



PRIVACY STATEMENT - APPLICANTS

1. INTRODUCTION

In accordance with the general data protection regulation (« **GDPR** »), this privacy statement is intended to provide certain information regarding the way we process your personal data when assessing your job application.

2. DATA CONTROLLER

The controller of your personal data (i.e., the entity which determines why and how your personal data is processed as part of the application process) is the Spadel group company for which you applied (“We” or “Spadel”). A complete list of the Spadel companies can be found at the end of this privacy statement, together with their address.

3. PURPOSES OF PROCESSING AND DATA PROCESSED

We only process your personal data as part of our assessment of your job application (and related purposes) and will not use them for other purposes.

Purpose	Legal basis
Assessment of your job application	Precontractual steps taken at your request
Compliance with our statutory obligations as part of the application process	Statutory obligations
Verification of information provided with your application	Spadel’s legitimate interest to verify applicants’ qualities and qualifications
Internal reporting and implementation of consistent recruitment policies at group level	Spadel’s legitimate interest to ensure for qualitative reporting and implement consistent recruitment policies at group level

Purpose	Legal basis
Exceptionally, management of potential disputes that may arise from your application	Statutory obligations and defence during legal proceedings

We typically process the following personal data about you:

- Contact details;
- Family situation;
- Information regarding your salary and benefits and other details in relation your current professional situation;
- Information regarding your education, qualifications and professional experience;
- All other information included in documents you provided, including electronic communications.

We do not use profiling or automated-decision processes. The data we process about you is, in most cases, obtained from you. In certain circumstances, we may verify certain information or data (e.g., data regarding your education or your professional experience) with third parties (education institutions or past employers).

4. RETENTION OF YOUR PERSONAL DATA

Generally speaking, your personal data will be kept as long as necessary for the fulfilment of the purposes described above.

In most cases, this will result in us keeping your personal data for the period necessary to the recruitment process. If, further to this process, we conclude an employment contract or any other collaboration agreement, your data will in that case be processed in order to perform that contract or agreement (we will in that case separately inform you of the modalities of the processing of your data and their period of retention).

If you are not selected further to your application, your personal data will in principle be kept for 5 years (save for Devin EAD where your personal data will be kept 6 months), so as to be able to recontact you in case of vacancy or to be able to provide a response in case of dispute regarding the reasons why you were not selected.

5. SHARING YOUR PERSONAL DATA

In order to ensure better quality and efficiency in the processing of applicants’ personal data, we may enter into agreements with third parties under which they will process your data on our behalf and solely under our instructions. This may typically include data hosting service providers or recruitment professionals. In case personal data are transmitted to such service providers, these will be bound by specific agreements and obliged to process your data in a secure way.

Likewise, disputes or other incidents may lead us to exceptionally share your personal data to law enforcement authorities.

In the context of internal reporting within the Spadel group, in order to implement consistent recruitment policies at group level and centralize, to the extent possible, recruitment management, your personal data

may also be shared with other group companies established in Belgium, the Netherlands, France and/or Bulgaria.

6. CROSS-BORDER TRANSFER OF YOUR PERSONAL DATA

The processing and transmission of your personal data (within Spadel or via third parties) may imply a transfer of your personal data via various networks, including in other countries. However, your personal data will not be transferred to recipients outside the European Economic Area (EEA), in countries which do not offer a level of protection comparable to that offered by European Union law.

7. YOUR RIGHTS

You are entitled to request access to your personal data and their correction in case of inaccuracies. You are also entitled to request the deletion of your personal data when no longer relevant. Although you may request the deletion of your personal data at any time, we may be obliged to keep some of your data in certain circumstances.

In addition, you have the right to object to the processing of your personal data for reasons related to your personal situation and to request the limitation of the processing of your data in specific circumstances.

Finally, please note that you are entitled to receive the personal data you provided, in a structured, commonly used, machine-readable format (data portability).

8. CONTACT DETAILS

If you have any questions or comments regarding this privacy statement, or questions regarding the processing of your personal data as described above, or if you wish to exercise any of the rights described above, please contact us through emailing us at privacy@spadel.com as single contact point.

9. DATA PROTECTION AUTHORITIES

Finally, please note that you are entitled to lodge a complaint regarding the processing of your personal data at the competent authority of the country where the Spadel group company for which you applied is located. Their contact details are:

Country	Address
Belgium	Autorité de protection des données/Gegevensbeschermingsautoriteit Rue de la Presse 35 1000 Brussels Belgium
France	Commission Nationale de l'Informatique et des Libertés 3 Place de Fontenoy - TSA 80715 75334 Paris CEDEX 07 France
The Netherlands	Autoriteit Persoonsgegevens Postbus 93374 2509 AJ Den Haag The Netherlands

Bulgaria	Commission for the protection of personal data Boulevard Prof. Tsvetan Lazarov 2 Sofia 1592 Bulgaria
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10. LIST OF SPADEL GROUP COMPANIES

Company	Address
Spadel SA	Avenue des Communautés 110 – 1200 Brussels - Belgium
Spa Monopole SA	Rue Auguste Laporte 34 - 4900 Spa - Belgium
Bru-Chevron SA	Les Bruyères 151 – 4987 Stoumont - Belgique
Spadel Nederland B.V.	Brieltjenspolder 28 D - 4921 PJ Made – The Netherlands
SA Eaux Minérales de Ribeaupillé	48, route de Bergheim - 68150 Ribeaupillé - France
Les Grandes Sources de Wattwiller S.A.S.	2 rue de Guebwiller - 68700 Wattwiller - France
Devin EAD	Devin Municipality, 6 Vasil Levski Street, Devin 4800 - Bulgaria