

# Privacy Policy

Our company is highly concerned with the protection and the confidentiality of personal data and is committed to ensuring the highest level of protection of your personal data in accordance with the applicable regulations on the protection of personal data, applicable in Europe and in France (GDPR).

This privacy policy aims to inform you about the practical measures and commitments made by our company to ensure the respect and protection of your personal data when submitting an application on our online application site.

It applies to all visitors to our Sites and users of our Services ("Users").

The terms "We" and "Us" refer to the Data Controller, as defined in section 1 below, and the Services we provide.

The terms "You" and "your" refer to all Users of our Services or visitors to our Sites or Applications.

The term "Customer" defines our customers.

The word Personal Data (PD) covers all personal information that allows a third party to partially or wholly identify You, and that is collected and processed par our Company.

## 1 - Identity of the data controller

Since May 25<sup>th</sup> 2018, in application of the European regulation 2016/679 of April 27<sup>th</sup> 2016, more generally known as "General Data Protection Regulation" (GDPR), Nacel Ltd, whose head office is based at 9 rue des 2 Avenues - 75013 Paris, duly registered with the Paris Trade and Company Register under number 724 800 511, (hereinafter "The Company") is a Data Controller (DC) as defined by the GDPR

Our Data Protection Officer (DPO) is Mr. Tom BROWNE.

He can be contacted by email at the address [dpo@clc.fr](mailto:dpo@clc.fr) or by post at the following address :

DPO Nacel, Rue de la Comtesse Cécile, 12000 RODEZ.

## 2 – Lawful purposes for data processing.

The collection and processing of your Personal Data (PD) as implemented by the Company is justified by explicit, legitimate (lawful) and determined purposes. Processing includes :

## **Online application**

Our online application services allow you to open a personalized account on our site, and to provide certain documents to enable us to examine your capacity to apply for one of the jobs that are offered by The Company.

## **Job interviews**

Your personal data is necessary to allow us to verify your capacity or not to access a job within our Company. Your data will, specifically, be used for individualized interviews, necessary to ensure the compatibility of your application with our needs and legal obligations.

## **Processing of the documents necessary for your employment**

Our internet Services enables You to transmit to Us, all required documents necessary for the accomplishment of the legal formalities generated by the existence of a contractual working relationship.

This data will also be used for the computerized management of payroll within the Company (wage slips, social welfare and tax returns, relations with health insurances, banking data necessary for the payment of your wages).

## **Use of your personal data to inform you on employment opportunities**

You can ask us to include your name in our lists used to inform and publish, in a personalized or impersonalized way, our job offers. Should you wish to benefit from this service, your data will be used to contact you.

## **Compliance with the Data Controller's legal obligations**

As our company is subject to French legal and regulatory provisions, governing both our business and our status as a commercial company, your information will be collected, stored and disclosed in certain cases to enable the company to meet these obligations.

## **Protection of the vital interests of a data subject or another individual.**

Some personal information, including "sensitive information" is processed to ensure your safety in the course of your work within our structure, especially during the course of stays.

## **3 - Data collected and processed**

Our company makes sure to only process personal data that is strictly necessary for the purposes detailed above.

The data we process is first and foremost the data You provide to Us through our registration forms. We also process data that you upload ("Uploads") to our Sites and Applications. These data are usually included in your CV or in messages (message accompanying a request, motivation of an application, request for additional information, etc.). These Uploads may include a photo or information about your specific working conditions.

Information that may appear on your C.V.

- Information about your status (Name of birth, Name of use, Given name (s), date and place of birth, Nationality, Mailing address, marital status)
- The information necessary to contact you (email address, phone number)
- Information about your professional experiences and your skills and diplomas

Information necessary the application:

- Indications as to your level in languages,
- Details about your experience,
- Your skills of animation and accompaniment of stays,
- Information about your interests.

Sensitive information:

- Some information about your general state of health or your food or other allergies,
- Some information about your diet (possibly having a religious connotation),
- Your social security number,
- The number of your identity document (passport or identity card).
- Information about your judicial background.

The mandatory nature of the data collected is indicated to you by a message sent by Us. Entering certain data is mandatory only when it is necessary for us to process your request.

This information may be collected at different stages of our relation (application, employment, etc). As the employment process progresses, supplementary information will be required.

#### A. Application stage

We will require :

- a letter of motivation,
- a CV with your personnel and professional background
- a letter of reference,
- your BAFA or BAFD diploma and the online application form (the extend of required information depends on the position you are applying for).

