect?	2
3.	What sources do we collect Personal Data from?	2
4.	For what purposes and on what legal bases do we process your Personal Data?	3
5.	Do we use automated processing in the recruitment process?	3
6.	How do we store and how long do we keep your Personal Data?	4
7.	To whom do we transfer your Personal Data?	4
8. exerc	What are your rights with regards to the processing of your Personal Data? How can you ise them?	5
8.1	Your rights as regards our processing of your Personal Data	5
8.2	Contact us to exercise your rights	6
9.	Updates to this Privacy Notice	6



#### 1. Who is the controller in charge of the processing of your Personal Data?

In the context of the General Data Protection Regulation (EU Regulation 2016/679, hereinafter referred to as the "GDPR"), we, Keensight Capital, a simplified joint-stock company registered in the Paris Company Register under number 509 104 527, having its registered office at 128, rue du Faubourg Saint-Honoré - 75008 Paris (France), is the controller responsible for the processing of Personal Data (the "Personal Data" or "Data") described in this Privacy Notice (the "Privacy Notice").

However, for certain positions, external recruitment firms or online platforms (job boards) may also act as independent controllers with regard to the processing of your Personal Data, notably when they collect and manage applications on their own behalf before transferring them to us. In such cases, we encourage you to refer to the privacy policies of those third parties for details on how they process your data.

The aim of this Privacy Notice is to inform you about the processing of your Personal Data.

The different ways to contact us regarding the processing of your Personal Data are set out in Section 8 of the Privacy Notice.

#### 2. What categories of Personal Data do we collect?

In order to achieve the processing purposes described in this Privacy Notice, we collect and process the following categories of Personal Data:

- personal identification information and contact details information (Name, nationality, gender, etc.);
- personal contact details (addresses, email address, phone number, etc.);
- Professional information (e.g. profession, company, etc.);
- Recruitment information (including copies of right to work documentation, references, other
  information included in a CV or cover letter or as part of the application process, result of test
  assessment done in the course of your recruitment process with us);
- Employment records (including job titles, work history, performance, working hours, holidays, training records and professional memberships);
- Photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information:

Information about criminal convictions and offences, if relevant for your position.

#### 3. What sources do we collect Personal Data from?

We collect your Personal Data through the application and recruitment process, either directly from you or sometimes from an employment agency or background check provider. We may sometimes



collect additional information from third parties including former employers, credit reference agencies or other background check agencies to the extent permitted by applicable law and social media tools (LinkedIn).

If you receive an offer from us, we may conduct a background check on you or instruct a third party to do so on our behalf. This screening will only be conducted where legally permitted based on the laws of the location where the position is based and will be limited to what is necessary and proportionate to the role being offered. A background check will only involve criminal background data to the extent permitted by law. Our legal basis for background screening is our need to perform precontractual measures related to establishing our employment relationship.

#### 4. For what purposes and on what legal bases do we process your Personal Data?

We process your Personal Data for the following purposes:

- Recruitment and Evaluation: To assess your suitability for a role, including reviewing your CV, cover letter, qualifications, references, and other relevant information.
- Communication: To contact you regarding the recruitment process, interviews, and any updates or decisions related to your application.
- Compliance: To ensure compliance with legal obligations, such as equal opportunity employment laws and data protection regulations.
- Background Screening: Where applicable and permitted by law, to conduct background checks as part of the hiring process.
- Pre-contractual Measures: To take steps prior to entering into an employment contract with you, including negotiating terms and preparing employment agreements.

The legal bases for processing your Personal Data include:

- Consent: For certain data you provide voluntarily, such as sensitive data or additional information requested during the recruitment process.
- Legitimate Interest: For evaluating your application and communicating with you throughout the hiring process, which is necessary to manage the recruitment process effectively.
- Legal Obligation: To comply with legal and regulatory requirements related to employment.
- Pre-contractual Necessity: To take steps necessary to potentially enter into an employment contract with you.

We process your Personal Data solely for these purposes and ensure compliance with relevant data protection laws.

# 5. Do we use automated processing in the recruitment process?

As part of our recruitment process, we may use automated tools to assist in the initial sorting and evaluation of applications. These tools analyze information provided by candidates — such as



educational background, professional experience, languages spoken, and digital skills — to assess their relevance to the position for which they applied.

