

Recruitment Privacy statement

Inside the ASN group

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1 Introduction

ASN group and its subsidiaries (« **ASN** ») respect privacy for job applicants (« **Candidates** ») and has adopted this statement (this « **Statement** »), to define and implement high standards of personal data protection for the Candidates' personal data.

This Statement informs you as to the way ASN processes your personal data, in the context of the recruitment process. It provides details about the types of personal data ASN may process, the way they are processed, and which rights you may exercise.

This Statement applies to the collection and processing of personal data, whether they are automated or not (this includes paper file systems).

The information provided is an addition to applicable law, which prevails over this Statement in case of conflict.

2 Collection of your personal data

ASN collects your personal data from you directly, as well as from other sources, to the extent permitted by applicable law.

Most of your personal data processed by ASN have been collected directly from you, during the recruitment process. ASN may also perform background checks, if such checks are necessary.

ASN only collects personal data necessary for the purpose for which they have been collected and keeps records of these data for the time necessary to the achievement of these purposes.

3 What are the personal data collected by ASN?

During the recruitment process, ASN may need to collect, process, and hold different categories of your personal data. The categories of personal data that are typically collected and processed by ASN during the recruitment process, subject to variation due to local mandatory law and practice, are:

- **Contact details**, such as your name, personal address, phone number(s), email address, place and date of birth.
- **Information about your professional life**, such as your CV, your previous employments, educational details and qualifications, third-party references, background checks and assessments, nationality and/or residence registration information.
- **personal life information**, such as your personal activities.



- **Employment information**, such as employment and career history, information about job offers for other positions or promotions, photographs (with your explicit and specific consent if required), termination details, skills and competencies records, training records, records of projects and intellectual property (e.g., inventions) you have worked with or on.
- **Financial information** relating to your compensation, benefits and pension arrangements, such as details of your salary, company car arrangements.

4 What will ASN do with the personal data?

ASN will use, store and otherwise process your personal data for the purpose for which they were originally collected as described in this Statement. Subject to statutory record-keeping requirements, ASN will delete personal data that are no longer needed.

ASN will process your personal data for the following purpose:

- **Recruitment management**

ASN processes your data when it is necessary to establish a work contract with you, exercise its rights, or fulfil its legal obligations. ASN may also process your personal data when required by law, for internal administrative reasons, and to protect ASN's rights and property.

5 How is sensitive information treated?

ASN aims to limit the collection of Sensitive Information¹ and shall only collect Sensitive Information if there is a legal justification for processing it, or if it is collected and processed with your consent.

ASN recognizes the additional need to protect Sensitive Information. All Sensitive Information is processed in strict compliance with applicable local law and only by a restricted number of individuals that have a clear and justified need to know such information.

Sensitive Information may be processed where necessary to enable ASN to exercise its legal rights or perform its legal obligations as an employer. Examples of such obligations include ensuring the health and safety of ASN's employees through the provision of a safe working environment or where the processing is carried out by a medical doctor or similar health professional bound by a duty of confidentiality to you and is necessary for medical purposes, such as under ASN's occupational health schemes.

¹ **Sensitive Information** means special categories of personal data as defined under applicable law that may be processed only when there is a legal justification (e.g., authorized by law in the field of employment) or with the individual's consent. Such special categories include but are not limited to personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or processing of genetic or biometric data for uniquely identifying an individual, or concerns their finances, health, sex life or sexual orientation.

6 Who has access to your data?

It is ASN's responsibility to implement appropriate access control measures to ensure that your personal data is accessed only by persons having a clear need to know such information.

In the context of recruitment, your personal data are only accessible to the Human Resources department staff, as well as to the operational staff involved in the recruitment process.

7 Transfer of your personal data

ASN will not sell, rent or otherwise disclose your personal data, unless otherwise stated herein:

- **Consent:** ASN may share your personal data, if you have given ASN your consent to do so.
- **ASN companies and authorized third parties:** ASN may share your data with other ASN companies or authorized third parties that process personal data for ASN for the purpose described in this Statement or otherwise provide personnel-related services to ASN. In such case, ASN will ensure that there is a genuine need to transfer your personal data.

Authorized third parties may technically have access to your personal data in the course of providing their services but will be contractually restricted from processing your personal data for other purposes. ASN also requires them to act consistently with this Statement and to use appropriate security measures to protect your personal data.

