

## PERSONAL DATA PROTECTION POLICY

### RECRUITING

#### 1. What is the purpose of this Privacy Notice?

BROADPEAK (hereinafter "BROADPEAK", "we", "us" and "our") attaches great importance to your privacy.

The purpose of this Privacy Policy (hereinafter the "Policy") is to inform you in more detail about the processing of personal data (hereinafter the "Data") by Broadpeak S.A. in connection with the recruiting activities for employees, and work force for Broadpeak SA and its affiliates.

This Policy also informs you of your rights regarding your Data.

#### 2. The identity and contact details of the Controllers

Broadpeak

Name : Broadpeak, S.A.

A company duly organized and existing under the laws of France and having its registered offices at 3771 Boulevard des Alliés, 35510 Cesson-Sévigné, France,

Registered at the Rennes Trade Register under the number 524 473 063

HR Department

Mail : [privacy@broadpeak.tv](mailto:privacy@broadpeak.tv)

#### 3. What Personal Data do we process, for what purposes and how?

Personal data

We collect your identification and contact data :

- Name, first name(s) & title
- Contact details (Email address and phone number)
- CV/Resume (including supporting diploma or certificate)
- Work history and references
- Academic work
- Soft skills
- Background check information : Id information; judicial history (Bull 3 of French Criminal record or foreign equivalent)
- Visa, Work permits and other permits or authorizations where necessary

The source of the personal data

- Information provided by you when submitting your application, request for information and interview;

	<ul style="list-style-type: none"> <li>• Information available from public source (eg LinkedIn...)</li> <li>• Information from third parties such as recruitment agencies or headhunting firms or from other Broadpeak employees or workers who recommend people they know for employment with Broadpeak</li> </ul>
<p>How do we use your data?</p>	<p>BROADPEAK uses your Data to:</p> <p>We collect and use your Personal Data for the purpose of recruitment, including:</p> <ul style="list-style-type: none"> <li>• Identifying and contacting potential candidates;</li> <li>• Evaluating candidates for potential employment by assessing the competency and suitability of candidates applying for employment with BROADPEAK;</li> <li>• Keeping records relating to recruitment;</li> <li>• Providing you with more suitable career opportunities at BROADPEAK;</li> <li>• Identifying candidates for future positions that may become available;</li> <li>• Making hiring decisions on whether or not to offer employment to any particular candidate;</li> <li>• Deciding the terms and conditions of any such offer;</li> <li>• Having evidence in case a legal claim is pursued by any candidate;</li> <li>• Complying with legal or regulatory requirements;</li> <li>• Scientific research and statistical purposes;</li> <li>• Maintaining a talent pool in order to contact potential candidates that have given their separate consent to do so with regard to future job openings even if an actual application was unsuccessful.</li> </ul> <p>Below are the legal bases for the purposes of processing</p>
<p>Legal Basis ?</p>	<p>We process the Personal Data of candidates for the purposes of the employment relationship, in particular for the decision on the establishment of the employment relationship (Art. 6 para. 1 lit. b GDPR). It is also in BROADPEAK's legitimate interests (Art. 6 para. 1 lit. f GDPR) to process the Personal Data in order to ensure that the best suited candidate with the required skills, qualifications and experience is offered employment and to fulfill precontractual obligations.</p> <p>In order to verify the work history of the candidate and assess their suitability for employment, we conduct referencing and, in particular cases, other background checks (Art. 6 para. 1 lit. b and f GDPR). In some cases, we may ask the candidate's consent (Art. 6 para. 1 lit. a GDPR) before conducting such background checks; however, we reserve to rely on additional legal grounds for the processing within the context of such background checks even if the Candidate refuses or revokes their consent. The information is collected directly from the Candidate and from third parties such as former employers. To the extent permitted by applicable laws, we use a third party supplier who provides us with the outcome of the Background Checks (not the underlying data they have collected in the course of the checks). The</p>

	<p>outcome report is strictly limited to those individuals within BROADPEAK who are involved in the recruitment and selection process and other individuals specified in our Background Checks Policy.</p> <p>Where we process Personal Data for the purpose of complying with legal or statutory requirements, this is based on Art. 6 para. 1 lit. c GDPR.</p> <p>The processing for scientific research and statistical purposes is based on Art. 89 GDPR for legitimate use, in connection with the specific safeguards and derogations in accordance with the GDPR.</p> <p>Processing candidates personal data in BROADPEAK's talent pool with regard to future job openings even if an actual application was unsuccessful will be based on the candidate's separate consent (Art. 6 para. 1 lit. a GDPR).</p>
<p>Do we disclose your data?</p>	<p>We may disclose some of your personal data:</p> <ul style="list-style-type: none"> <li>- Process the Data strictly according to our instructions;</li> <li>- Process the Data only for the purposes intended;</li> <li>- Take adequate security measures to protect the Data processed.</li> </ul> <p>Human Resources, Recruitment team members and managers/other employees within BROADPEAK who are involved in the recruitment and selection process and general human resources management of the successful candidate may have access to your data provided.</p> <p>In order to perform some administrative clearance or steps, we may need to share your data with local administration (eg URSAF; Prefecture;..).</p> <p>We use service providers such as recruitment platforms (We Recruit), document management platforms (Microsoft 360) and electronic signature platforms (e.g. Yousign) to notify and sign job offers, contracts and other documents. These third parties process your personal data strictly in accordance with our instructions and for the intended purposes.</p> <p>Furthermore, recruitment agencies and headhunter firms receive feedback from BROADPEAK in relation to the assessment of the candidates they have recommended and the terms and conditions of employment to be offered to any candidate they have recommended. In this case, the processing is based on the purpose of the candidate's agreement with the recruitment agency or headhunter firm and on our and the recruitment agency's/headhunter firm's legitimate interest to process such data for the purpose of determining and settling a potential referral fee (Art. 6 para. 1 lit. b and f GDPR).</p>

