

## **Euler Hermes Group – Recruiting Privacy Notice**

As part of its recruitment activities, Euler Hermes Group S.A. (“*we*”, “*us*” or “*our*”) collects and processes your personal information (i.e. data which can be linked/attributed to an individual person, “*Personal Data*”). The privacy and protection of your Personal Data is of utmost importance to us.

This Recruiting Privacy Notice informs you as a candidate about why and how we process your Personal Data during and after your job application in accordance with the high standards of applicable data protection laws and regulations. This includes information on whom we will share your Personal Data with, how long we will retain it and which rights you have in relation to the processing.

### **1. Who is responsible for the processing of your Personal Data?**

Euler Hermes Group S.A, 1, place des Saisons, 92048 PARIS - LA DEFENSE CEDEX is the responsible data controller, that means we are the entity deciding why and how to collect and process your Personal Data in connection with your application.

If you agree that we may share your Personal Data with other companies of the Allianz Group, these other companies will also become responsible for the processing of your Personal Data. They will inform you about the way they process your Personal Data in their own privacy notices, available on their respective corporate webpage. In the event that two or more Allianz Group companies process your Personal Data in a joint manner, we kindly ask you to address queries you may have in regards to your application to Euler Hermes Group S.A. directly to the contact details as set out in Section 10.

### **2. What Personal Data do we collect?**

We collect the following types of your Personal Data in connection with your application:

- Personal information (such as your surname, first name, address, date of birth, gender, telephone number, email address, picture etc.)
- Education-related information (such as your educational history, relevant skills and degrees etc.)
- Job-related information (such as your employment history, relevant experience etc.)
- Financial information (such as your current level of remuneration, benefit entitlements etc.)
- Information in relation to legal issues (such as your work or residence permit, etc.)
- Other information (such as relevant previous convictions, etc.)

As a matter of practice, we will not collect any sensitive Personal Data about you (for example data concerning health, racial or ethnic origin or political opinions). If there is a need for us to process such sensitive Personal Data for purposes of the recruitment process with you (for example where we would need to know about any disabilities to provide a suitable workplace environment, or about relevant previous convictions), we will only process such sensitive Personal Data in strict compliance with applicable data protection laws and regulations.

Generally, we will collect the abovementioned Personal Data directly from you (for example, when you provided this information as part of your application letter, your CV or during an interview). You are not obliged to provide your Personal Data to us during the recruitment process. However, your chances of recruitment are improved if you update your profile with your current skills and interests.

In certain scenarios, additional processing in line with the purposes might be required – for example, to confirm the accuracy of the information you have submitted, request references from prior employers, or to conduct criminal background checks in accordance with applicable laws and regulations.

### **3. For which purposes do we collect process your Personal Data?**

We collect and process your Personal Data for the following purposes:

- To create and maintain your personal recruiting file, and to manage and assess your application (for example, to evaluate and confirm your suitability for the position you have applied for);
- To document, analyse and improve our recruitment process (for example, by keeping recruitment statistics)
- To present to you future employment opportunities in case your application was unsuccessful for now;
- To meet legal obligations (for example, financial and administrative obligations or checking your eligibility to work);
- Internal or external investigations where it is necessary to assess, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or our assets;
- To establish, enforce or defend against legal claims;
- To comply with law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities;

### **4. Who has access to your Personal Data?**

To manage your recruiting process, we will share your Personal Data internally with members of the HR department, interviewers involved in the recruitment process and managers in departments with a vacancy, and in each case only if access to your Personal Data is necessary for the performance of their roles.

In addition, and only when necessary to fulfil the purposes mentioned above, we will disclose your Personal Data to the following recipients or categories of recipients, as the case may be:

- Other Allianz Group companies if there is a recruiting need;
- Third party agents, service providers and advisers (for example in connection with IT services, compliance vetting, background checks, medical examinations, payments, legal advice or postal services);
- Law enforcement, government authorities or courts where necessary to comply with applicable laws;
- Other parties in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in any insolvency or similar proceedings) to the extent necessary.

We will not disclose your Personal Data to any parties who are not authorized to process them.