Regarding the application form, we ask you to provide certain information and sensitive data, including your Social Security number, and your passport number or identity card. This information, although stored by computer, is not readable by our recruitment department at this stage. It just allows us to know if you have a passport, and a French social security number. Regarding information about your judicial background, this information is purely optional at the application stage.

The mandatory documents will be studied by our recruitment department. By indicating your telephone number and your email address on the application form, you authorize us to contact you either by telephone or by email, for the purpose of:

- Organising a job interview with you,
- Or inform you that your application has not been selected by our services.

If your application does not meet our hiring criteria, you will be informed by e-mail. We inform you that your data will be automatically deleted in our computer databases. In any case, we undertake never to use this data or to communicate it to third parties without your express agreement.

#### B. "Retained candidature" stage

If your application is validated, our recruitment department will contact you to arrange an interview. During this interview, other information will be requested or communicated by You. We remind you that you are free to refuse to answer any or all our questions, however these questions are all necessary to determine if your profile corresponds to the jobs we are likely to offer you. We inform you that a written report of this interview will be recorded by our services. This document is covered with same rights and protections as computerized processing of your data, in accordance with the provisions of the GDPR.

We inform you that information or documents that are optional at the time of application may become mandatory once Company issues a job offer or proposal. The mandatory nature of these documents stems from our legal obligations as a tour operator.

#### C. Successful Job Applications

If your application is retained and you have successfully completed our job interview, your personal data becomes data described as "data on a successful candidate". From then on, three possibilities exist:

- Either your availability dates correspond to our needs, in which case we offer one or more job proposals within our entity.
- Or your availability dates do not correspond to our needs, but you agree that we keep your data (by ticking the box "I authorize the Company to keep my personal data to inform me of available positions")
- Or your availability dates do not correspond to our needs and you do not wish us to keep your data (by **not** ticking the box "I authorize the Company to keep my data in order to inform me of available positions", in which case your data is automatically deleted from our databases.

In any case, we do not communicate your data to third parties unless otherwise agreed by you.

We inform you that you can ask us to be contacted by e-mail (personalized or not) detailing the employment opportunities within our Company. We also inform you that you may agree to receive employment communications from other Go & Live Group companies, if you wish.

#### D. Employment

In the event that your application has been selected, that you have successfully completed the interview, and that your availability dates correspond to our needs, our recruitment department will offer you one or more employment opportunities within The Company.

You have two possibilities:

- Either you accept one or more employments (your status changes to "Hired")
- Or you refuse all our offers. In this case, it is your responsibility to inform us, by email, how you wish us to deal with your personal data concerning you in our possession. In any case, in the absence of hiring during a season, your data is automatically deleted and without notice to you, once a year, on November 1st.

If you accept an offer from our Company, we inform you that we will be required to:

- Ask you for additional documents and supporting documents. These documents will be intended to verify that you can legally accept the position, and will be necessary to enable us to fulfil our legal obligations. Some of these documents will be passed on to third parties under the regulations applicable to stays or hiring in general. All recipients are subject to professional secrecy obligations (public bodies in particular). Information about your criminal record may also be required, again to allow our company to meet its legal obligations in the context of stays with minor children.
- To send you a contract of employment
- Communicate some of your data, sometimes sensitive, to our internal computerized payroll management services, in order to allow our company to undertake the steps and formalities of hiring, register with social welfare organisations, establish your pay slip and proceed with payment of your salary. The conditions of use of this data, and your rights are detailed in your employment contract.
- For some positions, our services may ask you for some very personal or sensitive information, such as questions about health, or your eating habits. If we request this information, obtaining it is necessary for the smooth running of your stay or the execution of your contract. You have the right to refuse to communicate them to us. In this case, we consider that you withdraw your application. If you agree to share them with us, we consider that:
  - o The information provided is fair clear and loyal (implying that we will never be liable for misrepresentation, misrepresentation, or incomplete declaration)
  - o You authorize us to process this information.

#### **Third-party data**

We inform you that in some cases, We are likely to receive personal data about You, particularly when your application has been retained by our recruitment services

This information may come mainly from public authorities (agreements or prohibitions to work with children, social security information, tax information, information from health insurance funds, information about your status as a foreign worker).

## **4 - Recipients of the collected data**

Your personal data are only used by persons identified and authorized for the purposes described in this policy of protection of personal data. The vast majority of them are salaried employees of our company, subject to the strictest obligations of confidentiality and professional secrecy.

