

CANDIDATE PRIVACY POLICY

1. General warning

POLITICO SRL and Drive Innovation Insights SAS (hereafter collectively "**POLITICO**", "**we**" or "**us**") make it a matter of pride to respect the privacy of our candidates (hereinafter "**Candidates**" or "**you**") and to treat their personal data in the strictest confidentiality and in accordance with the legislation in force, in particular, the General Data Protection Regulation 2016/679 (hereafter the "**GDPR**"). This Candidate Privacy Policy (hereinafter "**The Policy**") describes how we handle and protect your personal data in connection with POLITICO's recruiting processes and programs.

The term "**Candidate**" is used in this Policy to refer to anyone who applies for a job role, or who otherwise seeks to work with or for us (whether on a permanent or non-permanent basis).

2. Who is the data controller?

POLITICO acts as the data controller with regard to the processing of Candidate's personal data.

The listing below identifies the POLITICO company that is the data controller of your personal data and to which this Policy refers when using the term "POLITICO", "we" or "us":

BELGIUM, GERMANY AND UK:

Country for which you apply for a job: Belgium, Germany and UK.

The POLITICO Company acting as your data controller will always be:

POLITICO SRL
Rue de la Loi 62
1040 Brussels
Belgium

Belgian business registry (BCE) number: BE 0526 900 436

FRANCE:

The POLITICO Company posting the job position will be the one acting as your data controller:

POLITICO SRL
Rue de la Loi 62
1040 Brussels
Belgium

Belgian business registry (BCE) number: BE 0526 900 436

OR:

Drive Innovation Insights SAS
Boulevard Haussmann 162/164
F-75008 Paris
France

SIREN 490045838

Please address any questions or requests relating to this Policy to the following address: privacy@politico.eu.

3. What personal data do we collect?

POLITICO processes the following personal data for the purposes described in point 4:

- your identifying information (such as surname, first name, date of birth, nationality, e-mail address, telephone number and address);
- your information about your entitlement to work in the EU or in the UK.
- any other personal data included in your CV, cover letter, application form or on your LinkedIn profile (such as professional experience, education, interests and linguistic competence);
- any other information you voluntarily provide throughout the process, via our communications (by email or other), including online, through interviews or other forms of assessment.
- any information and responses to optional Candidate experience surveys conducted by POLITICO recruitment team directly or on its behalf.

POLITICO obtains the above personal data directly from you or via our partners, such as recruiting services, temporary agencies, *etc.* It is not mandatory to provide this information, but if you do not provide it, we may not be able to continue our recruitment process in some cases.

4. Why do we collect your personal data?

We collect and process your personal data necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract, based on our legitimate interest or to fulfil a legal obligation in particular for the following purposes:

- the recruitment of employees, interns and other staff members (legal basis: performance of a contract (and take steps in preparation thereof) and legitimate interest (to enable us to effectively recruit staff and assess whether you are a suitable candidate for POLITICO));
- to respond to requests for information and questions from Candidates (legal basis: performance of a contract);
- to respond to requests for information from the relevant authorities (legal basis: legal obligation).
- to conduct Candidate experience surveys (legal basis: legitimate interest: to assess and improve our recruitment process and assess how we can make it as enjoyable and attractive as possible for Candidates). Candidate participation is absolutely voluntary, and we will only ask for participation once. You can opt-out of receiving these emails or participating in surveys at any time by sending an email to Recruitment <recruitment@politico.eu or privacy@politico.eu.

5. Do we share your personal data?

POLITICO treats personal data as confidential information. We will not communicate them to third parties under any condition other than those specified in the Policy, such as to achieve the objectives set out and defined in point 4, or under the conditions in which the law requires us to do so.

POLITICO may communicate Candidate's personal data to third parties to the extent that such information is necessary for the performance of a contract.

We use third-party service provider to provide a recruiting software system. We may also share your personal data with other third-party service providers that may assist us in identifying and recruiting talent, administering and evaluating pre-employment screening and testing, and improving our recruiting practices. The communication of this information to the aforementioned persons shall, in all circumstances, be limited to what is strictly necessary or required by the applicable regulations.

We maintain processes designed to help ensure that any processing of personal data by third party service providers is consistent with this Policy and protects the confidentiality, availability, and integrity of your personal data in compliance with applicable law.

