

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA COLLECTED AS PART OF A RECRUITMENT PROCESS

Updated on 19/02/2024

1. WHO IS THIS PRIVACY POLICY FOR?

This privacy policy (the "**Policy**") is intended for all persons applying for a position (permanent contract, fixed-term contract, work-study program, etc.) within the Bpifrance group.

In addition, in certain cases, it is possible that the profile of people who have not directly applied will be studied, or even kept, by the services of the Bpifrance group (for example, when an application is sent by a third party to an entity of the Bpifrance group). These individuals are also affected by this Policy.

As part of their recruitment activities, the entities of the Bpifrance group are required to process certain information that allows you to be directly or indirectly identified, or even to identify persons you know (the "**Personal Data**").

The objective of the Policy is therefore to inform you about the processing of Personal Data carried out in the context of recruitment operations, as well as at the end of these operations, by the Bpifrance group.

2. WHO IS RESPONSIBLE FOR THE PROCESSING CARRIED OUT?

The entity of the Bpifrance group that employs you, with which you have signed a contract or an agreement (if you are an intern, for example), or for which you work, if you are an external worker (e.g. temporary worker), is deemed to be acting as a data controller (the "**Company**") when it processes your Personal Data.

3. WHAT DATA DOES THE COMPANY PROCESS AND FOR WHAT PURPOSES?

The table below describes: (i) the categories of Personal Data that the Company is required to process, if any; (ii) the purposes for which such processing is carried out; and (iii) the legal basis for legitimizing the latter.

Purposes of the processing	Categories of Personal Data Processed	Legal basis for processing
<p>1- Carrying out recruitment operations, including:</p> <ul style="list-style-type: none">- Receiving, registering, filing CVs and cover letters,- Management of recruitment procedures,	<ul style="list-style-type: none">• Identification data: surname(s), first name(s), personal postal address, personal email address, personal telephone number;• Personal characteristics data: age, year of birth, date of birth, place of birth, gender;• Court data: bulletin B3• Data relating to hobbies and interests: non-professional activities and interests if specified	<ul style="list-style-type: none">• Legitimate interest of the Company in recruiting profiles adapted to its needs

Purposes of the processing	Categories of Personal Data Processed	Legal basis for processing
<ul style="list-style-type: none"> - Analysis and evaluation of applications, - Responding to applications 	<p>by the candidate on his/her Curriculum Vitae;</p> <ul style="list-style-type: none"> • Data relating to education, training and qualifications: years of graduation, university curriculum, diplomas obtained, school, nature of training related to recruitment, foreign languages spoken; • Data relating to professional life: Curriculum vitae, skills, professional background, employment, (current) employer, previous employers, previous self-employed activity, professional training, professional history, place of work, training course; • Data relating to image registration: image of the person if provided by the candidate on his/her CV; • In general, all Personal Data appearing on your CV, cover letter or any other document to which you give access to the Company in the context of your application (for example in your letter of recommendation). 	
<p>2. Sending communications related to HR news and professional opportunities at Bpifrance</p>	<ul style="list-style-type: none"> • Identification data: surname(s), first name(s), personal postal address, personal email address, personal telephone number. 	<ul style="list-style-type: none"> • Consent of the candidate
<p>3. Compilation of the administrative file of the selected candidates</p>	<p>(i) As part of the Company's internal organization</p> <ul style="list-style-type: none"> • Data relating to the composition of the household: marital status (not concerned, single, married, widowed, divorced, separated, cohabiting, unknown) and family status (surname, first name, sex and date of birth of each child); • Management data: Certificate of health insurance rights; in the case of an exemption from health insurance: the certificate from the spouse's employer, or a copy of 	<ul style="list-style-type: none"> • Legitimate interest of the Company in compiling an administrative file of successful candidates

Purposes of the processing	Categories of Personal Data Processed	Legal basis for processing
	<p>the valid health insurance card for fixed-term contracts.</p> <p>(ii) In order to meet the company's legal obligations</p> <ul style="list-style-type: none"> • Identification data: national identity certificate, passport, residence permit; • Banking and financial data: bank details; • Image recording data: image of the person. 	<ul style="list-style-type: none"> • The Company's legal obligations: <ul style="list-style-type: none"> ○ Entitlements and benefits ○ Checks on foreign candidates
<p>04. Management of complaints and possible disputes arising from recruitment operations</p>	<ul style="list-style-type: none"> • Identification data: surname(s), first name(s), personal postal address, personal email address, personal telephone number; • Personal characteristics data: age, year of birth, date of birth, place of birth, gender; • Data relating to hobbies and interests: non-professional activities and interests if specified by the candidate on his/her Curriculum Vitae; • Data relating to education, training and qualifications: years of graduation, university curriculum, diplomas obtained, school, nature of training related to recruitment, foreign languages spoken; • Data relating to professional life: Curriculum vitae, skills, professional background, employment, (current) employer, previous employers, previous self-employed activity, professional training, professional history, place of work, training course; • Image registration data: image of the person; • In general, all Personal Data appearing on your CV, cover letter or any other document to which you give access to the Company as part of your application (e.g. letter of recommendation). 	<ul style="list-style-type: none"> • Legitimate interest of the Company in defending its interests in court

