

APPLICANT CONFIDENTIALITY POLICY



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The present confidentiality policy (the “**Confidentiality Policy**”) is intended to inform **applicants** (hereinafter the “**Applicants**”) of the methods of **collecting, processing, and retaining** their **Personal Data** as part of the recruitment process, including via the Careers website <https://www.suez.fr/fr-fr/carrieres>, as well as the rights they hold and how they **can exercise them**.

Within the meaning of the **General Data Protection Regulation (GDPR)**, “**Personal Data**” means any information relating to an identified or identifiable natural person, directly or indirectly. This notably includes:

- **Identification data:** last name, first name, online identifier, etc.
- **Contact details:** email address, postal address, telephone number
- **Data relating to the personal or professional situation:** background, skills, experience, etc.

This Policy is established in compliance with **European data protection law**, in particular **Regulation (EU) 2016/679 of 27 April 2016 (the “GDPR”)**, which has applied since **25 May 2018** in all EU Member States.

The present Policy may be modified at any time by SUEZ, particularly to remain compliant with any regulatory changes

1 Identification of Controllers

The Personal Data of Applicants collected are processed by SUEZ SA, registered with the Nanterre Trade and Companies Register under no. 433 466 570, whose registered office is located at Altiplano, 4 Place de la Pyramide, 92800 PUTEAUX (France), in connection with making the Careers website available. This site is provided for its own account and for the entities and subsidiaries that are part of the SUEZ Group (hereinafter individually an "Entity," collectively the "**Entities**" or the "**Controller**") as regards recruitment management. Thus, except for job postings concerning SUEZ SA, the latter acts as a processor for the other Group Entities with respect to making the Careers website available.

In the context of Personal Data processing carried out for recruitment management and the job postings offered, each Entity acts as the Controller for the recruitment for which it is the employer. Each Controller undertakes to strictly adhere to the **GDPR** and the local law applicable in each country, namely, for the French entities of SUEZ, Law No. 78-17 of January 6, 1978, on IT, files, and liberties as amended by the law of June 20, 2018, and Implementation Decree No. 2019-536 of May 29, 2019 (the "**Regulation**")

2 Description of Processing

2.1 Purpose of Processing

As part of recruitment management, the Entities may process Applicants' Personal Data. The primary purpose of this processing is to assess an applicant's ability to hold a position, and more specifically:

- **Searching for and receiving relevant profiles, including:**
 - Providing a site that allows applications to be submitted and transmitted to the relevant Entities.
 - Providing a platform allowing Applicants, if they so wish, to create an individual account.
 - Taking part in job-fair type events.
 - Reviewing unsolicited applications.
 - Direct outreach to potential candidates (e.g., sourcing).
- **Pre-selection of candidates** to assess their ability to hold a position and measure their professional aptitudes, including:
 - Receiving and sorting résumés/CVs, cover letters, and any documents submitted by the applicant.
 - In certain cases, and subject to the applicant's prior written consent, conducting reference checks with former employers.
 - In some cases, administering personality assessments.
- **Contacting the applicant:**
 - Managing in-person, telephone, and video interviews.
 - Managing communications and exchanges by email, SMS, and phone.
- **Building a talent pool**, enabling the applicant to be recontacted for new openings, where applicable.

- **Managing the defense of SUEZ's** interests in legal proceedings.
- **Handling requests to exercise data rights**, notably to verify the Applicant's identity, track the request, and respond within statutory deadlines.

2.2 Categories of Collected Data:

Within the meaning of the Regulation, "**Personal Data**" means information relating to an identified or identifiable natural person. This includes, for example, **the last name, first name, email address, or mailing address**.

Applicants' Personal Data is collected:

- Directly from the applicant, notably when they:
 - apply via the Careers website,
 - complete a contact form on a site belonging to one of the Entities,
 - send an unsolicited application by any other means,
 - submit their application at a job fair or recruitment event.
- Indirectly, notably when:
 - the applicant applies via a partner job board (e.g., Hellowork),
 - responds to outreach via a professional social network,
 - is contacted by a recruiter or a partner acting on behalf of one of the Entities.

The Personal Data likely to be processed as part of recruitment management include:

CATEGORIES OF DATA	EXAMPLES OF DATA
Identity and contact details	Last name, first name, email address, telephone number
Data relating to professional life and previous employment	Personal data contained in a résumé/CV and a cover letter; start and end dates of previous jobs; positions held; company names
Data relating to training at the time of application	Degree title, year, level of qualification
Assessment of the applicant's aptitudes and skills	Declarative data from the applicant's answers during interviews and exchanges conducted by various means

When an Applicant agrees to be included in the Talent Pool at the time of submitting their application, only **the data strictly necessary** for this purpose are retained, namely:

- **Last name**
- **First name**
- **Curriculum Vitae (CV)**

In accordance with Section 3, this data is retained in the Talent Pool for a defined period. At the end of that period, **all other personal data** collected during the application process are **automatically anonymized**, thereby ensuring compliance with the principles of data minimization and storage limitation.

