



## PRIVACY POLICY

### Applicants and Employees

(V1. 2024)

#### 1. General

Botify, a French Société par Actions Simplifiée with a capital of €74,873.68, whose registered office is located at 12 rue d'Amsterdam, 75009 Paris, France, and which is registered in the Paris Trade and Companies Register under number 519 350 813 (hereinafter "**BOTIFY**"), strongly encourages you to read this data protection policy (hereinafter the "**Data Protection Policy**") carefully before using the website (hereinafter the "**Site**").

Both users of the Website and persons who are in contact with BOTIFY employees, in particular by telephone, e-mail or on social networks, are referred to in this Data Protection Policy as "**Users**". Users are in most cases applicants, new employees or potential applicants for BOTIFY jobs.

The Data Protection Policy sets out how BOTIFY, as the data controller, handles the personal data of Users.

Each User acknowledges that he/she has read and fully accepts this Data Protection Policy when browsing the Site or communicating by any means with a BOTIFY consultant. This Policy can be downloaded from the Site or communicated to the User on request. Regular updates are also available on our website.

When BOTIFY's recruitment specialists are in contact with Users, references to this Data Protection Policy will be included in the messages.

Please note that the Website and the processing of personal data by BOTIFY are listed in the register of personal data processing activities in accordance with the GDPR.

#### 2. Collection of personal data

The information communicated by the User through the forms available on the Site or through contact with BOTIFY employees is intended for use by authorized BOTIFY personnel for administrative and commercial management purposes, to enable the User to apply for BOTIFY offers or to contact BOTIFY.

These data constitute personal data, i.e. information relating to an identified or identifiable natural person (hereinafter "**data subject**").

In the context of the Website and the services offered by BOTIFY [discussion forums, job offers, periodic newsletters, press releases, BOTIFY publications, etc.], the Data Subjects are the Users defined in Article 1. The personal data concerned by this Data Protection Policy are therefore all data relating to these Internet users and users, insofar as they are identified or identifiable, for example by means of the cookies used for the operation of the Site, but also via the information spontaneously communicated by the Users.

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The processing of personal data is subject to a specific legal and regulatory framework, which for France is essentially constituted by the General Data Protection Regulation (hereinafter "**GDPR**") and the so-called "Informatique et Libertés" law of 6 January 1978.

The information marked with an asterisk is mandatory. Otherwise, your request cannot be processed or will be delayed.

BOTIFY may ask you to provide personal data, either on an optional or mandatory basis:

- Civil status, identity, identification data, photo (e.g., on the CV),
- Electronic and physical address,
- Information related to your professional life (CV, cover letter, professional and academic background, etc.),
- Economic information, such as your salary or your objectives related to salary level,
- Gender and pronoun
- Any information necessary for the processing of your application.

At no time do we ask you to provide us with sensitive data (e.g. related to your religion or health).

BOTIFY states that this information :

- The following will be obtained and processed fairly and lawfully
- The following will be recorded for specific and legitimate purposes (set out in point 3. below);
- The following will be used for these purposes
- Are adequate, relevant and not excessive in relation to these purposes;
- Precautions shall be taken to ensure the security and confidentiality of the data in order to prevent them from being damaged, modified, destroyed or communicated to unauthorized third parties.

### **3. Purpose of collection and legal basis for processing**

The collection of information listed in section 2 above serves multiple purposes. The management of job offers, applications, and interviews necessarily involves the processing of personal data of candidates who have created an account within the platform. This management includes:

- The collection, recording, and storage of candidates' personal data;
- Making contact (email, phone) and organizing interviews;
- Identifying a candidate for a position and offering a position that matches the profile;
- Managing the candidate's profile;
- Verifying references and background;
- Managing and improving the recruitment platform to offer better products and services to the candidate;



