

PERSONAL DATA POLICY

MOBYCLIC: THE GROUP'S INTERNAL JOB MOBILITY SITE

21/12/2020

Dear colleagues and applicants,

We are pleased to present our personal data policy regarding the data that we process due to your use of our site Moby clic and through the applications that you submit via this tool.

The policy is presented in question and answer form.

It sets out concisely your personal data in our possession and how we use it.

It also summarises your specific rights as regards personal data and explains how you can exercise them.

YOUR QUESTIONS – YOUR RIGHTS

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1. Who is responsible for processing my personal data?

- **Technical administration of Mobyctic:**

Mobyctic was created and is administered by:

Bouygues

32 avenue Hoche

75008 Paris, France

A *Société Anonyme* (public limited company) with a share capital of € 382,504,795

Registration No. 572 015 246 (Paris)

Email: rgpd@bouygues.com

- **Processing of applications:**

Applications submitted via Mobyctic are sent to the people in charge of recruitment as identified in the job advert. They are processed by the relevant Bouygues group entity, and by this entity alone.

2. Why do you need this personal data?

We use your personal data:

- To allow you to apply for job offers that interest you, as advertised by Bouygues group entities;
- To identify you (create a user account) and to manage your Mobyctic user account;
- To allow you to use the services available through the platform, i.e. to create custom email alerts based on your career and mobility preferences.

3. What is the legal basis for using my personal data?

We use your personal data on the basis of pre-contractual measures. As such, we use the personal data you send us via the platform based on your acceptance of this personal data policy.

4. How did you obtain my personal data?

We obtain personal data about you from the following sources:

- Data you sent us for the creation or modification of your user account (e-mail address, uploaded CVs, etc.)
- Data contained in your application documents (CVs, cover letter, etc.);
- Technical data related to your use of the Mobyctic service (cookies, etc.)

5. What types of personal data about me do you collect?

We process the following types of personal data:

- E-mail address;
- Name of company for which you work;
- Data contained in your CVs and/or the attachments to your applications;
- Cookies (session-based authentication cookies, audience measurement cookies, social media cookies generated by share buttons).

6. Do you use a service provider (sub-contractor) to process my data?

Yes: Talentsoft, the developer, may access your personal data in order to carry out maintenance on the platform.

7. Do you give my personal data to anyone else?

Yes, your job applications are sent automatically to the people in charge of recruitment identified in the offer. Your job applications are processed by the Bouygues group entity concerned, and solely by this entity.

We only provide the data strictly required by those persons for the stated purpose.

NB: We will never sell your personal data.

8. Do you hold any sensitive data¹ about me?

In principle: No, we do not collect sensitive personal data about you.

Exceptionally: The people in charge of recruitment at the entities to which you have applied may process sensitive data about you if you have voluntarily included such information in your applications.

9. Do you transfer my personal data outside the European Union?²

In principle: We do not transfer your personal data outside the European Union.

Exceptionally: However, we may be obliged to transfer your personal data outside the European Union in certain very specific cases, such as if you apply for a job that is located outside the European Union. If so, your job application will be sent to the person in charge of recruitment and future

¹ **Sensitive** or **specific** data is defined as:

- Personal data about one's racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, membership of a trade union, genetic data, biometric data for unique identification of a person, physical or mental health or condition, sexual life or orientation; and
- Details about criminal offences and court sentences.

² At 07.03.2018, the countries of **the European Union** were the following: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the United Kingdom.

manager present in the location of the job vacancy. This person in charge of recruitment is not necessarily located in a country of the European Union or in a country considered to be adequate by the European Union in terms of personal data security. All data transfers of this type potentially carry a higher level of risk for your rights and freedoms as well as for the safety of your data³.

10. Where is my personal data stored?

Your personal data is stored within the European Union (France).