We store and process your personal data in the European Economic Area (**EEA**), as well as in the United Kingdom (**UK**). However, it is marginally possible that your data may be transferred to subcontractors, business partners, as well as the parent company, subsidiaries and affiliates of the Axel Springer Group located in other countries outside the EEA and the UK (including the United States) some of them which may have legislation on the protection of personal data less protective than that in force in the country where you reside. In the event of a transfer of this type, we ensure that the processing is carried out in accordance with this Policy and that it is framed by (i) the Standard Contractual Clauses approved by the European Commission or the UK Government, (ii) by any other Adequacy Decision issued by the European Commission as providing adequate protection or Adequacy Regulations issued by the UK Government, or (iii) any other contractual mechanisms approved by any Public data protection body which make it possible to guarantee a sufficient level of protection of privacy and fundamental rights of individuals.

For more information about the safeguards relating to personal data transfers outside of the EEA and the UK, please contact our Data Responsible at privacy@politico.eu if you are a POLITICO SRL Candidate or privacy@dii.eu if you are a Drive Innovation Insights SAS one.

6. What are your rights ?

You possess the following rights with respect to the processing of your personal data by POLITICO:

- **Right of access to data:** you may, at any time, have access to the personal data that POLITICO has on you or check if you are included in the database of POLITICO and obtain information about the processing of your personal data.
- **Right to rectification and erasure:** you may, at any time, notify POLITICO of corrections to your personal data and, where appropriate, request the deletion of your personal data.
- **Right to restriction of processing:** you may, in particular, request POLITICO to restrict the processing, when you dispute the accuracy of the data or when you consider that the processing is illegal.
- **Right of portability:** you have the right to receive the personal data that you have communicated to POLITICO and may also ask to send this data to another data controller.
- **Right of objection:** you may, in some cases, object to the use of your data by POLITICO for the purposes described in point 4 when the processing is based on POLITICO's legitimate interest.

In order to exercise your rights, you need to contact POLITICO together with a valid proof of your identity:

- by email: privacy@politico.eu
- by mail: POLITICO

To the attention of the Privacy/Data Responsible
Rue de la Loi 62
1040 Brussels
Belgium

7. How do we protect your personal data?

POLITICO has taken the appropriate organizational and technical measures to ensure a level of security adapted to the risk in order to, to the extent possible, prevent:

- unauthorized access to or modification of your personal data;
- improper use or disclosure of such personal data;
- unlawful destruction or accidental loss of such personal data.

In this respect, employees of POLITICO who have access to this personal data are subject to a strict confidentiality obligation.

8. How long do we keep your personal data?

POLITICO shall keep your personal data for the duration necessary to achieve the objectives pursued (see point 4).

If your application is successful, the information you provide during the application process will be saved in your employee file and be retained in line with the POLITICO HR Privacy Policy. This document will be made available to you when you join the company.

The personal data of Candidates which have not been selected during the recruitment process, will be kept for a period of two years in order to be reviewed as soon as a new opportunity arises within our company. At the end of this period, data will be automatically destroyed.

In the meantime, do not hesitate to inform us of any evolution of your career which will allow us to keep your data up to date.

9. Complaint at the supervisory authority

If you have any complaint or question about the processing of personal data by POLITICO, we kindly ask you to contact POLITICO at the following email address: privacy@politico.eu.

We will look into and respond to any complaints we receive.

However, if no amicable solution could be reached, you are informed that you have the right to lodge a complaint with the supervisory authority for the protection of personal data by contacting:

- If you are applying or have applied for a POLITICO SRL's job position:

Belgian Data Protection Authority:

Autorité de Protection des données (APD).

Rue de la Presse, 35, 1000 Brussels

Tel: +32(0)2 274 48 00

Email: contact@apd-gba.be

Website: www.dataprotectionauthority.be

- If you are applying or have applied for a Drive Innovation Insights SAS job position:

French Data Protection Authority:

CNIL (Commission Nationale de l'Informatique et des Libertés)

3 Place de Fontenoy

TSA 80715

75334 PARIS CEDEX 07

France

Tel: +33 (0)1 53 73 22 22

Website: www.cnil.fr

10. Changes to the Policy

POLITICO reserves the right to modify and adapt this Policy, in particular when required to comply with any new legislation and/or regulations applicable. We will post any changes to our Policy on this page. Please check this page regularly to keep up-to-date.

Last update: 12/2023.