- Managing audits, reports, and internal or external inspections;
- Conducting anonymous statistics to prove our compliance with regulations;
- Complying with legal obligations to which Botify is subject;
- Protecting our staff, our rights and those of others, our property, and our information.
- The processing of personal data must be implemented based on an adequate legal basis, which are:
- The execution of pre-contractual measures taken at the request of the candidate to create an account on the recruitment platform with the aim of applying for a job at Botify as well as managing interviews;
- The consent of candidates to receive a newsletter on jobs;
- Complying with legal obligations incumbent on Botify, notably information system security and due diligence;

Botify's legitimate interest in:

- Creating a candidate pool;
- Determining how candidates arrived at the platform in order to improve the visibility of job offers;
- Preserving the security and confidentiality of its information system;
- Ensuring compliance with our non-discrimination hiring procedures;
- Complying with international regulations, defending its interests in court or before an arbitrator, managing general corporate operations, protecting its staff, property, and information, and offering products that are state-of-the-art.

Data may not be reused for purposes not compatible with the original purposes unless the candidate's consent is obtained. If applicable, a notification of data reuse will be made to the candidate beforehand.

You are informed that in case of opposition to the processing (see section 6.5 below) or if you transmit incorrect or fictitious data, the services related to the collection of these data cannot be provided, with BOTIFY in no case being liable in this respect.

#### **4. Recipient(s) of the collection**

The personal data collected by means of the contact forms on the Site or BOTIFY's partner sites are intended for the **persons and departments in charge of information processing within BOTIFY who** need to know them.

Personal data collected through responses to job and internship offers on the Site and unsolicited applications or through any exchange with employees by any means whatsoever are also processed by **the persons in charge of recruitment within BOTIFY** in order to process the application process.

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The personal data collected by BOTIFY on the Site or by any other means of communication are for internal use.

Your personal data is transferred to technical service providers (website hosting and maintenance, data storage, SEO and programmatic platforms).

Your personal data may also be transferred to countries outside the European Union. In order to ensure an appropriate level of data security in these countries, BOTIFY transfers the data to countries considered by the European Commission to guarantee an adequate level of protection or implements appropriate safeguards such as standard contractual clauses.

## **5. Duration of storage of personal data**

The User's personal data, and in particular the recruitment data linked to an application file, will not be kept beyond the time required to manage the application and offers that we may make to the User and, in any event, beyond 5 years from the last contact.

## **6. Rights of the Persons concerned**

Pursuant to the applicable laws and regulations on the protection of personal data, you have the rights set out in Articles 6.1 to 6.9 regarding the processing of your personal data. These rights are not, however, absolute and unconditional; they may be exercised to the extent permitted by the regulations and subject to the legal requirements and obligations that may be justified by BOTIFY. If necessary, BOTIFY will inform you of the reasons for refusal.

You can exercise your rights or contact the Data Protection Officer by contacting BOTIFY in writing at the following address

- [dpo@botify.com](mailto:dpo@botify.com)

As these rights are purely personal, and can therefore only be exercised by the Person concerned, please attach to your request, in addition to the reasons for it, a copy of your valid and signed identity document. This will not be kept beyond the time required to verify your identity.

All requests must be clear, precise and justified.

### **6.1. Right of access**

You may request access to your personal data processed by BOTIFY. If you so request, BOTIFY will provide you with a copy of all your personal data and all the information required by law, namely

- Categories of personal data collected and processed;
- The purposes of their processing ;
- The categories of recipients to whom personal data have been disclosed or are likely to be disclosed;
- The length of time personal data is kept and ;



- Information about your rights with regard to your personal data.

## **6.2. Right to portability**

For processing operations that are based on your consent or are necessary for the performance of a contract, you also have the right to the portability of your personal data.

This right differs from the right of access to personal data in that (i) it only concerns data that you have provided to BOTIFY and (ii) it allows you to obtain this data in a structured and machine-readable format.

Your right to the portability of personal data also gives you the possibility to have your personal data transferred to another controller, at your choice, provided that this is technically possible.

## **6.3. Right of rectification**

You can ask for your personal data to be corrected if it is found to be inaccurate, incomplete or out of date.