### **5. On which legal bases do we process your Personal Data?**

We use the following legal bases for the processing of your Personal Data:

- Your consent, where required under applicable data protection laws and regulations; in such a case, we will separately ask for your consent;
- Where the processing is necessary for us to decide about whether to establish an employment relationship with you;
- Compliance with legal obligations to which we are subject (for example, where we are legally obliged to check your work and residence permit);

- For some roles, we are obliged to seek information about criminal convictions and offences. Where this is the case, we will only do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.
- Where the processing is necessary for our legitimate interests (such as to protect our Group from harm by preventing or detecting illegal activities, fraud or similar threats; to establish, exercise or defend against legal claims; or to analyse and improve our recruitment processes, unless we determine in a case-by-case assessment that our interests are overridden by your interests or fundamental rights and freedoms).

## **6. Where will my Personal Data be processed?**

Your Personal Data may be processed both inside the European Union (“**EU**”) and the European Economic Area (“**EEA**”) and outside by the parties specified in Section 5 above. For all countries to which the data might be transferred, please click [here](#).

Please note that all countries, also within the EU or EEA, have different laws regarding the protection of Personal Data. If we transfer your Personal Data from your own country to another country, the laws and rules that protect your Personal Data in the country to which your information is transferred to may be different from those in your country and thus provide a lower data protection standard.

If you are resident of the EU or EEA and your Personal Data is transferred outside the EU or EEA, we will ensure that the recipient of the Personal Data provides for an adequate level of data protection, in particular, by implementing safeguards such as the Allianz Privacy Standard as Allianz’ approved binding corporate rules for the transfer between Allianz Group companies (further information here: <https://www.allianz.com/en/info/privacy-statement/>) or so-called standard contractual clauses approved by the European Commission (further information here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en))

## **7. How do we protect your Personal Data?**

Euler Hermes Group S.A. maintains appropriate technical and organizational security measures designed to protect your Personal Data against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. All our employees and contractual partners are bound by confidentiality and may only process your Personal Data based on the "need-to-know" principle.

## **8. How long do we keep your Personal Data?**

We will not retain your Personal Data longer than necessary to fulfil the purposes the data was collected for or to fulfil our legal obligations. Afterwards, we will delete your Personal Data.

[If your application for employment is unsuccessful, we will retain your Personal Data on file for *[enter retention period, e.g. six months]* after the end of the relevant recruitment process. If your application for employment is successful, your Personal Data gathered during the recruitment process will be transferred to your personnel file and retained during your employment.

## **9. What are your rights in respect of your Personal Data?**

To the extent permitted by applicable data protection laws and regulations, you have the following rights in relation to your Personal Data:

- Access the Personal Data we hold about you, including information such as, for example, the source and the categories of the data, the purposes of the processing, the recipients (or categories thereof) and the respective retention period;
- Request the update or correction of your Personal Data so that it is always accurate;

- Obtain your Personal Data in an electronic format;
- Request the deletion of your Personal Data if it is no longer needed for the purposes indicated above;
- Restrict the processing of your Personal Data in certain circumstances, for example, where you have contested the accuracy of your Personal Data, for the period enabling us to verify its accuracy;
- Withdraw your consent at any time where your Personal Data is processed with your consent, without affecting the lawfulness of processing based on consent before its withdrawal.

In the event and to the extent that we process your Personal Data based on our legitimate interests as set out in Section 5, you have the right to object to the processing on specific grounds relating to your particular situation. In such case we will no longer process your Personal Data unless we have compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

You may exercise the abovementioned rights by sending a request to the contact details set out in Section 10 below, providing your name, the Allianz Group company you made an application to, your email address as well as a description of your request.

If you believe we have not complied with our obligations under applicable data protection laws and regulations, you have the right to lodge a complaint with a competent data protection authority.

#### **10. How can you contact us?**

If you have any queries about our handling of the Personal Data you have submitted in your application, please contact the recruitment team via the same channel that you submitted your application. If you have any further queries about this Recruiting Privacy Notice or about how we use your personal data, you may also contact the Data Privacy Officer of the Euler Hermes Group S.A. at the following email address: [privacy.group@eulerhermes.com](mailto:privacy.group@eulerhermes.com).

In cases where we are jointly processing your Personal Data together with other company of the Allianz Group, we will forward your query to the respective company, as the case may be.