- **International transfers of personal data:** ASN is a global company that has affiliates, business processes, management structures and technical systems that cross national borders. This means that your personal data may be transferred to countries other than the one where you are employed by ASN. Such other countries do not always have equivalent laws providing specific protection for, or rights in relation to, personal data, or they have different rules on privacy and data protection. ASN takes steps to provide adequate protection for your personal data as required by applicable law. Such steps include, for example, the use of standard agreements approved by relevant authorities (e.g., the European Commission) and the requirement to use appropriate technical and organizational security measures to protect your personal data.
- **Mandatory disclosure:** ASN may be required by law to disclose your personal data to certain local authorities, or other third parties, such as government agencies in charge of tax collection, statistical information or to the police or other law enforcement agencies.
- **Mergers and acquisitions:** when ASN takes step to sell, buy, merge or otherwise reorganize its businesses in certain countries, it may need to disclose personal data to prospective or actual purchasers and their advisers. In such circumstances, ASN will take appropriate measures to protect personal data.

8 Your responsibilities

Each employee of ASN has the responsibility to help ensure that ASN respects data-protection laws, and the privacy policies, procedures, requirements and guidelines of ASN.

During the recruitment process, it is possible that you have access to, or come into contact with personal data about others (such as ASN employees or other persons). You must handle and process all such personal data discreetly, confidentially and in accordance with local laws on data protection and privacy as well as ASN policies, requirements and guidelines. This obligation also applies in your private communication (e.g., not disclosing personal data of others). The obligation to respect data protection and privacy does not cease if your application does not lead to your actual recruitment.

To help ASN maintain accurate personal-data records, you must inform the Human Resources department of any change to your personal data.

Failure to comply with your responsibilities as set out in this Statement could have serious consequences for you and for ASN. Knowingly or recklessly disclosing personal data in breach of ASN policies, procedures, requirements or guidelines could even make you criminally liable.

9 Your rights

With respect to the processing of your personal data, you will always have the rights provided by applicable local law. In addition, this Statement gives you the following rights:

- **Right to access:** you have the right to be informed of what personal data ASN holds about you, the purposes for which they are being processed and categories of recipients to whom they are being or may be disclosed. You are also entitled to obtain a copy of your personal data. There may be certain categories of information prescribed by applicable local law that ASN may lawfully withhold. If ASN declines to provide access to any of the personal data you request, you will be provided with the reasons for such a decision
- **Right to request correction and deletion:** subject to applicable local law, you may be entitled to ask ASN to rectify or delete any of your personal data that is incorrect, incomplete, unnecessary or outdated.
- **Right to object:** you may object to ASN's processing of your personal data on grounds relating to your circumstances. Despite your objections, ASN may be required or permitted by law to process your personal data.
- **Right to withdraw consent:** you have the right to withdraw any consent that you furnished for ASN to process your personal data.



- **Data portability:** When ASN is processing your data based on your consent, or a contract with you, you have a right to request in machine-readable format the personal data you have provided to ASN.
- **Other Rights:** You are entitled to all rights and remedies provided by local applicable law. Generally, you should seek redress in respect of a violation of this Statement from the ASN company that originally collected the relevant personal data.

If you are not satisfied with what we provide when you exercise your rights, you can let us know by contacting the Data Protection Officer using the address privacy@asn.com. If you are still dissatisfied, you also have the right lodge a complaint with a relevant supervisory authority.

10 Whom to contact?

You may access and manage much of your personal data and exercise many of your rights described in section 9 of this statement by contacting the Data Protection Officer using the address privacy@asn.com.

ASN may need to identify you and ask for additional information to be able to fulfill your request. ASN will fulfil your request within the timeframes required by applicable local law, and in the absence of local law, within a reasonable time.

You may as well contact ASN, or our Data Protection Officer if you have any queries or concerns about the management of privacy matters in ASN by writing to privacy@asn.com.

11 Controller of your personal data

The controller of your personal data is the ASN entity that has issued the job description for which you are applying, which determines, alone or occasionally jointly with other ASN entities the purposes and means of processing of your personal data.

12 Changes to this statement

ASN will from time to time review and revise its data protection practices, including this Statement. If this Statement is changed in a material, adverse way, ASN will give a prominent notice indicating the existence and nature of the changes on relevant intranet sites or by other more personal means if required by applicable law. We recommend that you review this Statement from time to time to learn of any such changes to this Statement.