

PRIVACY POLICY FOR JOB APPLICANTS AND REFERRAL CANDIDATES

By using the Site, you consent to this online Privacy Policy.

The data controller is Société BIC, having its registered office 14 rue Jeanne d'Asnières – 92611 Clichy Cedex - France.

1. PRIVACY STATEMENT

BIC Group (meaning Société BIC and its affiliated companies and subsidiaries, including BIC Corporation, and referred to herein as "BIC" or "We") is committed to protecting your online privacy when referred for a position or applying for employment at BIC online (the "Site"). The purpose of this privacy policy ("Privacy Policy") is to inform you about the types of information we gather about you when you are either referred for a position or apply for employment with BIC, how we use that information, whether we disclose it to anyone, and the choices you have regarding our use of the information.

With the exception of Site usage information and cookies, no personal information is automatically collected from visitors to the Site. Any other personal information you may provide will be on a voluntary basis.

You may at any time withdraw or change your consent to our use or disclosure of your personal information, or request that we delete it from BIC's files, subject to legal and contractual restrictions. However, if you do not provide personal information required for us to supply you with a service offered on the Site, we may not be able to provide that service to you.

REFERRAL CANDIDATES: If you received an email from BIC indicating that you were referred for a position, the referrer provided BIC with a recommendation for your consideration as a candidate and indicated his or her relationship to you. The referrer also confirmed that he or she was authorized by you to provide BIC with your first name, last name, email address and possibly your resume. If you do not wish to apply for the position and would like your information removed, please follow the link provided in the email or contact our Data Protection Officer, as indicated in Section 11 below.

2. CATEGORIES OF PERSONAL INFORMATION WHICH WE MAY COLLECT AND HOW WE USE IT; THIRD PARTY PLATFORMS

When visiting the Site, we may collect data from you, including your use of the Site, and the computer used by you to access the Site.

Personal Information is any information that identifies you as an individual. It includes information that you provide directly to us, that we collect from other sources within BIC (e.g., HR departments or career management) or from third parties outside the BIC Group (e.g., security systems, recruitment services, etc.) In the context of considering you for employment, we may collect the following types of Personal Information:

Identification data: name, address, gender, nationality, contact details (address, personal phone number, email address, copies of identification documents such as social security cards, passports, driver's license.

Transport/Business travel: Copy of passport, driver's license and driving records.

Education and career: qualifications and diplomas, foreign languages spoken, curriculum vitae (detailing your prior work experience and where applicable, continuing education), personality, deductive reasoning and numerical assessment results.

Work life: date, division, department, job title, information about the job, contact phone number and email address, job description, working hours.

Any other data that you have communicated to us when you applied for a job at BIC (e.g., CV or cover letter, assessment report from external recruitment agencies and former managers) and all data that must be collected to meet any obligations under local law or in the context of legal claims.

We may also use your personal information for other purposes which are disclosed to you and to which you consent, or for such other purposes as permitted or required by applicable law.

Purposes for collecting personal information

HR Management:

- For evaluating a candidate's fitness for a position
- Managing candidate records

Career Management:

- Record of education and work experience

General Human Resources Management:

- For new job updates communications (when you provide us your consent to participate in email communications)

To Ensure the Security of BIC:

- Managing access to premises (badge control)
- Securing premises by CCTV

In the Context of a Judicial Enquiry or Proceedings:

- On request from authorities
- Making submissions in a case or before judicial or administrative authorities, an arbitration tribunal or a mediator

How we use your Personal Information

We collect and use your personal information as necessary in order to

- (1) fulfill our obligations and exercise our rights in connection with your potential employment;
- (2) as needed to fulfill our statutory and regulatory obligations,
- (3) when necessary to establish, exercise or defend our rights within the framework of judicial proceedings; and (4) for other legitimate purposes including to enable us to effectively and efficiently run and manage our operational activities, to maintain compliance with internal policies and procedures;

Who may your Personal Information be shared with?

Internal data recipients:

- HR departments
- Recruitment Hiring Team Members
- Site security service
- BIC departments concerned by data processing

Data access by external service providers

- IT tools used by the company and containing personal data
- Service providers working on these tools
- Site security service providers

All service providers are prohibited from using your personal information except to provide these services to BIC and they are required to maintain the confidentiality of your information.

3. YOUR PRIVACY RIGHTS

Under certain circumstances, you have rights under pertinent data protection laws in relation to your personal data. BIC is committed to respect your rights and will act promptly and in accordance with any applicable law, rule or regulation relating to the processing of your personal data.

This section describes your privacy rights and explains how to exercise those rights.

Right to be informed: you have the right to be informed about how your personal data is used and shared. BIC will provide you this explanation in a concise, transparent, intelligible, and easily accessible format and will use clear language.

Right to access: you have the right to obtain confirmation of whether BIC is processing your personal data, access to your personal data and know how your personal data is being used by us.

Right to have data rectified: you have the right to have any inaccurate or incomplete personal data rectified. If BIC has disclosed the relevant personal data to any third parties, we will take reasonable steps to inform those third parties of the rectification where possible.

Right to have personal data erased: you have the right, in certain circumstances, to request that personal data held by BIC is erased. This is also known as the right to be forgotten. This is not an unconditional right to have all personal data deleted. BIC will consider each request in accordance with the requirements of any laws relating to the processing of your personal data.

