

Information notice on the processing of candidates' personal data

Version 03.2023

Respect for privacy is a fundamental right and one of Doctolib's core values.

Doctolib undertakes to comply with French and European regulations on the protection of personal data, in particular the General (EU) Data Protection Regulation of 27 April 2016 ("GDPR") and the amended French Data Protection Act of 6 January 1978 ("LIL").

DEFINITIONS

Terms used in this Personal Data Protection Policy (hereinafter "Policy") with capital letters have been defined here.

Candidate means the person who has sent an application and/or has been contacted by Doctolib or through a recruitment agency in connection with a job offer.

Recipient means the natural or legal person, public authority, department or any other body that receives communication of Personal Data, whether or not it is a third party as defined by the General Data Protection Regulation (GDPR).

Doctolib means Doctolib, Société par Actions Simplifiées, registered with the RCS of Nanterre under the number 794 598 813, whose registered office is located at 54 quai Charles Pasqua 92300 Levallois Perret.

Personal data means any information relating to an identified or identifiable natural person as defined by the General Data Protection Regulation (GDPR).

Tool means the hardware, files, programs, software and software packages, all networks (local and external), servers, information systems, e-mail, instant messaging, storage spaces, and collaborative tools belonging to Doctolib entities and which may be used by Doctolib employees in the context of recruiting Candidates.

HR or **Human Resources** means any department or member of a department involved in personnel management, recruitment, payroll or relations with staff representative bodies within the Doctolib entities.

Data controller has the meaning assigned to it by the GDPR.

GDPR means the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data repealing Directive 95/46/EC.

Employee means any natural person recruited by a Doctolib entity and bound to it by an employment contract characterised by the performance of work, the payment of remuneration and the existence of a legal relationship of subordination.

Subcontractor has the meaning assigned to it by the GDPR.

Career Site means the Doctolib application site accessible at this address <https://careers.doctolib.fr/>

Thematic Site means the sites on which visitors and Candidates may register in order to receive information on new jobs offered by Doctolib and/or to submit an application.

Processing of personal data has the meaning assigned to it by the GDPR.

PURPOSE OF THIS POLICY

The purpose of this Policy is to inform Candidates about the Personal Data collected and processed by Doctolib.

It applies to all Candidates.

ORIGIN OF PERSONAL DATA

Candidates are informed of the purposes for which their Personal Data is collected via this Privacy Policy.

1. Personal Data collected from the Candidate

Personal Data concerning Candidates is collected from them by Doctolib when it receives an internal or external application and during interviews (i.e. resume; answers to questions during interviews).

2. Personal Data collected indirectly from the Candidate

Doctolib collects personal data from Candidates indirectly, in particular by using (i) recommendation tools offered by Doctolib to its Employees (e.g. Trusty); (ii) tools used in the context of Candidate hunting (e.g. LinkedIn, Gem, etc.); (iii) recruitment agencies.

PROCESSING OF PERSONAL DATA COLLECTED

1. Necessity of collection

When applying for a job, conducting interviews and filling out his or her administrative file, the Candidate is required to provide Doctolib with certain Personal Data necessary for the management of his or her application and, where applicable, for the establishment of his or her employment contract. If the Candidate does not wish to communicate the information requested, or objects to its use by Doctolib, he/she will not be able to participate in the recruitment process and his/her employment contract, if any, will not be established.

2. Retention periods

All Personal Data collected are processed and kept for a limited period of time depending on the purpose of the processing and the applicable legislation.

At the end of the retention periods, the Candidates' Personal Data are deleted.

3. Description of the Processing

Doctolib takes the appropriate measures to ensure the protection and confidentiality of the Personal Data it holds in compliance with the provisions of the GDPR and national legislation.

Information followed by an asterisk* is optional.

Why is personal data used ?	What personal data are used ?	On what legal basis is personal data processed ?	How long are personal data kept ?
Doctolib employee referral program	<ul style="list-style-type: none"> ● Name, ● First name, ● Identification number of the recommended Candidate, ● Name of the position for which the Candidate is being referred*, ● Relationship (family/close friend; former colleague; former classmate; personal acquaintance; professional acquaintance; no particular relationship), ● Knowledge of the use of the tool (yes/no), ● Level of knowledge of the recommended person (1 to 7), ● Email, ● Phone number*, ● Link to linkedin account*, ● Reason for referral (free field), ● Candidate's resume*, ● Reason(s) why the Employee recommends this Candidate 	<p style="text-align: center;">Legitimate interest</p>	<p>Retention until the end of the recruitment procedure for the position in question</p> <p>Then storage of the data for 5 years in an intermediate database in the case of a legal action for compensation for damage resulting from discrimination (L. 1134-5 of the Labour Code)</p>
Searching for and identifying relevant profiles to attract applications and receiving applications <i>For example :</i>	<ul style="list-style-type: none"> ● Name, ● First name, ● Candidate's identification number, ● Telephone number, ● City of residence*, ● Information contained in the resume (date of birth, postal address, email 	<p style="text-align: center;">Legitimate interest</p>	<p>Retention until the end of the recruitment procedure for the position in question</p> <p>Then storage of the data for 5 years in an intermediate database in the case of a legal action for</p>