2.3 Legal Grounds for Processing Data

Legal grounds for processing Applicants' Personal Data are as follows:

PURPOSES OF PROCESSING	LEGAL BASIS <i>(allowing SUEZ to process Personal Data)</i>
Searching for and receiving relevant profiles	In the course of its recruitment activities, the Entity processes applicants' Personal Data on the basis of its legitimate interest, in order to identify profiles that match the needs of an open position.
Selecting candidates	As part of its recruitment process, the Entity selects candidates on the legal basis of taking pre-contractual measures with a view to potentially concluding an employment contract. This processing aims to identify relevant profiles, assess their ability to hold the proposed position, and evaluate their professional aptitudes.
Contacting candidates	As part of its recruitment activities, the Entity processes Applicants' Personal Data on two distinct legal bases: • Where the applicant voluntarily applies, processing is based on the performance of pre-contractual measures, with a view to potentially concluding an employment contract. • Where the Entity initiates contact with a candidate by other means (e.g., via professional networks or recruitment firms), processing is based on its legitimate interest in identifying profiles suited to its needs. In both cases, the purpose of the processing is to evaluate the applicant's ability to hold a position and to measure their professional aptitudes.
Building a candidate talent pool	During its recruitment activities, the Entity may build a candidate talent pool based on the candidates' explicit consent , in order to contact them subsequently about other professional opportunities that match their profile.
Defense of interests in legal proceedings in the event of litigation	In managing recruitment, the Entity may process certain Applicants' Personal Data based on its legitimate interest , to preserve its rights or to ensure its defense in judicial proceedings, in accordance with the Regulation.
Handling requests to exercise data rights in accordance with the Regulation	In accordance with applicable personal data protection law, each Entity must enable Applicants to exercise their rights (access, rectification, erasure, objection, restriction, portability, etc.). This processing is carried out on the legal basis of compliance with a legal obligation.

2.4 Who we share the Data with

INTERNAL DEPARTMENTS AT SUEZ

Personal Data are shared with authorized persons within the “Human Resources” departments of each Controller, and with authorized persons within other internal departments responsible for performing “human resources” processes and managing recruitment, such as hiring managers.

In certain cases, other SUEZ Group Entities may access your Personal Data, such as the parent company SUEZ SA and, more specifically, the Information Systems Department with respect to the provision of the IT tools used in recruitment, the Human Resources Department, and the Legal Affairs Department in the event of litigation or a request related to the protection of your Personal Data

SUBCONTRACTORS

SUEZ Entities use subcontractors for the management of job postings and applications:

- IT service provision
- External recruitment firm
- Personality assessment tools

Subcontractors access Personal Data solely for the performance of the services entrusted to them by the Entities.

They undertake to:

- Process Personal Data exclusively in accordance with the Controller’s documented instructions.
- Observe a strict duty of confidentiality.
- Implement appropriate technical and organizational measures to ensure the security and protection of Personal Data, in accordance with applicable regulations.

AUTHORITIES AND PUBLIC BODIES

In accordance with the applicable Regulation, an Entity may be required to disclose certain Personal Data to administrative or judicial authorities, notably in the context of an audit or to comply with a legal obligation. In addition, the Entities reserve the right to process and disclose certain Personal Data where necessary to protect their legitimate interests, particularly in the context of legal proceedings or to safeguard their rights

TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

Entities may transfer Personal Data outside the European Economic Area in connection with the IT tools used for recruitment management.

Where the User’s data is transferred to a SUEZ Entity or a third-party recipient located outside the European Union, the Entities ensure that the destination country is subject to an adequacy decision by the European Commission providing a level of protection equivalent to that applicable within the European Economic Area.

Otherwise, the Controller undertakes to frame the transfer with appropriate safeguards, such as the European Commission’s Standard Contractual Clauses

If the User wishes to obtain more information on how the Controller protects their data, or to receive a copy of the legal instruments implemented, they may send a request to: talentup@suez.com.

3 Data retention periods

Personal Data are stored in accordance with the legal provisions in force in the country concerned by the processing¹.

In France, data collected as part of recruitment are stored by SUEZ on an active basis for the time necessary to evaluate the application and for a maximum duration of **two (2) years**² (or any shorter period specific to the country concerned) from the closure of the position and the application to which the candidate had applied.

Fifteen (15) days prior to the expiration of this two (2) year period, the applicant will receive an automatically generated email informing them of the impending deletion of their data, unless they actively intervene via their user profile. In that case, the applicant's profile data and attachments will be automatically stored for a new maximum duration of two (2) years³.

If no new connection is established by the applicant within this fifteen (15) day period, or if no action is taken on their part via their User profile, the Personal Data relating to the applicant's profile will be anonymized and the associated attachments will be deleted. As a result, the applicant will no longer be able to be contacted for any future opportunities.