<p><b>4. Do we transfer your Data outside the European Union?</b></p>	
	<ul style="list-style-type: none"> <li>• This international transfer of your Data to our Affiliates is covered by Standard Contractual Clauses approved by the European Commission, as provided in Article 46 of the GDPR.</li> </ul>

- The international transfer of your sensitive data is covered by the consent you have given prior to the processing of your Data.
- If you want to have access to these Standard Contractual Clauses, please contact us via the contact form available at the following address [privacy@broadpeak.tv](mailto:privacy@broadpeak.tv)

## 5. How long do we retain your Data?

We retain your Data for as long as necessary to fulfill the purposes described in this Policy.

Your Data is retained for the following periods:

Purposes of Processing	Conservation Period
Recruiting activating, including setting appointment meeting, interviews	2 years
Management of Pool of talents	2 years
Statistics	2 years
Management of pre-litigation and litigation	5 years

## 6. Your rights as a Data Subject

In accordance with applicable law, you have the following rights with respect to the use of your personal data. These rights may be subject to certain conditions, limitations and legal exceptions.

If you wish to obtain more details on how to exercise your rights or for any question relating to your personal data, and any procedure relating to the exercise of your rights, please fill in the form accessible at

the following address: [privacy@broadpeak.tv](mailto:privacy@broadpeak.tv)

or to the following postal address:

Broadpeak, S.A.  
3771 Boulevard des Alliés,  
35510 Cesson-Sévigné, France

In accordance with the law, requests for the exercise of rights must provide sufficient information for BROADPEAK to verify the identity of the individuals (to ensure that those making the requests are the individuals themselves or those authorized by them).

BROADPEAK will verify upon receipt of the request that the request is in compliance with applicable regulations.

We may decline to process or limit certain requests under certain circumstances, e. g. if they are manifestly unfounded or excessive or if they adversely affect the rights and freedoms of others.

In addition, if you believe that your Data is not being processed in accordance with this Policy or the applicable personal data protection regulations, you may file a complaint with the Commission Nationale Informatique et Libertés (CNIL): 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07 or [www.cnil.fr](http://www.cnil.fr)

<b>Right of Access</b>	You have the right to obtain from BROADPEAK confirmation as to whether or not Personal Data concerning you is being processed and, where that is the case, access to a copy of the Personal Data and specific information about how BROADPEAK processes the Personal Data.
<b>Right of Rectification (Correction)</b>	You have the right to obtain from BROADPEAK the correction of inaccurate Personal Data concerning you and also the right to have incomplete Personal Data completed.
<b>Right of Erasure (Deletion)</b>	You have the right, in certain cases, to obtain the deletion of your Data. This right applies in particular when your personal data are no longer necessary for the purposes for which they were collected;
<b>Right to Restriction</b>	You have the right to obtain from BROADPEAK restriction of processing in particular circumstances.
<b>Right of Objection</b>	You have the right to object to the processing of your Personal Data in particular circumstances.
<b>Right of Portability</b>	In certain circumstances, you have the right to receive your Personal Data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.
<b>Right to Withdraw Consent</b>	Where the legal basis of processing Personal Data is based on consent, you have the right to withdraw your consent at any time.
<b>Right to define directives concerning the fate of your personal data post-mortem</b>	You have the right to set guidelines for the retention, deletion and disclosure of your Data after your death.
<b>Bloctel</b>	You also have the possibility of registering on the "BLOCTEL" list of opposition to telephone solicitation on the website <a href="http://www.bloctel.gouv.fr">www.bloctel.gouv.fr</a> .

**7. How do we protect your data ?**

We aim to take all reasonable organizational and technical measures to protect your Personal Data from unauthorized access, disclosure, use, modification, damage or loss. We will continue improving these measures to protect the security of your Personal Data. For example, we use encryptions to ensure data confidentiality; we use trusted protection mechanisms to protect data from malicious attacks; we deploy access control mechanisms to ensure only authorized personnel can access Personal Data; and we raise awareness among employees about the importance of protecting Personal Data through security and privacy protection training sessions.

**8. How do we update this policy?**

In the event that this Policy changes, BROADPEAK will take appropriate steps to ensure that you are aware of the latest version of this Policy, such as by posting a notice of change or by any other appropriate means.

Last update: [March 26, 2024](#)