

# PRIVACY POLICY

**DOCLER GROUP**

44, AVENUE JOHN F. KENNEDY, L-1855 LUXEMBOURG  
GRAND-DUCHY OF LUXEMBOURG  
RCS LUXEMBOURG: B 180 726

## Welcome to our Privacy Policy!

When you decide to apply for a job position at the Docler group, you will share some personal information with us.

Your privacy is important to us. This Privacy Policy will explain how we collect, use and share your personal information, so that you can make informed choices about the use of your data.

This Privacy Policy is addressed to candidates applying for a position within the Docler Group or with our clients to whom we provide recruitment services.

Please read this Privacy Policy carefully.

If you have any question about our privacy practices or about how we are processing your personal information, please contact us and we will be happy to assist you and provide the information you need.

### 1. WHO DECIDES "HOW" AND "WHY" YOUR PERSONAL DATA IS PROCESSED?

Your potential future employer decides "how" and "why" your data is processed and is called "Data Controller".

When you apply for a position within the Docler group, the "Data Controller" is your potential future employer for the job in question, which is indicated in the job description or communicated to you by our recruiters.

When you are approached by our recruiters for a position with our clients (i.e., to whom we provide recruitment services), Docler Services S.à r.l. is the Data Controller in its role as recruiter, however, when your data is shared with our client, the latter receives your data as a Data Controller. We always communicate to you the name of our client prior to such sharing.

### 2. WHAT PERSONAL DATA DO WE PROCESS?

We collect certain personal information about you in the course of the recruitment process:

#### 2.1.

When you apply for a position at the Docler Group either directly on our site, through email or mail, through a professional social network, or after having been contacted by a recruiter, we need the following minimum information about you in order to process your job application:

- Your full name;
- Your E-mail address;
- Your Phone number;
- Your birth date and location of birth;

- Your CV / Resume;
- The job position you are interested in, in case you did not apply directly on our site in response to a posted job offer.

For certain specific positions (such as in legal, finance or audit), we may also ask you to provide us with your criminal record.

In certain cases, when it is required for the job position to evaluate the candidates, we may ask you to do specific tests (such as language tests, colors tests, IT competencies test, etc.) and/or provide us a work of your portfolio.

In some cases, on the basis of the position you applied for, we might ask you to record a video answering to some questions. This will help us to better evaluate your profile for the position.

Your birth date and the location of your birth location might be collected in our websites to help us to verify your identity and your further on-going applications for our open positions.

## 2.2.

You may freely communicate us additional information on your own initiative, such as:

- A cover letter;
- A photo;
- Copies of your diploma, grade or language certificates;
- Additional contact details, such as your Skype ID;
- Your hobbies or interests;
- Your potential start date.

In some cases, our recruiters may also ask you if you agree that she/he records the interview. You are fully free to accept it or not, your decision will have no consequence on the recruitment process.

## 2.3.

In the course of the recruitment process, you may also communicate some requests, such as your salary or bonus expectations or certain allowance request(s) (e.g., relocation allowance request). Please note that these specific requests are kept by the recruiter in charge of your recruitment process and only shared with the responsible manager(s) in case we would like to make an offer to you.

## 2.4.

When reviewing your application or meeting you in the course of an interview, our recruiters will also evaluate your profile and generate evaluation and/or interview notes

### 2.5.

We may contact and receive information about you from your personal/professional reference, if provided by you.

**2.6.** We may also collect information about you from publicly available sources in some cases, such as from your professional social network account (e.g. LinkedIn, Stackoverflow, Hubspot account).

## 3. WHY DO WE PROCESS YOUR PERSONAL DATA?

We use the information we collect for the following purposes:

### 3.1. Recruitment

We collect and process your personal information for recruitment purposes: to review your application, evaluate your profile, determine if you are a good fit for the position, and contact you in the course of the process to schedule interviews or discuss your profile.

We process this information given our legitimate interest in finding new employees for our opened positions and processing your job application.

### 3.2. Future job opportunities

In case you received a negative answer as regards the job you applied for, we will keep your personal information in our recruitment database for a period of two years. In this way, we will be able to contact you in order to communicate new job opportunities matching with your skills and your profile.

Please note that we are using a recruitment software that enables us to gather the profiles of our candidates and search in our recruitment database based on filter(s). For example, when we search for a candidate in our database for a new position, we may filter the result by skills. Your skills may have been documented by our recruiters in our database based on the prior recruitment process you had with them.

Be aware that you can object at any time to the storage and use of your personal data for future job opportunities, by sending us an email at the relevant email address, as indicated in **Section 9 "HOW TO CONTACT US"**.