4 How Applicant can exercise their rights

What are your rights?

In accordance with the applicable personal data protection Regulation, you have the following rights:

Right to access: You have the right to obtain **confirmation as to whether your personal data are being processed** by the Entity. Where that is the case, you may access that data and receive information on the characteristics of the processing carried out by the Entity. You may also request a **copy of your personal data**. If requested electronically, the copy will be provided in a commonly used electronic format, unless you request otherwise. Reasonable fees may be charged for any additional copies.

Right to correct You may **request the correction of your personal data if they are inaccurate, incomplete, or out of date**. To ensure the accuracy of your information, you are recommended to update your profile directly via the Talent'Up platform.

Right to erasure: You may **request the deletion of your personal data**, notably where they are no longer necessary for the purposes for which they were collected or processed, for example, at the end of an application process.

The Entity is required to erase your data where one of the following applies:

- The data is no longer necessary for processing purposes.
- You withdraw your consent and no other legal basis justifies the processing.
- You challenge the processing and there are no overriding legitimate grounds for it.
- The data has been processed unlawfully.
- Erasure is required to comply with a legal obligation.
- The data was collected in connection with services offered to minors.

This right does not apply where processing is necessary for the establishment, exercise, or defense of the Entity's legal claims.

Right to limit processing: You may request that the use of your **personal data be temporarily frozen**, when:

- You exercise your **right to correct**: processing may be limited while the Entity verifies the accuracy of the data.
- You exercise your **right to challenge processing**: processing may be suspended while the Entity examines whether its legitimate interests override yours. • The data are no longer needed by the Entity, but you require them for the establishment, exercise, or defense of legal claims.

During this restriction period, the data concerned **may not be used**, except where:

- You give your consent.
- They are required for legal reasons or to protect another person's rights; or
- For important reasons of public interest.

This right allows you to control the use of your personal data while a request is being processed, while ensuring their preservation.

Right to challenge processing: You have **the right to challenge, at any time and on grounds relating to your situation**, the processing of your personal data based on the Entities' legitimate interests, including profiling.

The Entity will then cease processing unless it can demonstrate **compelling legitimate grounds** that override your rights and freedoms, or if processing is necessary for the establishment, **exercise, or defense of legal claims**.

This right **does not apply** to processing necessary for the performance of **pre-contractual measures**, such as the voluntary submission of an application.

Right to data portability: You may request the retrieval of your personal data or ask an Entity to transfer your personal data if:

- Your personal data are subject to automated processing; and
- The processing of your personal data is based on consent or the performance of pre-contractual measures for a contract.

Right to set general and specific directives defining how you intend your rights to be exercised after your death.

How to exercise your rights?

1. Managing your Personal Data via your profile

The User who has created a profile may manage it autonomously directly from their external candidate space.

To do this, they must log in to their account. Once on their profile, they may at any time:

- **Edit and correct their profile:** The User can update, from their personal space, their personal information, contact details, professional experience, and other data they have provided.

- **Deactivate and anonymize their profile:** If the User wishes to deactivate their account and anonymize their data, they simply need to go to the bottom of their profile page and tick the box provided for this purpose: “Deactivate and anonymize your account.” This action will result in the deletion or anonymization of their Personal Data, in accordance with applicable regulations.

When the User chooses to deactivate and anonymize their account and/or requests it, it is important to understand the consequences of this action. Anonymizing their profile will permanently delete all of their applications and their profile, and it will not be possible to recover their profile later.

2. Managing your Personal Data by sending a request to the relevant Entity

In accordance with the Regulation, the User may exercise their rights via the **contact form** available on suez.com, by e-mail at talentup@suez.com or by post to SUEZ, Direction des Ressources Humaines, Altiplano, 4 Place de la Pyramide, 92800 PUTEAUX (France), stating:

- The **name of the Entity** that published the Job Offer.
- Your **identification details**: last name, first name, email.
- **Title of the relevant Job Offer**, where applicable.
- **Reference of the Job Offer**, where applicable.

The Entity must respond to the User within 30 days from receipt of the request. This period may be extended by two months due to the complexity of the request or the number of requests the Entity has received from the User. In such case, the Entity will inform the User of the reasons for this extension within one month.

The User is informed that, where there is serious doubt as to their identity, the Entity may request additional information to confirm their identity.

Should any difficulty arise with regard to the management of their data and/or the rights request submitted, the User may contact the SUEZ Data Protection Officer (DPO) at: privacy@suez.com.

If the User considers the response unsatisfactory, including after contacting the DPO, they may lodge a complaint with the competent supervisory authority: in France, the CNIL, at 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07 or, as applicable, the local supervisory authority in the country of the Entity concerned.

¹ For example, 12 months for Belgium and the Netherlands and 6 months for Germany.

² Or the time period applicable according to country, as specified above, where applicable.

³ Or the time period applicable according to country, as specified above, where applicable.