

# ChooseMyCompany - Data privacy policy

## INTRODUCTION

As part of its activity, ChooseMyCompany records and stores data from platform users.

Personal data must be processed lawfully, fairly and transparently.

The purpose of this document is to provide clear, accessible information on how we (ChooseMyCompany) use the information we collect or that you send to us. This privacy policy sets out the principles by which we process such information and also tells you how to access and update it and make certain choices about how your personal data is used.

## INFORMATION COLLECTED AND USE

By using our website, you transmit certain information to us about yourself, some of which is able to identify you ("Personal Data"). This is particularly the case when you browse our website, when you fill in the contact forms or connect to our backoffice. In each case, we limit the collection of personal data to what is strictly necessary and indicate the purposes of such data collection as well as the recipients of this data.

### **Visiting choosemycompany.com:**

When browsing the choosemycompany.com website, we may collect the following information:

- Information about your browsing. By using our website, you interact with it. We collect certain information about your activity, such as the pages you visit, as well as the various actions you perform on these pages (opening popups, filling informs).

- Information about your device. By using our website from a device, we collect data on that device (is it a computer, tablet, smartphone, screen size, operating system used, device location, default language).

⇒ This aggregated data is used for statistical traffic analysis purposes.

### **Contact form:**

When you submit a form to contact us, the following information will be sent with your request:

Information explicitly filled in by the user in the form (surname, first name, contact details...)

⇒ This data is used to respond precisely to the person making the request. When the user gives their explicit consent, this can be added to our mailing list. When the request concerns our offer, the user may be added to our CRM database.

### **Taking part in a survey:**

When you take part in a survey by submitting your questionnaire, the following information is collected:

- All answers explicitly given in the questionnaire.
- When the participant has used a unique individual link or “identification token” (necessary for a secure survey), the unique identifier of the guest, as well as any pre-qualifications associated with this guest.

⇒ This data is used to complete the survey service which has been requested of us by our clients (we are then a subcontractor). The responses are never linked to the guest that was used to solicit the participant (the unique identifier collected only serves to mark the guest as having responded). This anonymous data will be presented in aggregate form to the client for analytical purposes, always respecting a minimum threshold of respondents to avoid overly precise population breakdowns.

### **Using your “Pro” account:**

If you are a ChooseMyCompany customer, you can connect to your customer Backoffice on [choosemycompany.com](https://choosemycompany.com). When you connect or attempt to connect, the

following information is recorded:

- Identifier of the target user
- IP address / date and time
- Connection attempt outcome (success or reason for failure)

⇒ This data is used for traceability purposes.

## **SHARING OF PERSONAL DATA**

ChooseMyCompany never shares your personal data with other companies for commercial prospecting purposes.

We may share your personal data with the following recipients, either because you have authorised us to do so, or because it is necessary for the performance of our contract with you:

- Our service providers. We use various service providers, for example to operate our online forms or manage our CRM.

Our service providers must comply with our privacy and data security requirements. They are not allowed to use the personal data they receive from us for any other purpose.

- With banks or payment management institutions, which provide accounting and financial services.
- Legal authorities. To comply with our legal obligations, we may be required to share some of your data with the legal or regulatory authorities.

ChooseMyCompany's servers are located in France and ChooseMyCompany strives to keep the personal data of its customers within the European Union. However, it is possible that the data we collect when you use our website or as part of our services is transferred to other countries, for example if some of our service providers are located outside the European Union.

In the event of such a transfer, we guarantee that the transfer is carried out:

Either to countries providing an adequate level of protection, i.e. a level of protection equivalent to what the European regulations require;

Or it is covered by standard contractual clauses adopted by the European Commission;

Or in the United States to companies that have joined the EU-US Privacy Shield and registered as such with the US administration.

## **DATA RETENTION AND PROTECTION**

Data protection is a major issue for ChooseMyCompany. This protection depends on the quality and control of organisational measures (policies, definition of roles, periodic reviews etc.) and technical measures (backup, firewall, encryption, etc.).

To have our security requirements recognised, we have started a certification process for our ISMS (Information Security Management System): ISO 27001.

### **Retention period:**

Personal data is kept for the time necessary to fulfil the purpose for which it was collected or in accordance with legal requirements.

The retention period varies according to several factors, including:

- The needs of ChooseMyCompany's activities;
- Contractual requirements;
- Legal obligations (Insurance, Taxation, Human Resources, etc.);
- The recommendations of the supervisory authorities.

# YOUR RIGHTS

You have the following rights regarding your Personal Data

## **Right of access and communication of data**

You have the right to access the Personal Data that concerns you. However, due to ChooseMyCompany's obligation of security and confidentiality in the processing of personal data, you are informed that your request will be processed provided that you provide proof of your identity, in particular by producing a scan of your valid identity document (if requested by email) or a signed photocopy of your valid identity document (if requested in writing).

ChooseMyCompany informs you that it will be entitled, if necessary, to oppose manifestly abusive requests (by their number, their repetitive or systematic nature). To help you in your approach, in particular if you wish to exercise your right of access by means of a written request to the postal address mentioned above, you will find by clicking on the following link a model letter drawn up by the National Commission for Computing and Liberties (the "CNIL").

## **Right to rectify data**

Under this right, the legislation entitles you to request the rectification, updating, blocking or deletion of data concerning you which may prove to be inaccurate, erroneous, incomplete or obsolete. You can also define general and specific directives relating to the fate of personal data after your death. If necessary, the heirs of a deceased person may demand that the death of their loved one be taken into consideration and/or that the necessary updates be made. To help you in your approach, in particular if you wish to exercise, on your own account or on behalf of one of your deceased relatives, your right of rectification by means of a written request to the postal address mentioned above, you will find by clicking on the following link a model letter produced by the CNIL.

## **Right of opposition**

The exercise of this right is only possible in one of the following two situations:

1. When the exercise of this right is based on legitimate reasons; or

2. When the exercise of this right aims to prevent the data

collected being used for commercial prospecting purposes. To help you in your approach, in particular if you wish to exercise your right of opposition by means of a written request addressed to the postal address indicated above, you will find by clicking on the following link a model letter produced by the CNIL.

## **Exercising your rights**

By mail addressed to our DPO at the following address: ChooseMyCompany

For the attention of the DPO

56 rue des Batignolles,

75017 Paris

By email addressed to our DPO at the email address [dpo@choosemycompany.com](mailto:dpo@choosemycompany.com)