

Candidate Privacy Policy

Europcar

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Applicable date: 03/01/2022

Latest update: 31/03/2023

This Privacy Policy defines the principles on which we process Personal Data from candidates for employment at Europcar.

1. Who processes your personal data?

Europcar Danmark, whose registered office is located at Jens Baggesens Vej 90 N, 8200 Aarhus N is the "Data Controller" of your Personal Data collected and processed in order to manage your job application.

The terms "Europcar", "we", "us" or "our" that we use in this policy refer to Europcar Danmark. Europcar Danmark is a member of the Europcar Mobility Group. The term "our Group" refers to Europcar Mobility Group.

When you communicate Personal Data to us or when we collect Personal Data about you, we undertake to use it in accordance with this Policy.

2. What Personal Data do we collect about you?

As an employer in the sector of vehicle rental, we collect Personal Data in the course of your recruitment process.

By Personal Data, we mean not only data that identifies you directly, but also data that identifies you indirectly.

In connection with your application, we will collect use and store the following categories of Personal Data about you:

- Identification data: surname, first name, email address, birth date, telephone number, postal address, gender
- Education history: education level, institution; program, records, diploma and, if necessary, test results
- Professional and employment information: Application, curriculum vitae /resume; experience; letters of reference; references, work history etc.
- Details of the type of employment you have and you are looking for (current and/or desired position, salary and other job preferences);
- Other Information collected during interviews, personality and competency assessment tests and collected from references, if applicable.
- IT data /Digital activity data (IP address, logs, etc.)
- Certificate of criminal records if relevant

We may collect your Personal Data, directly from you during your recruitment process (by fulfilling a form, by entering contact details, by navigating to our external recruitment websites, etc.) or indirectly for those Personal Data from third parties in particular from professional social medias, temporary agencies and headhunters.

If you decide to create your profile on our recruitment website using a third party website (like a professional website), we may collect the data that you choose to link using this option.

We might request contact details of one or several person(s) as reference(s). We thank you to inform this/these person(s) that you have shared their contact details with us and that we could contact them for reference check.

3. For what purposes do we process your Personal Data?

We collect and process your Personal Data for various purposes and on the following legal bases:

Purposes of the processing	Legal basis of the processing
Asses your skills and qualifications against our career opportunity	These processing are based on the execution of pre-contractual measures adopted at your request cf. GDPR article 6(1)(b).
Communicate with you about the recruitment process and your application	
Verify information provided by you and checking your diploma and references	This processing is based on our legitimate interest to verify the authenticity of your diploma and to check your references cf. GDPR article 6(1)(f).
Assess you on the basis of personality and competency assessment tests.	This processing is based on your consent cf. GDPR article 6(1)(a).
Contacting one or several person(s) as references	This processing is based on your consent cf. GDPR article 6(1)(a).
Verify that you are not recorded on a Sanction List (namely any list of designated individuals as issued and amended from time to time by: (a) the U.S. government, including OFAC's list	As these regulations shall applies for our group it is mandatory for Europcar Mobility Group and its subsidiaries to process your personal data:

<p>of Specially Designated Nationals and Blocked Persons (or “SDNs”) and lists maintained by the U.S. Department of State; (b) the United Nations Security Council, (c) the European Union and any Member State (including the EU’s consolidated list of persons subject to EU financial sanctions); and (d) the United Kingdom (including the consolidated list of financial sanctions targets issued by the UK’s Office of Financial Sanctions Implementation (“OFSI”))</p>	<p>- for complying to above mentioned laws and regulations cf. GDPR article 6(1)(c) and (f).</p> <p>- the “legitimate interest” of Europcar International in ensuring that it and its subsidiaries are compliant with the International Sanction regime, as applying this regime is part of the applicable requirements to trade with some foreign countries.</p> <p>Such verification is required for the conclusion of employment agreements with you cf. GDPR article 6(1)(c) and (f).</p>
<p>Checking criminal conditions through obtaining your certificate of criminal records.</p>	<p>This processing is based on the Danish law: “databeskyttelsesloven” § 8, stk. 3</p>
<p>Inform you of other potential career opportunity(ies) at Europcar or within our Group</p>	<p>This processing is based on your consent to be part of our CV-bank and to be contacted for future opportunities within the Group cf. GDPR article 6(1)(a).</p>

4. Who are the recipients of your Personal Data?

4.1 Categories of recipients

Your personal data may be communicated:

- a. to our employees. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy, if access to the data is necessary for the performance of their roles. If you consent to the fact that we keep your Personal Data for future opportunities within the Group, your Personal Data could be shared with HR and recruitment teams with other entities of the Group, if your profile could match one opened position.
- b. to our subcontractors, in particular our IT service providers for hosting, maintenance or development purposes. These may be entities that are members of our Group or external service providers;

We don’t share your Personal Data with an external third party, unless we are required to do so, under a European or local regulation.