## **6.4. Right to erasure**

You can request that your personal data be deleted in the following cases if :

- Your personal data are no longer necessary for the purposes for which they were collected and/or processed;
- You have withdrawn your consent to the processing of your personal data, provided that your prior consent was the lawful basis for its collection and processing and that there is no other lawful basis for it;
- You have objected to the collection or processing of your personal data in accordance with Article 6.5 below;
- The processing of your personal data is unlawful;
- Your personal data must be deleted in order for BOTIFY to comply with a legal obligation;
- You were a minor at the time your personal data was collected. In the latter case, and provided that you were a minor at the time of the request, your guardians may also request BOTIFY to delete your personal data;
- In the event that you contest the accuracy of your personal data, and for the period of time necessary for BOTIFY to verify it;
- If the processing of your personal data is unlawful and you wish to restrict it rather than request its deletion;
- If you wish BOTIFY to store your personal data when this is necessary for the establishment, exercise or defence of your legal rights;
- If you have objected to the processing of your personal data, during the period in which BOTIFY checks whether it has no other overriding legitimate grounds for further processing.

If the data concerned has been passed on to third parties, BOTIFY will inform these third parties of your request as far as possible.



## **6.5. Right to object**

Subject to a legitimate justification based on the specific nature of your situation, you may object to any processing of your personal data if your personal data are processed on the basis that the processing is necessary for the performance of a task carried out in the public interest or for the pursuit of the legitimate interest of BOTIFY or a third party.

You may also object at any time, without any obligation to give reasons, to the processing of your personal data when it is carried out for the purpose of commercial prospecting.

## **6.6. Right to restrict processing**

You can request the restriction of the processing of your personal data in the following cases:

- In the event that you contest the accuracy of your personal data, and for the period of time necessary for BOTIFY to verify it;
- If the processing of your personal data is unlawful and you wish to restrict it rather than request its deletion;
- If you wish BOTIFY to store your personal data when this is necessary for the establishment, exercise or defence of your legal rights;
- If you have objected to the processing of your personal data, during the period in which BOTIFY checks whether it has no other overriding legitimate grounds for further processing.

BOTIFY will then cease to process the data concerned and will retain it for the appropriate period.

## **6.7. Right to digital death**

You may give BOTIFY advance instructions concerning the storage, deletion and communication of your personal data in the event of your death.

## **6.8. Right to withdraw consent**

For all processing operations that are based on your consent, you have the right to withdraw your consent at any time, without having to justify this to BOTIFY.

## **6.9. Right to lodge a complaint with a supervisory authority**

We invite you first to address any questions, disputes or complaints relating to your personal data to BOTIFY. BOTIFY will endeavour to find an amicable solution satisfactory to you as soon as possible.

If you are dissatisfied with the answers or solutions proposed by BOTIFY, you have the right to lodge a complaint with the competent supervisory authority regarding the processing carried out by BOTIFY.

For France, this supervisory authority is the CNIL. For more information on the CNIL and how to contact it, please visit [www.cnil.fr](http://www.cnil.fr).

## **7. Your commitment to sincerity**



The User guarantees the truthfulness and reality of the information contained in his/her application (profile, skills and abilities, training, professional experience, information on his/her personal and professional situation, etc.), regardless of the communication channel used to transmit his/her application to BOTIFY (email, social networks, Site, etc.).

By sending your application via the Internet or via social networking sites (LinkedIn, Viadeo, etc.), you undertake to provide only sincere, real and fair information about yourself and in particular: your career path, the diplomas you have obtained, the duration of the positions you have held and their nature (fixed-term contract, permanent contract, internship, temporary work, professional training contract, etc.) Please note that during our recruitment process, this information will be verified. Any insincere, false or unfair information constitutes a manoeuvre aimed at misleading BOTIFY about your skills and diverting our recruitment process.