We process this information given our legitimate interest in maximizing our recruitment process and providing you with job offer(s), which could be of interest for you.

At the end of the two-years retention period, we will only keep your personal information in our recruitment database in order to contact you in case of future job opportunities, if you consented to such storage and use of your information.

### 3.3. Improve our recruitment process

We may use your email to send you an invitation to participate in anonymous surveys so we can learn more about your experience and improve our recruitment process. If you participate, your answers will only be used for statistics and analytics purposes.

We may use your email address to invite you to the test of Insight Discovery that helps you and us to understand better your profile, strengths and the value you can bring to the team using a table of colors.

The results will be evaluated together with the technical skills showed during the interviews and you will be also free to not participate to the test. This will not affect the decision.

We process this information given our legitimate interest in improving our recruitment process.

### 3.4. Comply with any legal requirements and enforce our legal rights

We may rely on a legal obligation to process your personal data. We may also use your information to respond to requests of competent authorities or to establish, exercise or defend legal claims.

We may combine your information with information lawfully obtained from other third-party sources and use it for the above purposes.

## 4. HOW DO WE PROTECT YOUR PERSONAL DATA?

We implement serious security measures, technical and organizational, to ensure the maximum protection possible to your personal information against unauthorized access, modification, disclosure or deletion.

We periodically test our IT systems, conduct sophisticated penetration tests and actively implement data loss prevention systems against leakage, theft and data breach to ensure that our site and entire IT infrastructure is regularly updated against the latest network security vulnerabilities.

In addition, we have in place strict access controls to candidate's data. The access to your information is limited on a need-to-know basis and our recruiters are subjects to strict confidentiality obligations.

## 5. WITH WHOM DO WE SHARE YOUR DATA?

We share your data with the following parties:

### 5.1. Entities of Docler group

Depending on the job location you applied for, your job application may be processed by different entities of our Group (a) for their own account or (b) on behalf of another company of our group in the same country or (c) on behalf of another company of our group or a third-party to which they are providing recruitment services:

- If you apply to a job position located in Luxembourg, or in any other countries (except Hungary and the US), your job application will be processed by the recruiters of Docler Services S.à r.l., 44, Avenue John F. Kennedy, L-1855, Luxembourg, Grand Duchy of Luxembourg.
- If you apply to a job position located in Hungary, your job application will be processed by the recruiters of Docler Services Kft, Expo tér 5-7, H-1101, Budapest, Hungary.
- If you apply to a job position located in the US, your job application will be processed by the recruiters of Docler LA LLC, 10811 Washington Blvd. Suite 400, Culver City, CA. 90232, USA.
- We will also share your personal information with the responsible manager(s) having the skills to interview you and/or decide about the outcome of your application. The responsible manager(s) might be employed by a different entity of our group.

## 5.2. Our clients

We may share your personal data with our clients to whom we provide recruitment services where the client receiving the personal data has provided adequate safeguards.

We require from all of our clients to agree to the data sharing terms set out in the signed engagement letter. Our clients confirm that their organization is GDPR compliant and will handle the shared data in accordance with the data protection laws and regulation under the basis of their own privacy policy.

We will never share your personal information with our clients without your consent.

## 5.3. Service providers

### SmartRecruiters Inc.

We contracted with SmartRecruiters Inc. established in the USA for the use of a recruitment software.

SmartRecruiters Inc. acts as a data processor and we have contractually binding obligations in place in order to ensure that they process information we share with them in accordance with our instructions, this Policy and all applicable data protection laws.

## 5.4. Law enforcement agencies or governmental authorities

We may also share information with law enforcement agencies or authorities, if such disclosure is reasonably necessary to (a) comply with our legal obligations, (b) respond to information requests for fraud investigations and alleged illegal activities, and/or (c) protect our rights or defend ourselves against any claims.

## 6. HOW DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA?

In the course of the recruitment process, your personal information may be transferred outside of the European

Economic Area ("EEA") to our affiliated companies, for the purposes specified in this Privacy Policy.

If we transfer your personal data outside of the EEA, we endeavor to ensure that your rights and freedoms in respect of the processing of your personal data are adequately and appropriately protected. For this purpose, we utilize the Standard Contractual Clauses approved by the European Commission that you can find [here](#).

Please note that regardless of where you live, your personal data will be protected by the GDPR as our business is located within the EEA.

## 7. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

We did our best to explain what your rights are and how you can exercise them. If, despite of our below explanations, you are still unsure about the actions you can take or the conditions of exercise of your rights, do not worry, our HR department will provide you with all the assistance you need when exercising your rights.

You may also contact us, at any time, before exercising any of your rights, and we will reply to your request as quickly as possible.

