

## PRIVACY POLICY CANDIDATES

### 1. IDENTIFICATION AND INFORMATION

This privacy policy is intended to inform you about the processing of personal data within the framework of a candidacy and the implementation of the selection process. The data controller is the METRO group company in which you have applied for a specific position.

In accordance with the provisions of current data protection regulations, the Candidate is informed that the personal data provided through the different channels will be processed by por **VALENCIA TRADING OFFICE, S.L.** . with registered office Av. del Mediterraneo, 8, Valencia (Albuixech), España, con NIF nº B-28647451 (hereinafter, “**VTO**”).

You can consult any data protection question at any time by contacting our DPO at the addresses indicated and/or by e-mail: [yto.dpo@metro-ito.com](mailto:yto.dpo@metro-ito.com)

### 2. PURPOSE OF THE TREATMENT AND LEGAL BASIS

The personal data you provide us, both in the forms provided through the different channels, as well as during the selection process, the face-to-face and/or online interview, as well as the motivation and aptitude test, will be processed to manage the selection process and, where appropriate, to manage the formalization of the employment contract, being the legitimizing basis the execution of the pre-contractual relationship.

If requested, you can register as a member of our community of candidates, the legitimizing basis of such treatment being your express consent. As a member of our community, we will send you information about job offers that may be of interest to you, and we will keep your CV so that we can include you in selection processes for new vacancies that fit your profile.

In addition, by becoming a member, you agree that we may consider you for other suitable vacancies within the METRO group and send your data to the respective company offering the vacancy. You can also become a member by requesting a job advertisement that explicitly states that you are a community of applicants.

You can cancel your subscription in the community, as well as revoke the rest of the consent granted at any time, by contacting the address indicated in the Exercise of Rights section at any time by sending a message to the contact details above.

Your data will be kept only for the duration of the selection process, unless you expressly authorize us to keep them for a longer period, in order to inform you of future vacancies that may be of interest to you.

### 3. CATEGORY OF DATA AND INTERESTED PARTIES

The categories of data that are processed are:

- Identification data (name and surname, D.N.I./N.I.E., image).
- Contact details (location, postal address, telephone number, email).
- Data on personal and social characteristics: date of birth, nationality, privileges and authorizations, hobbies,
- Academic and professional data: Curriculum Vitae, including information related to training, qualifications, professional experience, membership of professional associations or associations, employment status, professional skills,
- Commercial information data (activities or businesses, commercial licenses, subscriptions to publications or media, literary, artistic, scientific or technical creations).

We do not intentionally process special categories of personal data, (health, ideological, etc.). We expressly request that you do not send us such data, unless required by the individual position. By voluntarily submitting this data, you agree to the storage process as part of the selection process.

The only category of interested parties to be treated are candidates for **VTO** vacancies.

#### **4. COMMUNICATION OF DATA**

The data collected by **VTO** will not be transferred to third companies, except in those cases in which it is decisive by legal requirement and therefore results in a treatment based on compliance with a legal obligation, among which could be Public Administrations, as well as Courts and Tribunals.

In the event that you submit an application for management positions, we inform you that your data may be communicated to entities of the METRO Group, to carry out evaluations on the candidacy, such treatment being in charge of the treatment.

We process your personal data to comply with legal obligations to which we are subject. On this basis, it may be necessary for us to pass on your data to third parties (e.g. authorities) in order to comply with legal information, reporting or disclosure requirements. In addition, we may process your data to assert, exercise or defend legal claims, in particular claims for discrimination, and to transmit them to third parties (e.g. lawyers, courts, tax authorities).

The legal basis for the processing of this data results from Art. 6 para. 1 sentence. 1 lit. lit. c) of the GDPR and Art. 6 para. 1 sentence. 1 lit. lit. f) GDPR. Our legitimate interest lies in the correct assertion and enforcement of legal claims, as well as in defending against legal claims brought against us and in preventing any damage to our company. Your personal data (e.g. name, date of birth) that you have provided to us will be checked by us against the EU sanctions lists established by EU Council Regulations. We are legally obliged to ensure that we do not grant any financial benefit to the beneficiaries listed in the EU Council regulations. Data processing is therefore based on Art. 6 para. 1 sent. 1 lit. lit. c) GDPR. These controls also allow us to benefit from certain customs procedures, which are in our legitimate interest. Therefore, such processing is also based on Art. 6 para. 1 sent. 1 lit. lit. f) GDPR.

Likewise, **VTO** has the collaboration of third-party service providers who may process your personal data for the sole purpose of complying with the purposes indicated, as well as with legal obligations, without in any case the latter having their own purposes, that is, they treat data as data processors. Among them, you can find providers of database management services, computer support, human resources management and selection and hiring of personnel.

It may turn out that some of these providers are located outside the European Economic Area, specifically in the United States. In this case, we inform you that the international transfer of data has the necessary guarantees, and is regularized in accordance with the Standard Contractual Clauses approved by the European Commission. You can request further information, as well as a copy of the Standard Contractual Clauses through our data protection officer, using the contact details mentioned in clause 1.

#### **5. DATA SOURCE**

Your personal data may have been obtained through:

- online employment platforms (InfoJobs, LinkedIn),
- Head Hunters,
- the interested party sending his application by email
- Third party that recommends your file and CV, as long as you guarantee to have your express consent for such communication

Through our candidate portal you can apply directly. . You can apply there by leaving your details for the advertised job and thus submitting your individual candidate profile for the respective position. Likewise, you have the option to send us your data through a link to your professional social network profile (Smartr or LinkedIn) by entering manually and / or using "CV analysis". Therefore, we will use the personal data collected in your profile of this professional social network to carry out your evaluation as a candidate.