4.2 International transfers

The application process does not involve international data transfers, including transfers to countries outside the European Economic Area which do not have data protection laws as strict as those in Denmark.

5. How long do we keep your Personal Data?

Purposes of the processing	Data Retention
Asses your skills and qualifications against our career opportunity	If you are hired in a position at Europcar, we will retain your information provided during the application and recruitment process as part of your employee record. If you are not considered for the position, we will store your application and other information that you have provided us with, until the end of the recruitment process and hereafter for a period that we find your application to be of relevance to us, but never longer than 6 months.
Communicate with you about the recruitment process and your application	
Verify information provided by you by checking your references	
Assess you on the basis of personality and competency assessment tests	The information will be stored during the recruitment process and hereafter for a period that we find your application to be of relevance to us, but never longer than 6 months. If you are hired in a position at Europcar, we will store your personal data for the duration of your employment with the company and for up to 5 years after your departure from the company.
Contacting one or several person(s) as references	This information will be store for the time of your recruitment process.
Verify that you are not recorded on a Sanction List (namely any list of designated individuals)	5 years from the date of collection of your Personal Data, if you are registered on such a list.

Checking criminal conditions through obtaining your certificate of criminal records.	The information is stored for up to 6 months if you are not considered for the position.
Inform you of other potential career opportunity at Europcar or within our Group	2 years from the date of collection of your consent (if we request a renewal of your consent and if you agree, we will store your Personal Data for 2 more years)

6. What rights can you exercise regarding the processing of your Personal Data?

Within the limits and conditions allowed by the regulations in force, you can:

- **access** to your Personal Data and obtain further information on the characteristics of the processing we carry out;
- have your Personal Data **corrected, updated and deleted**, it being specified that deletion can only be carried out when (i) the data is no longer necessary in relation to the purposes for which it was processed, (ii) you withdraw your consent and there is no other legal basis for the processing, (iii) you object to the processing of your personal data and there is no compelling legitimate reason for the processing (iv) it has been established that your personal data has been processed unlawfully, (v) the personal data must be deleted in order to comply with one of our legal obligations
- you **object** to the processing of your Personal Data based on legitimate interest, which you can check by taking a look the table shown in the part “For what purposes do we process your Personal Data” and in particular the column “Legal basis of the processing”
- **receive** the personal data you have provided us with or request us to pass them on to a third party when the processing of your personal data (i) has been carried out by automated means and (ii) is based on your consent or on the execution of a contract binding us
- request the **limitation of the processing** of your Personal Data, which means that we will not be able to use your Personal Data for a defined period of time. You can exercise this right when:
 - a) you dispute the accuracy of your personal data for a period of time that allows us to verify the accuracy of your personal data;
 - b) the processing of personal data is unlawful and you object to the deletion of your personal data and instead demand that its use is restricted;

c) we no longer need your Personal Data but they are still required for the establishment, exercise or defence of legal claims;

d) you object to the processing for reasons relating to your particular situation, while we are checking whether the legitimate reasons pursued by us take precedence over your own.

- **withdrawing** your consent to processing activity based on your consent

- **submit a complaint** to a Supervisory Authority. In Denmark, the Supervisory Authority is The Danish Data Protection Agency (Datatilsynet), Carl Jacobsens Vej 35, 2500 Valby, with the homepage: datatilsynet.dk.

7. How do you exercise your rights?

You can write an email to the following address: dpo@europcar.com. You can also send a letter to 13 Ter Boulevard Berthier 75017 Paris, France.

Please be sure that you mention in your request information to identify yourself as for example you name, surname, contact details, the position for which you applied for, the date of the interview(s) etc.

8. Changes to this Privacy Policy

We may change this policy from time to time in order to reflect the changes in our practices and also to remain compliant to data protection laws and regulations.

If you consent to the fact that we keep your Personal Data for future applications, we will inform you of any substantial modification on how we process your Personal Data.

We will post any changes to this policy on this page. Each version of this policy is identified by its effective date.