Our HR department will provide you with information on actions taken within 30 days of the day we receive your request. Only in exceptional circumstances, when we face complex or a high number of requests, we may extend this period of response up to 60 days.

Please note that rights may be exercised free of charge. However, unfounded or excessive requests, in particular because of their repetitive character, will lead to the payment of a fee.

If you wish to exercise any of your rights below, please send us an email, as indicated in Section 9 **"HOW TO CONTACT US"**.

### 7.1. Data access and data portability

You have the right to access the personal information that we hold about you by requesting a copy of your personal data free of charge.

Upon verification of your identity, your request will be processed by our HR Team.

If we consider that your request is manifestly unfounded or excessive (for example, because you requested a copy of your data numerous times in a short period of time), we may refuse to act or charge a reasonable fee taking into account the administrative costs for providing you the information.

In certain cases, you may also be entitled to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another controller (where technically feasible).



## 7.2. Data access and data portability

You have the right to request that we correct any inaccuracies in your personal data.

## 7.3. Data retention and erasure

We will retain your personal information during two years from the day you applied for a job position at the Docler Group. At the end of these two-years retention period, we will erase or anonymize your personal information from our systems, unless you agree to a longer storage and use of your personal information.

If you got a position at the Docler Group, please note that the retention of your personal data will be governed by our employee's privacy policy.

If you no longer want us to use your information, you can request that we erase your personal information from our systems.

Please note that in case you request the erasure or if we decide ourselves to start the erasure process at the end of our retention period(s), we may have to retain and use some of your personal information to the extent necessary to comply with any relevant legal obligations.

## 7.4. Right to object

We process your data for the reasons explained in Section 3 **"WHY DO WE PROCESS YOUR PERSONAL DATA?"**. Applicable law may entitle you to require us not to process your personal information for certain specific purposes where such processing is based on legitimate interest. If you object to such processing, we will stop processing your personal data for these purposes.

In specific situations, we may have to refuse the execution of your request. This would be the case where we have legitimate grounds to continue such processing or if we have to establish, exercise or defend legal claims.

This means that you have the right to object to the continuance of an-going recruitment process or to the storage and use of your personal information that enables us to contact you for future job opportunities.

## 7.5. Right to restriction of processing

You have the right to request that we stop processing your data, while we resolve any issues.

This is only possible in the following four cases:

- If you contest the fact that the personal data, we hold about you is accurate: in this case, the processing operations in relation to this data will be put on hold for the period during which this is verified.
- You have objected to a processing activity based on legitimate interest(s): in this case, you can require the processing operation to be put on hold while we verify the grounds for processing.



- You consider that the processing is unlawful, but you object to erasure and request restriction, instead.
- We have no further need for the data, but you require it to establish, exercise, or defend legal claims.

Despite your request, we may continue to process your data if we have to establish, exercise, or defend legal claims. We will notify you before lifting a restriction.

## 7.6. Right to lodge a complaint with a supervisory authority

If you consider that our processing of your personal data infringes the GDPR or any other applicable national laws, you have the right to lodge a complaint with a supervisory authority, (in particular in the Member State where you live, place of work or of an alleged infringement of the GDPR).

## 8. CHANGES TO OUR PRIVACY POLICY

We may occasionally amend this Privacy Policy to reflect changes in our recruitment processes and the way we handle your personal information or changes in the applicable laws.

If we make changes we consider important, we will let you know by placing a notice on our site and/or contact you using other methods such as email.

To the extent permitted by applicable law, such changes will be applicable from the time they are published on our site, unless we specify a date of entry into force. Your continued use of our site from that day on will be subject to the new Privacy Policy.

## 9. HOW TO CONTACT US?

If you have any comments or questions about this Policy or our privacy practices, or you want to exercise one of your privacy rights, please send an email to the competent HR department, which will get quickly back to you. We are always glad to talk about our privacy practices.

- **Docler Services S.à r.l.:** [privacy.recruitment@doclerholding.lu](mailto:privacy.recruitment@doclerholding.lu)
  - for Luxembourg and all positions worldwide, excluding Hungary and US
  - for positions with our clients (when we provide recruitment services to them)
- **Docler Services Kft.:** [dpo@doclerservices.hu](mailto:dpo@doclerservices.hu)
  - for all positions located in Hungary
- **Docler LA LLC:** [privacy.recruitment@doclermedia.us](mailto:privacy.recruitment@doclermedia.us)
  - for all positions located in the US

We are also happy to inform you that we have an employee dedicated to ensuring your privacy, our Data Protection Officer.

You can directly reach our Data Protection Officer via email at [dataprotectionofficer@doclerholding.com](mailto:dataprotectionofficer@doclerholding.com).