These systems are not used to make final decisions about hiring. However, they may be used to perform an initial filtering of applications, especially in the case of a large number of candidates.

Please note that automated screening is only one step in the overall selection process, and all shortlisted applications are subsequently reviewed by a human recruiter before any decision is made. Candidates retain the right to request human intervention, express their point of view, and contest any decision made solely on the basis of automated processing, in accordance with applicable data protection laws.

#### 6. How do we store and how long do we keep your Personal Data?

We securely store your Personal Data electronically. Only the authorised personnel of Keensight (ie. HR team members and other personnel involved in your recruitment process) have access to your Data.

We ensure that the Personal Data collected during the recruitment process is retained only for as long as necessary to complete the process. Personal Data of successful candidates will be incorporated into their personnel file and retained for the duration required, which is up to five years following the end of the employment relationship.

With the candidate's consent, if applicable, the Personal Data of unsuccessful candidates may be retained in a CV database for the purpose of offering future job opportunities. This data will be kept for a maximum period of two years from the date of last contact, in line with the purposes outlined in this Privacy Notice.

#### 7. To whom do we transfer your Personal Data?

Your Personal Data may be shared with other entities directly affiliated with Keensight Capital as part of the recruitment process. This includes situations where members of the HR team involved in reviewing your application are employed by different legal entities, or when interviews are conducted with professionals across the group to assess your suitability for a role.

These transfers may occur within the European Union as well as outside the European Economic Area (EEA), in particular to the United Kingdom and the United States.

- Transfers within the EU are carried out in accordance with applicable data protection rules.
- Transfers to the United Kingdom are covered by an adequacy decision adopted by the European Commission.



 For transfers to the United States, where no general adequacy decision currently applies, we implement appropriate safeguards as required under Article 46 of the GDPR, including the use of Standard Contractual Clauses (SCCs) and additional technical and organizational measures.

In all cases, these transfers occur solely within our group and are necessary for recruitment purposes. We apply the principles of Article 44 of the GDPR to ensure that your Personal Data continues to benefit from a level of protection that is not undermined, and we do not share your data with third parties outside the group. We never sell or rent your Personal Data.

# 8. What are your rights with regards to the processing of your Personal Data? How can you exercise them?

#### 8.1. Your rights as regards our processing of your Personal Data

As regards our processing of your Personal Data described in this Privacy Notice, you have the right, under certain circumstances set out in the GDPR and the French data protection law (insofar as it applies):

- to be provided with a copy of any Personal Data that we hold about you, and receive information about our processing of your Personal Data;
- to require us to update or correct any inaccurate Personal Data, or complete any incomplete
   Personal Data;
- to require us to delete your Personal Data;
- to restrict our processing of your Personal Data that we carry out;
- not to be the subject of a decision based exclusively on automated processing, including profiling, which produces legal effects concerning you or which significantly affects you in a similar way;
- to object to the processing of your Personal Data;
- to receive your Personal Data in a structured, commonly used and machine-readable format, and to ask us to transfer them to another controller;
- to define guidelines for the storage, erasure and disclosure of your Personal Data after your death. These guidelines are general or specific. The general guidelines concern all your Personal Data and may be registered with a trusted third party certified by the French Data Protection Authority ("Commission Nationale de l'Informatique et des Libertés") ("CNIL"). The specific instructions concern the processing of Personal Data mentioned in these instructions, and are registered with us.

Finally, you have a right to lodge a complaint with the relevant supervisory authority (in particular in the Member State of your habitual residence, place of work or place of the alleged infringement), if you are of the opinion that any of your Personal Data is processed in a manner constituting an infringement to the General Data Protection Regulation.



## 8.2. Contact us to exercise your rights

If you wish to exercise any of your abovementioned rights, you can contact us using one of the options below:

- you can send us an email to the following addresses: gdpr@keensightcapital.com
- you can write to the following postal address: Keensight Capital, 128, rue du Faubourg Saint-Honoré 75008 Paris (France).

We kindly ask you to clearly indicate in your communication which Personal Data or processing operations are the subject of your request.

You can also contact us if you have any questions or queries as regards our processing of your Personal Data, using the contact options above.

### 9. Updates to this Privacy Notice

You can find out the date when this Privacy Notice was last amended by checking "Last modified" at the top of this page. The latest version of this Notice is available at any time on Keensight Capital's website (www.keensightcapital.com).