

PUBLICIS GROUPE CANDIDATE PRIVACY NOTICE (SmartRecruiters Platform)

1. Purpose of this document

You are about to submit your application for an open position in an Agency of Publicis Groupe (whether as an employee, trainee, worker or contractor) using the SmartRecruiters platform. Or, you have received an email from a recruitment team of an Agency of Publicis Groupe to offer you to apply to an open position, inviting you to connect to the SmartRecruiters platform.

The purpose of this candidate privacy notice (hereinafter the “Notice”) is to make you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Each Agency you are applying to is regarded as a data controller. As your personal data are shared between the Agencies of Publicis Groupe using the SmartRecruiters platform (see article 9 of this Notice below), the Agencies are regarded as joint controllers.

An “Agency” is a company or a brand name used by a company of Publicis Groupe.

For the remainder of this Notice, the terms “we”, “us” and “our” refer to one or several Agencies of Publicis Groupe.

The SmartRecruiters platform is provided by SmartRecruiters Inc and Publicis Groupe is using this platform as a customer. SmartRecruiters is therefore regarded as the data processor in this situation.

2. Definitions

personal data: means any information relating to an identified or identifiable natural person, such as a name, telephone number, photograph, place of residence, ...

data controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

data processor: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

3. Data protection principles

We will comply with the applicable data protection law and principles, such as the GDPR, which means that your data will be:

- Used lawfully, fairly and in a transparent way.

- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

4. The kind of data we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal data about you:

- The information you have provided to us in your curriculum vitae, covering letter or portfolio.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, employment history, and qualifications.
- Any information you provide to us during an interview(s). This may include tests, case studies, presentations or other exercises completed during the hiring process.
- References, if applicable.

The legal basis we rely on for processing this personal data is article 6(1)(f) of the GDPR, which relates to processing necessary for the purposes of the legitimate interests pursued by us, namely for the purposes of the recruitment exercise.

We may also collect, store and use the following sensitive personal data:

- The information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We do not envisage that we will process information about criminal convictions, unless the position requires any such information (certificate of good conduct).

The legal basis we rely on for processing this sensitive personal data is article 9(2)(b) of the GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights.

5. How is your personal data collected?

We collect personal data about candidates from the following sources:

- You, the candidate, through the SmartRecruiters platform.
- Recruitment agencies that you, the candidate have provided your data to, and who have introduced you to us.
- Your named referees, from whom we collect the following categories of data: job title, dates of employment.
- Publicly accessible sources such as LinkedIn and Job / Employment Websites, where you, the candidate, have provided your data to make it accessible to us.

- Employee referral schemes of the Publicis Groupe or mobility programs.

6. How will we use your personal data?

We will use the personal data we collect about you to:

- Assess your skills, qualifications, and suitability for the position.
- Carry out background and reference checks, where applicable.
- Carry out the management of applications and in particular keep records related to the hiring process.
- Communicate with you about the recruitment process.
- Comply with legal or regulatory requirements.
- Communicate with hiring / interviewing managers during the process.
- Contact you about future roles, if appropriate.

Having received your application form, CV, portfolio and covering letter, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the position. If you do, we will decide whether your application allows you to be invited for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the position. If we decide to offer you the position, we may take up references before confirming your appointment.

We also need to process your personal data to decide whether to enter into a contract of employment, or for the provision of services with you.

7. If you fail to provide information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

8. Automated decision-making

In rare occurrences, you may be subject to decisions based solely on automated decision-making.

Each agency may set up customized questions, which you will be asked during the application process. For example: "Have you previously worked for a company within the Publicis Groupe network?". Your application could be rejected automatically based on your answer to these questions. These questions will be flagged. Please note that very few agencies have decided to use this process.

In such case, you have a right to obtain a human intervention, express your point of view, and contest the decision. To exercise that right, you may use the contact email specified in article 14 of this Notice.

9. Who might we share your personal data with?

Your personal data is shared between the Agencies of Publicis Groupe using the SmartRecruiters platform, in order to offer you other appropriate position for which you may be considered, or to contact you about future positions. Some of the Agencies of Publicis Groupe are located outside of the EU. All the Agencies of Publicis Groupe (whether inside or outside of the EU) respect and enforce this Notice.

We ensure all data transfers to Agencies of Publicis Groupe comply with applicable legal requirements. Should you wish to know more about how data is protected or wish to request a copy of the contractual protections please contact privacyofficer@publicisgroupe.com.

We may also share your personal data with the following third parties only for the purposes of processing your application:

- (1) SmartRecruiters our database service provider, namely for website security and maintenance purposes, learn more by reading [SmartRecruiters privacy policy](#) and [SmartRecruiters terms of use](#),
- (2) External recruitment company, namely when an Agency is working with such company when recruiting, and
- (3) In rare occasions our Clients, if they play a part in the interview process.

All these third parties are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow third parties to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

10. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. Most important, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

11. Data retention

We will retain your personal data for a period of up to 24 months after we have communicated to you our decision about whether to offer you a position. We retain your personal data for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. We also retain your data for this period because another opportunity may arise during this period which you may be suitable for.

After this period, we will securely destroy your personal data in accordance with our data retention policy. If we wish to retain your personal data on file for longer than 24 months, we will write to you separately, seeking your explicit consent to retain your personal data for a fixed period on that basis.

12. Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the recruitment process and during the retention period.

13. Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

14. Notification of changes

Should we wish to change this Notice, if you have already provided personal data, we will contact you to inform you of the new privacy notice and, in some circumstances, we may need to obtain your consent to the changes.

If you wish to save this text, please mark the entire statement (e.g. with your mouse) and copy-paste by pushing ctrl-c.

15. Contacts

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, or exercise your right to obtain a human intervention regarding the use of automated decision-making, or

If you have any questions about this privacy notice or how we handle your personal data,

Please contact:

For Agencies in Germany: yusuf.tuncay-eberl@lionresources.com

For Agencies of other countries: privacyofficer@publicisgroupe.com.

You have the right to make a complaint at any time to your national supervisory authority for data protection issues.

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