Most of the information we collect is stored by specialized data storage companies, all based in France and fully compliant with GPRD provisions. This helps to protect information stored, and to encrypt it in much higher security conditions than a single company is likely to organize. The compliance of these entities with the legal requirements, mandatory for data centers in France, has been verified and recorded contractually.

We undertake never to transmit your personal data to third parties for reasons unrelated to these purposes.

Thus, your data is transmitted only to the categories of people listed below:

- Recruitment service (only salaried staff of our company)
- Administrative, legal and financial management (only salaried employees of our Group)
- Employees of the Company when this communication is necessary for the execution of your employment contract
- State services (when the regulatory or legal provisions applicable to our activity require it)
- Our clients (when required by law, and within the limits of these obligations)
- Some of our subcontractors when this communication is necessary for the smooth running of your job (see below).

### **With regard to our subcontractors - Warning**

**We draw your attention to the fact that we will sometimes have to communicate some of this data to our subcontractors, in order to allow you to perform your duties. It may be, for example, to transport companies, accommodation providers, etc ....**

**Where possible, we verify that our contractors are GPDR compliant which is the case when the subcontractor is established in the EU**

**We also inform you that this data may, when necessary for the job to which you will be assigned, be communicated to persons or organizations that are established in countries outside the EU (for example the US, Australia, Canada, etc.). Some of these countries are considered to be countries that do not comply with the GPRD provisions by the CNIL. As such, we inform you that we always ask these third parties to take any measure to ensure the security of your data, but we cannot guarantee it. By accepting this Privacy Policy, you authorize us, as part of your employment contract, to make such communication, accepting knowingly the risks.**

**We also inform you that some sensitive information (including medical, dietary or other) may be requested by some of our subcontractors. These requests are related to your personal protection and security. This information is therefore mandatory. Again, you may refuse to disclose this information before you are hired, although it is stated that in**

**certain cases, this position may imply that your application may no longer be accepted for our stays.**

## **5 - Communication**

Depending on the Services used or your preferences, we will contact you by email, by publications on our Sites or Applications, by telephone, by Skype or by any other means of communication that you have detailed to us.

## **6 - Security of the data collected**

All data collected is processed with appropriate security, guaranteed by a logical and material security policy and security measures specifically tailored to our business. Various audits are conducted within our infrastructures on regular basis to verify this.

Our company's technical teams are aware of the GDPR and our Applications have been designed or organised accordingly.

Thus, the following principles govern the development of sites and applications, both at the technical infrastructure level (secure redundant hosting, security and access control policy), and from the application point of view (development of sites and applications):

- Secure data collection
- Storage guaranteeing data integrity and confidentiality
- Securing development environments
- Securing access to data
- Regular trainings of our technical teams
- Voluntary limitation of subcontracting (infrastructures, services and development) and intervention on anonymized test datasets
- Where possible, anonymization of the data transmitted to our subcontractors when the transmitted information is sensitive
- Contracting, with our service providers, of reciprocal obligations of security and respect of the personal data

We process personal data within secure infrastructures located in France.

## **7 - Data retention**

Your data is kept:

- Until December 31 of the fifth year following the end of your last employment contract in case of employment
- Until November 30th of the current calendar year when your application has been qualified as a "Hold / Waiting List", unless otherwise requested (in which case the retention period is either the date you set, or the December 31st of the fifth year following that of your application)
- Immediate cancellation in case of refusal of application unless you request otherwise

After data retention deadlines, data is then anonymised and can be used for statistical purposes.

The deletion of computerized data is automated within these deadlines. The destruction of non-computerized documents is carried out by the recruitment department with adapted equipment.

## **8 - Your rights**

Under GPDR regulation, you have a right to access, rectify, and ask for deletion (except in the case where a lawful purpose allows us to refuse deletion), opposition and a right of portability of your personal information.

You also have a right to limit our processing of your personal data. If you have consented to the processing of personal data, you may withdraw your consent at any time, except when the exercise of this right is contrary to your obligations under an employment contract or a legal or regulatory provision that is mandatory for us.

You can apply, for further information, or to exercise these rights, to the Data Protection Officer by post or e-mail, accompanied with a copy of an identity document at the following addresses

- by mail: dpo@clc.fr
- by mail: Delegate for Data Protection, Nacel, Rue de la Comtesse Cécile, 12 000 RODEZ.

You also have the right to set guidelines regarding the fate of your personal data in the event of death.

You have the right to appeal to the National Commission for Informatics and Liberties (CNIL).