

Data protection policy for applicants

The controller is the company of the METRO Group to which you have applied for a job. If you have applied to the company specified in point 2 below, this data protection policy is applicable. For an application in another company of the METRO group, you will find the corresponding applicable data protection policy by clicking on the following link:

www.metroag.de/data-protection-notice-applicants

1. Purpose of this Policy

With this policy, METRO France (hereinafter "we" or "METRO") wishes to inform you in accordance with Articles 13 and 14 of the General Data Protection Regulation ("GDPR") about the processing of your personal data in connection with your application for a job vacancy and the subsequent recruitment process.

If you are recruited, you will receive specific information about the use of your data in the context of your employment contract.

2. Contact details of the controller

METRO France

ZA du Petit Nanterre

5 rue des Grands Prés

92024 Nanterre Cedex - France

COMPANIES REGISTER OF NANTERRE: 399 315 613

3. Contact details of the Data Protection Officer

Data Protection Officer / DPO

METRO France

ZA du Petit Nanterre

5 rue des Grands Prés

92024 Nanterre Cedex - France

COMPANIES REGISTER OF NANTERRE: 399 315 613

E-mail address: informatiqueetlibertes@metro.fr

4. Content of processing, purpose of processing and legal basis

METRO France processes your personal data in the context of your application, insofar as you provide it to us with your application documents (online, by post or by e-mail) or during the recruitment process.

Personal data (hereinafter also referred to as "data") is any information relating to an identified or identifiable natural person (for example your name, address, telephone number or date of birth).

Application documents may contain certain special categories of personal data within the meaning of Article 9(1) of the GDPR.

METRO France expressly requests that you do not send such data unless it is strictly necessary and required for the position concerned (e.g. health data such as information on a disability).

If your CV contains special categories of personal data, METRO France does not process them unless strictly required for the position concerned.

METRO France also collects data from publicly available sources (media, professional networks, etc.) and processes personal data provided by recruitment agencies used by METRO France in order to find suitable candidates for certain vacancies. When you use such third party sources, the respective terms and conditions of the third parties apply.

METRO France informs you below about the purposes for which your data are processed and the legal basis for processing your data.

a. Data processing in the recruitment and application analysis process

METRO France collects all personal data that you provide during the application process.

In addition, METRO France uses all data that METRO France has collected, in accordance with legal requirements, from public third party sources (e.g. media, career networks) and recruitment agencies (further information is provided in point d hereof). This will help to assess your skills and determine whether you are suitable for a vacancy in the company.

The personal data that must be provided by the candidate applying for an offer on the site <https://jobs.smartrecruiters.com/> are the following: last name, first name, email address.

Other data can be provided by the candidate if he/she wishes (non-compulsory data) and in particular: postal address, telephone number, professional experience, training, CV, etc

METRO France bases its decisions in the application process on the data provided which are absolutely necessary to assess your suitability for the vacancy and within the framework of the legal requirements.

For certain positions and to help in the decision making process, METRO France may ask candidates to take tests (personality assessment test, role plays, etc.). The candidate will then be informed about the method used, the objective pursued and the results.

METRO France also uses a CV scoring tool to help with the pre-qualification of applications (allowing your CV to be compared with the job offer to which you have applied). This processing aims to optimise the first stage of the recruitment process and to be able to provide a quick response to your application.

You can apply through our job portal <https://jobs.smartrecruiters.com/> and consult the job offers published there. You can apply by entering your data manually and/or by using the CV parsing function (transfer of specific data from one of your existing profiles, e.g. Smartr or Indeed).

If you do not wish to use the online job portal <https://jobs.smartrecruiters.com/>, you can also send applications to METRO France by e-mail or by post. METRO France informs you that your application data will be integrated into its application management system (dedicated computer application).

In addition, you can be recommended as a candidate for a position (cooptation system). The sponsor can send us your details and submit your application on the job portal <https://jobs.smartrecruiters.com/> so that METRO France can consider you for the position. The mandatory data transmitted concerning you during this recommendation are: your last name, first name, email address, link with the sponsor and recommendations. The optional data that can be filled in by the sponsor are: telephone number and CV.

In all cases where you have not applied directly through the job portal <https://jobs.smartrecruiters.com/>, you will receive an e-mail requesting you to activate your application. If you do not activate your application within 30 days, your data will be deleted from the applicant management system and you will not be considered in the selection process.

The legal basis for the processing of these data is Article 6, 1. b) of the GDPR.

b. Processing of data on the basis of your consent

If you voluntarily become a member of one of our candidate communities by giving us your consent, the data you provide will be published to all authorised METRO France HR staff.

By becoming a member of the candidate community, you agree to be informed about job offers and events that interest you. This can be done by e-mail, SMS or telephone.

Furthermore, by becoming a member, you agree that we may offer you other suitable vacancies within the METRO Group and pass on your details to the METRO Group company offering the position.

You can also become a member by applying for a job that explicitly states that it is a candidate community.

You may withdraw your consent at any time by sending a request to the Data Protection Officer's contact details as set out in point 3 hereof.