11. How long do you keep my personal data?

We keep your personal data for the following period(s):

- a) Data related to your user account:
We retain your data until you ask us to delete your account. Inactive accounts are deleted after 12 months.
- b) CVs and cover letters saved in your account:
We retain your data until you delete it via your account, or until your account is deleted.
- c) Applications submitted via Moby clic:
All past applications (and the personal data they contain) submitted via Moby clic are automatically deleted 12 months after the application date.
- d) Moby clic cookies: These cookies are deleted at the end of their validity period.

12. Will my personal data be used for automated decision-making or profiling?⁴

No.

13. What are my rights as regards my personal data?

You have the following rights as regards your personal data:

1. Right of access

You may ask us directly:

- Whether we hold personal information about you; and
- To send you all the personal data we hold about you.

You can exercise this right of access to check whether the information is correct and, if necessary, ask us to rectify or erase it if it is incorrect or out of date.

2. Right to modification

You can ask us to rectify any incorrect information about you. This will avoid us passing on or processing incorrect information about you.

³ At 31 August 2018, only the following countries and territories were considered to be adequate in terms of personal data security: Andorra, Argentina, Faroe Islands, Guernsey, Isle of Man, Israel, Jersey, New Zealand, Switzerland and Uruguay; the following countries were considered to be partially adequate: Canada and the United States.

⁴ **Profiling** means any form of automated processing of personal data to evaluate certain things about an individual, for example to analyse or predict their performance at work, financial position, health, personal preferences, interests, reliability, behaviour, location and travel.

3. Right to erasure

4. Right to object

You can object, for legitimate reasons, to your personal data being passed on, transferred or retained.

5. Right to restrict processing

You can ask that only the data required by the data controller be processed.

6. Right to data portability

You may retrieve part of your personal data in an open, machine readable format (electronic file). You can then store or move your personal data easily from one IT environment to another for re-use.

7. Right not to be subject to solely automated decisions

The right not to be subject to a decision based solely on automated processing includes profiling and, generally, all data processing that produces legal effects concerning you or that similarly affects you.

However, this right does not apply when the decision taken following an automated decision:

- is required for the conclusion or implementation of a contract between you and the data controller,
- is authorised by European Union law, or French law, and also makes provisions for appropriate measures to protect your rights and freedoms and your legitimate interests,
- is based on your explicit consent.

8. Right to withdraw consent to processing at any time (if such processing is based on your consent)

9. Post-mortem right

You can give us instructions as to what to do with your personal data after your death.

NB: These are not absolute rights. You may exercise them within the applicable legal framework and within the limits of those rights. In some cases, we may refuse your request (legal requirement, compliance with our commitments to you, etc.). If we do, we will tell you why.

For further information about your rights, you may consult the CNIL's (French Data Protection Authority) website: <https://www.cnil.fr/fr/comprendre-vos-droits>

14. What happens if I object to my personal data being processed or if I withdraw my consent?

If you ask us to delete the personal data held about you on the Mobyctic platform (necessary data for signing into your user account), you will no longer be able to use the platform to apply for job offers from Bouygues group entities advertised via Mobyctic.

At any time, you can sign in to the Mobyctic platform and:

- Delete your user account;
- Edit or delete your CVs and/or other documents you have saved in your user account.

You can only apply for job offers via Mobyctic if you have uploaded a CV.

NB: In certain limited circumstances, we may not be able to fulfil your request (legal obligation, etc.). If this is the case, we will tell you why.

15. How do I exercise my rights and who should I contact?

To exercise your rights in relation to your Mobyctic user account and the personal data contained in your account, you may contact:

Bouygues

For the attention of the Legal Affairs Department

32 avenue Hoche

75008 Paris, France

Registration No. 572 015 246 (Paris)

E-mail address;: rgpd@bouygues.com

If you wish to exercise your rights with regard to the processing of your personal data by the entity to which you have sent your application, please contact the HR department of the entity where you have applied for the position or the Data Protection Office of the Business segment concerned (if the Business segment has appointed one).

In case of difficulty, you may also make a complaint to the competent supervisory authorities.

In France, this is the CNIL (<https://www.cnil.fr/fr/agir>)