If you send us your application by e-mail or post, the details of such applications will be processed by our recruitment team and your data will be included in our application management system.

In addition, you may be recommended as a candidate for a position. With your consent, the sender can transmit your data to us and submit your application documents on our job portal so that we can consider you for the position.

In those cases in which you have not applied directly through our job portal for a position that is published on the job portal (e-mail, postal mail or we have received your data from a third party), you will receive an email, so that you can activate your application. If you do not activate your application within 30 days of receiving the email, we will not be able to process your application and we will proceed to delete your data.

We (i) collect personal data from sources open to the public (e.g. media, professional networks) or (ii) process personal data provided by our recruitment agencies in order to find suitable candidates for open positions in our company. We use this personal data only to assess the candidate's qualifications, determine whether they are suitable for a vacant position in our company and invite the candidate to apply for the relevant position. Data from professional networks is only processed in accordance with the respective conditions of the respective network operator, limited to information you have provided about yourself on publicly accessible online networks or platforms with a professional approach.

The candidate's personal data collected includes, if and to the extent provided, the information set out in clause 2 above.

The legal basis for the processing of this data results from Art. 6.1 a) GDPR and; Art. 6.1 f) GDPR.

## **6. PERSONAL DATA OF THIRD PARTIES**

In the event that personal data of third parties is provided, through the section "refer a friend", you must undertake to inform of this privacy policy and in general of the terms set forth here and obtain the consent of said third party for the processing of your personal data.

## **7. SECURITY MEASURES**

**VTO** and its service providers will treat all personal data provided under the strictest confidentiality and keeping the mandatory duty of secrecy with respect to them, applying the security, technical and organizational measures that correspond in accordance with the applicable legislation and that guarantee the security of the data and avoid its alteration, loss, unauthorised processing or access, taking into account the state of technology, the nature of the data stored and the risks to which they are exposed.

## **8. AUTOMATED DECISION-MAKING AND PROFILING**

Stakeholders are informed that automated decisions will not be made.

On the other hand, due to the incorporation of the Curriculum Vitae to the selection process and the tests in which it participates, **VTO** will elaborate profiles that adapt to the position offered and proceed to the selection of the personnel according to their abilities, as well as promotion and / or professional career

## **9. RETENTION PERIODS**

Your personal data for the duration of the application process. If you are not selected, we will delete your data six months after completing the requested selection process, unless you expressly authorize us to keep them for a longer period, in order to inform you of future vacancies that may be of interest to you, becoming part of our community of candidates. In this case we will keep your data until your consent is revoked.

If you have applied for an executive position and have not indicated otherwise, we consider the application in general as an application for any comparable role in the METRO group of companies. For executive searches, we consider that the related application processes are not complete until then, each position for the respective role is filled within the METRO group of companies.

Notwithstanding the foregoing, it may be the case that it is necessary to keep your data (blocked), until the prescription of possible responsibilities that may arise from the processing of data.

In case you are employed, you will be sent due information about the processing of your data, including the periods of conservation of your data that will apply from there.

## **10. EXERCISE OF RIGHTS.**

As the owner of the data, the User can exercise the rights recognized in the data protection regulations, at any time and free of charge, by writing to the address indicated in the header of this Privacy Policy, attaching a photocopy of your identity document, or another document that allows to identify the identity of the User.

### **Right of Access:**

You have the right to be informed by **VTO** about whether or not it is processing your personal data and, if so, to be able to access such data and receive information about the purposes for which they are processed, the categories of data affected by the processing, the recipients to whom, if any, your personal data were communicated and the expected period of conservation of the data, among other information.

### **Right of Rectification and Deletion:**

You have the right to request the erasure of personal data provided that legal requirements are met, and the rectification of inaccurate data concerning you when, among other reasons, these are no longer necessary for the purposes for which they were collected.

### **Limitation of processing, revocation of consent and total or partial opposition to processing:**

In certain circumstances (for example, in case the applicant contests the accuracy of their data, while the accuracy of the same is verified), you can request that the processing of your personal data be limited, these being only processed for the exercise or defense of claims.

You also have the right to revoke the consent given and to object to the processing at any time, on grounds relating to your particular situation, where the processing is based on our legitimate interest or the legitimate interest of a third party (including processing for direct marketing and profiling). In this case, **VTO** will cease processing, unless proof of legitimate reasons.

### **Portability of your data:**

You will have the right to receive the personal data you have provided to **VTO** in a structured, common and machine-readable format, and to be able to transmit them to another data controller without being prevented from doing so by the person responsible for them, in the cases legally provided for this purpose.

### **Automated individual decisions:**

Furthermore, in addition to the aforementioned rights, in the event of automated decision-making, including profiling, you have the right to obtain human intervention from **VTO** and to express your point of view and to challenge the decision.

### **Other:**

Similarly, where personal data are transferred to a third country or to an international organisation, you have the right to be informed about how a copy of the appropriate safeguards relating to the transfer can be accessed or obtained.

Likewise, you may file a claim regarding the protection of your personal data with the Spanish Agency for Data Protection at the address C / Jorge Juan, 6, 28001 - Madrid, when the interested party considers that **VTO** has violated the rights that are recognized by the applicable data protection regulations.

**Last update: March 2023**