Please note that, in accordance with the principle of Personal Data minimization, the Company will only collect the Personal Data it needs for the purposes set out above.

The Company may ask you for certain information that directly or indirectly identifies third parties, such as the identity of your former employers in order to verify your references.

If you provide Personal Data concerning third parties, then it is your responsibility to duly inform them about the processing of their Personal Data by the Company, for the purposes and in the manner described in this Policy.

In the event that you do not provide the Personal Data that is required as such or identified by an asterisk, the Company will not be able to carry out its recruitment operations and will be forced to reject your application.

4. HOW LONG IS YOUR PERSONAL DATA STORED?

The Company will retain the Personal Data that you provide to the Company only for as long as is necessary for the purposes for which the Personal Data was collected. Thus, the Company will apply the following retention periods:

Purpose of the processing	Retention period
01. Carrying out recruitment operations, including the management and follow-up of applications	<ul style="list-style-type: none">• For the duration of the recruitment process.
02. Sending communications related to HR news and professional opportunities from Bpifrance	<ul style="list-style-type: none">• For a period of 2 years after obtaining the candidate's consent.
03. Compilation of the administrative file of the selected candidates	<ul style="list-style-type: none">• The data concerning the successful candidates will be integrated into their administrative file and will be kept for the retention period applicable to it (i.e. up to five years after the end of the employment relationship).
04. Management of complaints and possible disputes arising from recruitment operations	<ul style="list-style-type: none">• The Personal Data necessary for this purpose are kept for 5 years at the end of the recruitment process. In the event that a dispute does arise, the Personal Data will then be kept for the duration of this dispute and until the expiry of all possible remedies.

5. TO WHOM IS YOUR PERSONAL DATA DISCLOSED?

Your file is treated confidentially. Only the people involved in your recruitment process (recruitment officers, Bpifrance staff in the departments concerned by the recruitment) have access to the personal data contained therein.

This data is intended for Bpifrance and will also be communicated to our service providers providing the service of publishing recruitment offers and collecting CVs, to our IT service providers, or to any other service provider or subcontractor providing services in connection with all or part of the processing identified on behalf of Bpifrance.

In the event of a positive outcome to the recruitment process, in order to finalize the recruitment, the human resources department will be required to transmit some of the information collected to the organizations informed of your hiring (in particular unemployment insurance, health insurance, retirement, mutual insurance).

Your data may also be communicated to any French or international administrative, judicial, arbitral or supervisory authority that benefits from a right of communication based on a legislative provision in the context of a French or European administrative or judicial procedure, at their request.

6. WHAT ARE YOUR RIGHTS?

In accordance with the Applicable Regulations, and subject to the conditions set out therein for the exercise of these rights, you benefit from:

- A right of access, rectification, deletion, as well as the right to portability of your Personal Data;
- The right to request the limitation of the processing concerning you and to object to receiving commercial prospecting.
- The right to withdraw your consent for processing based on it;
- From the ability to provide the Bpifrance group entity with directives relating to the fate of its Personal Data after your death.

To exercise your rights, please contact the data protection officer of the Bpifrance group, using the contact details provided in Section 7 ("*How to contact the Company?*") below.

You also have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL).

7. HOW TO CONTACT THE COMPANY?

Please send all correspondence to the Data Protection Officer (DPO) of the Bpifrance group using the contact details below:

By email via donneespersonnelles@bpifrance.fr.
By post by writing to Bpifrance - DCCP - Data Protection Officer
Address: 27-31 avenue du Général Leclerc 94 710 Maisons Alfort

8. UPDATING THE POLICY

This Policy may be amended and updated periodically to reflect legislative or regulatory developments or to meet our information obligations under applicable regulations on the protection of personal data.

We invite you to refer to them regularly on our website.

The Policy is available at: <https://talents.bpifrance.fr/>

In addition, in the event of substantial changes, Bpifrance will inform you of the update of this Policy in order to bring you to your attention to developments relating to the processing of your personal data.