You expressly recognise that such actions engage the responsibility of their authors and consequently agree to guarantee us against all the financial consequences - and the costs of advice for our defence - arising directly or indirectly from any claim or action brought against us due, in whole or in part, to a lack of sincerity with regard to information that you have entrusted to us.

## **8. Cookies**

### **8.1. What is a cookie?**

A cookie is a text file that may be stored in a dedicated space on your computer's hard drive, subject to your choices, when you visit an online site using your browser.

It is transmitted by a website's server to your browser. Each cookie is assigned an anonymous identifier. A cookie cannot be traced back to an individual.

### **8.2. What are our cookies for?**

Cookies allow us to improve your experience on our Site by analysing its use and technical and navigation parameters. They allow us to detect and anticipate fraud.

The cookies used allow us to identify the sections you have visited. This information is useful to us in order to personalise our services and make it easier for you to navigate our site.

When you visit our Site we may install, subject to your acceptance, the following cookies:

- Session cookies which disappear as soon as you leave the Site. We use them for various purposes, in particular to better understand the use you make of our Site during a single visit and to make its use more optimal;
- Permanent cookies, which remain on your terminal until their lifetime expires or until you delete them using your browser's functions. These cookies are used for analysis and statistical purposes (measurement of the audience rate of our Site).



Only the sender of a cookie can read or modify the information contained in it.

Third-party cookies may be placed on your terminal by partner companies (in particular Lever/LinkedIn, etc.). In this respect, we ensure that these partners comply with the RGPD and the French Data Protection Act.

We may also integrate into our site applications from these third parties allowing you to relay content from our Site or to make known your consultation or opinion concerning it (e.g., "share" and "like" buttons from social networks such as LinkedIn). As we do not control the collection of data by social networks, we suggest that you consult the privacy policies of these networks and configure your user accounts in order to exercise your rights if necessary.

### 8.3. Our use of cookies

In order to provide our services, to secure and improve the Site, to personalise your experience and to help you make the best use of the Site, we may associate information collected via cookies with other personal information about you.

The table below identifies the cookies that may be installed on your computer. We will keep this information up to date as our cookies change for reasons of performance and security.

#### Type of cookies

##### Who are these cookies for?

##### Refuse these cookies

**Strictly necessary cookies:** These cookies are necessary for the proper functioning of the site and allow you to use the essential functions (such as sending your CV)

[www.google.com](http://www.google.com)

You may not refuse these cookies, as they are strictly necessary for the operation of the Site. You can block or delete these cookies by changing your browser settings, as described here: [**Your choices**].

This operation may alter your experience on the Site, or even prevent you from using all or part of the Site.

**Functionality cookies:** These cookies make it easy to apply for jobs and retrieve CVs from cloud storage

[www.dropbox.com](http://www.dropbox.com)

[www.google.com](http://www.google.com)

<https://slack.com/>

To refuse these cookies, please follow the instructions here:

<https://policies.google.com/technologies/managing?hl=en-US><https://help.dropbox.com/fr->

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[fr/accounts-](#)

[billing/security/cookies#:~:text=How%20does%20Dropbox%20use%20cookies,for%20which%20it%20was%20collected.](#)

**Analysis cookies:** These cookies allow us to analyse your browsing and measure the site's audience in order to respond to your needs and improve the site.

[www.google.com](http://www.google.com)

To refuse these cookies, please follow the instructions here:

<https://policies.google.com/technologies/managing?hl=en-US>

**Social cookies:** These cookies allow you to relay content from our Site or to make your consultation or opinion about it known.

You can refuse these cookies by clicking on the following link:

<https://www.linkedin.com/legal/cookie-policy>

Disabling these cookies will prevent the display of advertisements on the Site.

## 8.4. Your choices

### Acceptance of cookies

In accordance with the recommendations of the CNIL, when you first connect to the Site, you will be expressly asked to accept the Site's cookies. By using the Site, you therefore consent to the use of these cookies.

This consent is valid for 6 months.

