

Tricount S.A.

Recruitment Privacy Notice

Last updated: 2022-04-19

1. About this Notice

- 1.1 This Recruitment Privacy Notice ("**Notice**") explains how Tricount S.A. ("**TRICOUNT**", "**we**" and "**our**") collect, share and use any information that, alone or in combination with other information, relates to individuals ("**Personal Data**") who apply for a job on our website ("**Applicants**", "**you**" and "**your**").
- 1.2 This Notice also sets out the rights that you have in relation to the Personal Data that we process about you and how you can exercise them.
- 1.3 Tricount treats compliance with its privacy obligations seriously. This is why we have developed this Notice, which describes the standards that Tricount applies to protect Personal Data.
- 1.4 For the purposes of this Notice, Tricount headquartered at Rue la Place n°10, B-1325 Chaumont-Gistoux and, with the commercial registry of Crossroads Bank of Enterprises (RPM Brabant-Wallon) under number 0508.560.013 and with VAT BE0472.607.061, is the data controller for the Applicant's Personal Data. As a data controller, Tricount is responsible for ensuring that the processing of Personal Data complies with applicable data protection law, including the General Data Protection Regulation.
- 1.5 Please take the time to read this Notice carefully. If you have any questions or comments, please contact us via email at privacy@tricount.com.

2. What Personal Data does Tricount collect and why?

- 2.1 The types of Personal Data that we may collect about you, and the reasons why we process it, include:

Types of Personal Data	Why we collect it	Legal basis
Name	To enable you to contact us or enable us to respond and provide feedback in the context of recruitment;	Our legitimate interest to carry out recruitment and to manage the hiring process
Surname		
E-mail address	To evaluate and select job applicant including for example setting up and conducting interviews;	
Home address		
Phone number	To evaluate and assess the	
Curriculum Vitae		

Work History	results thereto and as is otherwise needed in the recruitment processes including the final recruitment; To communicate with you during the recruitment process.	
Name, Surname Email address Phone Number CV Home address Bank account details	To put in place necessary arrangements for future employment.	Contractual necessity
Name, Surname Email address Phone Number CV Home address	To generally manage and improve our recruitment and hiring process.	Our legitimate interest to improve our hiring process

2.2 We do not actively request any information that reveals your racial or ethnic origin, religion, political or philosophical beliefs, trade union membership, genetic or biometric information, or information about your health/sex life or sexual orientation, or about the commission or alleged commission of criminal offences and any related legal actions, during the job application process. We therefore ask you not to provide such information. Nonetheless, we may have knowledge of some sensitive data (e.g. religion) if you spontaneously provide it to us in your CV.

2.3 If we ask you to provide any other Personal Data not described above, then the Personal Data we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect that Personal Data.

3. Who does Tricount share your Personal Data with?

3.1 We may disclose your Personal Data to the following categories of recipients:

- (a) to **our group companies** for purposes consistent with this Notice. We take precautions to allow access to Personal Data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the Personal Data for any other purpose.

- (b) to **our third party vendors, services providers and partners** who provide data processing services to us, or who otherwise process Personal Data for purposes that are described in this Notice or notified to you when we collect your Personal Data. This may include disclosures to third party vendors and other service providers we use in connection with the services they provide to us, including to support us in areas such as managing résumé/CV information, IT platform management or support services, infrastructure and application services, data analytics. Our third party vendors, services providers and partners include: Partena, Atlassian, Google Workspace;
- (c) to **any competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- (d) to **our auditors, advisors, legal representatives and similar agents** in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the Personal Data for any other purpose;
- (e) to **a potential buyer, investor or lender** (and its agents and advisers) in connection with any proposed investment, purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your Personal Data only for the purposes disclosed in this Notice;
- (f) to any other person if you have provided your prior consent to the disclosure.

4. How we protect your privacy

4.1 We will process Personal Data in accordance with the following principles:

- (a) **Fairness:** We will process Personal Data fairly. This means that we are transparent about how we process Personal Data and that we will process it in accordance with applicable law.
- (b) **Lawfulness:** We will process Personal Data only on lawful grounds;
- (c) **Purpose limitation:** We will process Personal Data for specified explicit and legitimate purposes, and will not process it in a manner that is incompatible with those purposes, unless permitted by applicable data protection laws.
- (d) **Data minimization:** We will process Personal Data that is adequate, relevant and limited to what is necessary to achieve the purposes for which the data are processed.
- (e) **Data accuracy:** We take appropriate measures to ensure that the Personal Data that we hold about you is accurate, complete and, where necessary, kept up to date. However, it is also your responsibility to ensure that your Personal Data is kept as accurate, complete and current as possible by informing us promptly of any changes or errors. You should notify us of any changes to the Personal Data that we hold about you (e.g. a change of address).

- (f) **Data security:** We use appropriate technical and organisational measures to protect the Personal Data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Data. In particular, all data is protected according to the varying levels of risks through physical measures, such as secure areas, technical measures, such as encryption, and organisational measures such as employee security through vetting and supervision.
- (g) **Limited Retention:** We keep your Personal Data in a form that allows us to identify you for as long as necessary to achieve the purposes for which we are processing your data and do not store your data for longer, unless we must comply with applicable laws.

5. Data storage, retention and deletion

- 5.1 The Personal Data we collect from you is stored in servers operated by our third party service providers. These servers may be located in the United States, in Europe, Asia or Australia.
- 5.2 We retain Personal Data we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).
- 5.3 When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.
- 5.4 If you are not successful, Tricount will keep your application form on file for future job openings no longer than one year. If you are successful and offered a job at Tricount, your Personal Data will be used to complete your hiring process by our HR department.
- 5.5 When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.
- 5.6 For more details about the periods of retention of your Personal Data, please refer to the table above.

6. International transfers of data

- 6.1 Your Personal Data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.
- 6.2 Specifically, the servers operated by our third party service providers are located in the United States, in Europe, Asia or Australia. This means that when we collect your Personal Data we

may process it in any of these countries. However, we have taken appropriate safeguards to require that your Personal Data will remain protected in accordance with this Notice. These include implementing the European Commission's Standard Contractual Clauses for transfers of Personal Data between with our third party service providers and partners and further details can be provided upon request.

7. Your data protection rights

7.1 You have the following data protection rights:

- (a) If you wish to **access, correct, update or request deletion** of your Personal Data, you can do so at any time by contacting us using the following contact details privacy@tricount.com.
- (b) In addition, in certain circumstances, as stipulated in the applicable data protection legislation, you can **object to processing** of your Personal Data, ask us to **restrict processing** of your Personal Data or **request portability** of your Personal Data. Again, you can exercise these rights by contacting us using the following contact details privacy@tricount.com.
- (c) If we have collected and process your Personal Data with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent.
- (d) If you have a complaint or concern about how we are processing your Personal Data then we will endeavour to address such concern(s). If you feel we have not sufficiently addressed your complaint or concern, you have the **right to complain to a data protection authority** about our collection and use of your Personal Data. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area are available [here](#).)

7.2 We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

8. Updates to this Notice

8.1 We may update this Notice from time to time in response to changing legal, technical or business developments. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws.

8.2 You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Notice.

9. How to contact us

9.1 If you have any questions or concerns about our use of your Personal Data, please contact privacy@tricount.com.