METRO France may also ask for your consent to take up references. In this situation, METRO France expressly asks for your consent and the persons to be contacted (last name, first name, email, telephone number).

The legal basis for the processing of these data is Article 6(1)(1)(a).

c. Proactive search for suitable candidates and provision of job opportunities

METRO France (i) collects personal data from publicly available sources (e.g. media, professional networks) or (ii) processes personal data provided by its recruitment agencies in order to find suitable candidates for vacant positions in the company.

METRO France uses this personal data only to assess the applicant's skills, to determine whether the applicant is suitable for a vacancy in the company and to invite the applicant to apply for the corresponding position.

Data from professional networks will only be processed in accordance with the respective terms and conditions of the relevant network operator, limited to the information you have provided about yourself on publicly accessible professional networks or online platforms.

The personal data of the collected applicant shall include – if and to the extent provided – the information set out in point a. hereof.

The legal basis for the processing of this data is Article 6(1)(1)(a) of the GDPR and/or Article 6(1)(1)(f) of the GDPR.

5. Sources

Data that METRO France has not collected directly from you is collected by METRO France from the following sources:

- Your former employers, if you have agreed to METRO France contacting them during your recruitment process,
- Publicly available data (e.g. media, career networks),
- Recruitment agencies.

6. Recipients of your data

Internal recipients within METRO France:

When submitting your application through the job portal <https://jobs.smartrecruiters.com/>, authorised employees of the company have access to your data.

This includes staff in the Human Resources department, those responsible for the job advertisement and its content (future manager and staff involved in the recruitment process/interviews) and those in the IT department where appropriate. Please note that when you apply through the job portal, the future manager can see all the positions you have applied for.

For support and information purposes, the system administrators of METRO AG (holding company of the METRO Group) may also access your data, for example to check the status of your profile or, if you wish, to delete your data. For this purpose, you can access your profile and the application you have submitted.

External recipients of METRO France:

The categories of external recipients of your personal data are:

- The IT Department and/or IT solution provider(s)
- Data destruction/archiving/hosting companies
- Public Authorities and/or Administrations
- Lawyers and/or legal advisors
- Recruitment agencies,
- Social media and networks
- Companies offering candidate assessment tests.

7. Transfers to third countries

Your personal data will only be transferred to countries outside the EU or EEA ("third countries") (i) if a transfer is required by law (e.g. tax reporting obligations) or by contract, (ii) if you have given your consent or (iii) if METRO France uses the services of processors.

If a processor is located in a third country and there is no adequacy decision, whereby the EU Commission has decided that the third country concerned ensures an adequate level of protection, the data transfer will be based on appropriate safeguards, i.e. standard contractual clauses. Further information or copies of these safeguards can be requested without a form to the Data Protection Officer using the contact details mentioned above.

8. Retention period

METRO France stores and processes your personal data for the duration of the application process.

If METRO France does not recruit you, your data will be deleted two years from the date you receive the information that you are not selected.

If your application has been successful and METRO France establishes an employment relationship with you, the data collected during the application and recruitment phase will be retained for 6 months after your employment.

If you have been the subject of a **recommendation/cooptation** and/or if you have made an **unsolicited application** and/or if METRO France contacts you following the **collection of your data via third party sources** (networks, etc.), you will receive a request to confirm your interest in the position concerned and to activate your application. If you do not respond to this request, METRO France will delete your profile and data within 30 days of receiving the request.

Your data will be deleted immediately if you respond to this confirmation request by indicating that you are not interested in the position.

9. Your rights as a data subject

As a data subject, you may contact the Data Protection Officer of METRO France at any time at the contact details mentioned in point 3 hereof to exercise your rights in accordance with the GDPR. These rights are as follows:

- The right to receive information about the processing of data and a copy of the data processed (right of access, Article 15 of the GDPR),
- The right to demand the rectification of inaccurate data or the completion of incomplete data (right of rectification, Article 16 GDPR),
- The right to demand the erasure of personal data and, where personal data have been made public, to inform other controllers of the erasure request (right to erasure, Article 17 of the GDPR),
- The right to demand the restriction of data processing (right to restrict processing, Article 18 of the GDPR),
- The right to receive personal data concerning the data subject in a structured, commonly used and machine-readable format and to request the transmission of such data to another controller (right to data portability, Article 20 of the GDPR),
- The right to object to the processing of data in order to stop it (right to object, Article 21 of the GDPR),
- The right to withdraw consent at any time to stop processing data based on your consent. Withdrawal will not affect the lawfulness of processing based on consent prior to withdrawal (right to withdraw consent, Article 7 of the GDPR).
- The right to lodge a complaint with a supervisory authority if you consider that the processing of data constitutes a breach of the GDPR (right to lodge a complaint with a supervisory authority, Article 77 of the GDPR).

10. Automated decision making/profiling

METRO France does not use automated decision making or profiling.

Due to possible changes in the processing described herein and/or in the applicable regulations, a change to this data protection policy may be necessary. In this case, METRO France will inform you of such changes. To the extent that the changes affect processing that is based on your consent, METRO France will ask you for new consent, if required.