Right to restrict processing of personal data: you have the right to avoid the processing of your personal data in certain circumstances. This right arises if you are disputing the accuracy of data, if you have raised an objection to processing, if processing of personal data is unlawful and you oppose erasure and request restriction instead or if the personal data is no longer required by BIC but you require the personal data to be retained to establish, exercise or defend a legal claim.

Right to data portability: in certain circumstances you can request to receive a copy of your personal data in a commonly used electronic format. This right only applies to personal data that you have provided to BIC and if the processing is based on your consent or if the personal data must be processed for the performance of a contract and the processing is carried out by electronically.

Right to object: in certain circumstances, you have the right to object to processing being carried out by BIC if (i) data is processed based on legitimate interests or for the performance of a task in the public interest (including profiling), (i) data is used for direct marketing purposes, or (i) if data is processed for scientific or historical research or statistical purposes. You will be informed that you have a right to object at the point of data collection and the right to object will be explicitly highlighted and be presented clearly and separately from any other information.

Right not to be subject to automated decisions: where the automated decision produces a legal effect or a similar effect, you have the right not to be subject to a decision which is based on automated processing only.

4. LINKS TO OR FROM OTHER WEBSITES

The Site may integrate third party platforms, such as Facebook and Twitter “like” and “share” function. We can collect technical information using cookies and other technologies on our own behalf and through the use of third-party platforms, such as those named in this paragraph. Technical information may include your IP address, browsing path, operating system, and other information. When you interact with the third-party platforms, such as using the Facebook “like” or “share” feature, that platform may record your interaction with the Site. The third-party platforms have their own privacy policies, which govern the use of any personal or non-personal information they collect.

5. HOW OUR SITE USES COOKIES

Like many other commercial sites, our Site may utilize a standard technology called a "cookie" to collect information about how our Site is used. Please see our Cookie Policy for details.

6. DO NOT TRACK

We do not track your activity on any other website, but ours. We do not use information obtained from this Site to participate in activities commonly known as behavioral advertising and we, by default, do not track your activity on any other site. Some browsers have a "do not track" feature that lets you tell websites that you do not want to have your online activities tracked. These features are not yet uniform, and our website is able to respond to some, but not all of those signals.

7. DISCLOSURE TO THIRD PARTIES

Except as specified herein or permitted or required by applicable law, we do not share personal information about you with any third party without your permission and we do not allow third parties to collect personally identifiable information from users on this Site. This does not include trusted third parties who assist us in operating the Site, conducting our business or serving you, so long as those parties agree to keep this information secure and confidential. Third party providers maintain the information they need to perform their designated functions and we do not authorize such parties to use or disclose personal information for their own marketing or other purposes.

We may release your personal information when release is permitted by or appropriate to comply with the law (for example, in response to a legally valid inquiry or order or otherwise required or permitted by applicable law), to enforce our Site policies, to exercise or defend legal claims or to protect ours or others rights, property, or safety.

Please note that your personal information may be maintained and processed by service providers located in foreign jurisdictions, whose data protection laws may differ from the jurisdiction in which you live.

8. SECURITY OF YOUR PERSONAL INFORMATION

We have policies and procedures in place to protect your personal information from loss, unauthorized access, modification or disclosure. In addition, we have implemented technological safeguards including security software, passwords and firewalls intended to prevent unauthorized computer access. No claim is made as to the impenetrability of the system under unusual circumstance or its resilience to future attacks.

9. TRANSFER AND STORAGE OF INFORMATION

Your personal information is stored at secure locations and on servers located in Germany. We or our service providers may use servers located in the United States for back up and emergency storage of this Site. Any electronic records generated by us or our service providers during the course of your interactions with the Site may be maintained on those servers. As such, your personal information may be disclosed, processed and stored outside your country of residence, and therefore may be available to government authorities under lawful orders and laws applicable where the information is stored. You may address questions about the privacy policies and practices relating to handling of your personal information by contacting us by the method set out below. We retain your personal information as long as is required for the purposes identified when you provided the personal information and for any new purposes identified and consented to by you, and for an appropriate time thereafter.

10. CHILDREN'S ONLINE PRIVACY

The Site is designed and intended for adults. In accordance with the Children's Online Privacy Protection Act (COPPA), we do not knowingly collect or store any personal information from or about children under age 13, and the Site is not designed to collect personal information from children under age 13.

11. CONTACTING US REGARDING THIS PRIVACY POLICY OR YOUR PERSONAL INFORMATION

Questions regarding this Privacy Policy, the collection or the accuracy of your personal data, the use or disclosing of the information, or requests to correct, amend and request deletion of your personal data may be directed to our Data Protection Officer: data-protection@bicworld.com.

You may also have a right to lodge a complaint with your local data protection authority however we recommend you contact us before doing so as we may be able to resolve any issues with you directly in a more efficient manner.

12. MODIFICATIONS

This Privacy Policy is subject to change at our discretion. You should periodically check this Site for changes to this Privacy Policy. All changes will be posted as soon as they go into effect. Your continued access to and/or use of the Site after any such changes constitutes your acceptance of, and agreement to, this Privacy Policy, as revised.

September 2020