### Refusal of cookies

You can refuse cookies in a number of ways. Please note that if you refuse cookies, you will not be able to use certain features, pages or areas of the Site. BOTIFY declines all responsibility for the consequences of the degraded functioning of the Site.

#### ***Tool available in our Data Protection Policy***

You can choose to disable all or individual cookies on a case-by-case basis.

This choice to save cookies can be expressed and changed at any time, free of charge, by clicking on the opt-out links provided in our Data Protection Policy (see point 3 above).

### Browser control

[Your browser is able to alert you about cookies placed on your computer and inform you of your ability to accept or decline these cookies.](#)

[We suggest that you take into account the purpose of cookies when setting your browser.](#)

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As the configuration of web browsers is different, you should refer to the help menus of each of them:

- **Chrome**  
[:https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=fr](https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=fr)
- **Internet Explorer:** <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- **Edge:** <https://privacy.microsoft.com/fr-fr/windows-10-microsoft-edge-and-privacy>
- **Safari:** <https://support.apple.com/fr-fr/guide/safari/manage-cookies-and-website-data-sfri11471>
- **Firefox:** <https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences>
- **Opera:** <http://help.opera.com/Windows/9.20/fr/cookies.html>
- **Internet Explorer:** <https://support.microsoft.com/fr-fr/topic/supprimer-et-g%C3%A9rer-les-cookies-168dab11-0753-043d-7c16-ed5947fc64d>
- **Edge** : <https://support.microsoft.com/fr-fr/microsoft-edge/supprimer-les-cookies-dans-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09#:~:text=Ouvrez%20Microsoft%20Edge%2C%20puis%20s%C3%A9lectionnez,et%20autres%20donn%C3%A9es%20de%20site>
- **Firefox:** <https://support.mozilla.org/fr/kb/comment-activer-option-ne-pas-pister>

If you use more than one browser, we suggest that you manage your preferences for each browser you use.

For Google Analytics, you can unsubscribe:

- via the website :

<http://www.google.com/settings/ads>

- or by downloading the Google Analytics browser add-on at :

<https://tools.google.com/dlpage/gaoptout>

Finally, you can set your browser to warn websites that you do not want to be tracked ("Do Not Track" option):

- **Chrome:** <https://support.google.com/chrome/answer/114836?>

- **Opera:** <https://help.opera.com/en/opera36/be-safe-and-private/#notrack>

## 9. Specific information on video surveillance

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### **9.1. Purpose of the processing (purpose and legal basis)**

BOTIFY's premises at 8-12 rue d'Amsterdam 75009 PARIS are placed under video surveillance to ensure the safety of its staff and property. The images recorded in this system are not used for staff surveillance or time and attendance control.

The legal basis for the processing is the legitimate interest in accordance with Article 6.1.f) of the European Data Protection Regulation.

### **9.2. Data and categories of data subjects**

BOTIFY employees are filmed by the device. Occasional visitors (applicants, customers and service providers) to the company's premises may also be filmed.

### **9.3. Recipients**

In the event of an incident, the images may be viewed by authorised BOTIFY personnel (the legal representative of BOTIFY, the HR department and any other authorised person) and by the police. The company's staff and service providers responsible for the maintenance of the equipment may also access the images, for this sole purpose.

### **9.4. Shelf life**

The images are kept for one month. In the event of an incident related to the security of persons and property, the video surveillance images may nevertheless be extracted from the system. They are then kept on another medium for the time needed to settle the procedures linked to this incident and are accessible only to persons authorised in this context.

### **9.5. Rights of individuals**

With regard to this video surveillance system, you can access your data or request their deletion. You also have the right to object and the right to limit the processing of your data. All these rights are described in Article 6 of this personal data protection policy. To exercise these rights or for any questions about the processing of your data in this system, you can contact our Data Protection Officer (DPO) whose contact details are given in point 6 of this personal data protection policy. In accordance with point 6.9 of this personal data protection policy, if you feel, after having contacted us, that your rights have not been respected or that the video device does not comply with the data protection rules, you can submit a complaint online to the CNIL or by post.