<ul style="list-style-type: none"> - <i>management of Doctolib career sites,</i> - <i>creation of pages for receiving applications on thematic sites,</i> - <i>publication and promotion of job offers on dedicated websites</i> 	<p>address, telephone number, photo, driving licence, hobbies, past experiences, current company, diplomas and training, level of tool mastery...),</p> <ul style="list-style-type: none"> ● Letter of motivation*, ● Language level, ● Ability to work in one of the countries in which Doctolib is present, ● Link to the profile on a professional website (linkedin...)*, ● Link to a dedicated professional website*. 		<p>compensation for damage resulting from discrimination (L. 1134-5 of the Labour Code)</p>
<p>Pre-selection of Candidates <i>For example :</i></p> <ul style="list-style-type: none"> - <i>sorting,</i> - <i>registering, filing of resumes and cover letters</i> 	<ul style="list-style-type: none"> ● Name, ● First name, ● Candidate's identification number, ● Telephone number, ● City of residence, ● Information contained in the resume (date of birth, postal address, email address, telephone number, photo, driving licence, hobbies, past experiences, current company, diplomas and training, level of tool mastery...), ● Letter of motivation, ● Language level, ● Ability to work in one of the countries in which Doctolib is present ● Link to the profile on a professional website (linkedin...)*, ● Link to a dedicated professional website*. 	<p>Performance of the contract (pre-contractual measures to the employment contract, when the Candidate applies on his/her own initiative)</p> <p>Or legitimate interest</p>	<p>Retention until the end of the recruitment procedure for the position in question</p> <p>Then storage of the data for 5 years in an intermediate database in the case of a legal action for compensation for damage resulting from discrimination (L. 1134-5 of the Labour Code)</p>

<p>Management of recruitment procedures in conjunction with the hierarchy of the employees to be recruited</p> <p><i>For example :</i></p> <ul style="list-style-type: none"> - <i>processing of information collected during telephone, face-to-face and video interviews</i> - <i>analysis of applications and evaluation of Candidates, response to Job Applicants...</i> 	<ul style="list-style-type: none"> ● Name, ● First name, ● Candidate's identification number, ● Telephone number, ● City of residence, ● Information contained in the resume (date of birth, postal address, email address, telephone number, photo, driving licence, hobbies, past experiences, current company, diplomas and training, level of tool mastery...), ● Letter of motivation*, ● Language level, ● Ability to work in one of the countries in which Doctolib is present, ● Link to the profile on a professional website (linkedin...), ● Link to a dedicated professional website <p>On the interviews:</p> <ul style="list-style-type: none"> ● Dates of creation and execution of the interviews, ● Date and content of interview reports, ● Response to questions, ● Current and desired remuneration, ● Evaluation reports written by the recruiters, ● Final interview decision, ● Reasons for rejection <p>On technical tests (for developer recruitment):</p>	<p>Performance of the contract (pre-contractual measures to the employment contract, when the Candidate applies on his/her own initiative)</p> <p>Or legitimate interest</p>	<p>Retention until the end of the recruitment procedure for the position in question</p> <p>Then storage of the data for 5 years in an intermediate database in the case of a legal action for compensation for damage resulting from discrimination (L. 1134-5 of the Labour Code)</p>
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	<ul style="list-style-type: none"> ● Response to the test, ● Ranking of the Candidate in relation to other Candidates following the technical assessment, ● Duration of the test, ● Score, ● Dates (sending, opening, beginning and end of the test) <p>On the application :</p> <ul style="list-style-type: none"> ● Positions for which the Candidate is applying (title, department, location), ● Date of entry and last activity on the application in the system ● Status of the application (Active, Rejected, Recruited), ● Source of the application <p>On offers :</p> <ul style="list-style-type: none"> ● Date of creation and resolution of offers, ● Status of offers (In progress, Rejected, Accepted) 		
<p>Finalisation of the recruitment process for the hiring of the Candidate</p> <p><i>For example :</i></p> <ul style="list-style-type: none"> - <i>collecting the information needed to formalise the</i> 	<ul style="list-style-type: none"> ● Marital status, ● Name, ● First name, ● Applicant's identification number, ● Date of birth, ● Family status, ● Nationality, ● ID number and copy, ● Email address, ● Postal address, 	<p>Performance of the contract (pre-contractual measures to the employment contract, when the Candidate applies on his/her own initiative)</p> <p>For mandatory formalities: legal obligation (R. 5221-41 Labour Code)</p>	<p>The period during which the employee is part of the workforce and then 5 years from the date of the employee's departure from the organisation in the intermediate archive (prescription of the time limit for legal action related to discrimination)</p> <p>Extracts from criminal records are</p>

<p><i>employment contract,</i></p> <ul style="list-style-type: none"> - <i>filling in the administrative file of the selected Candidates,</i> - <i>completion of compulsory formalities</i> 	<ul style="list-style-type: none"> ● For foreign workers: type and serial number of the work permit, ● Bank statement, ● Social security registration number, ● Salary, ● Job title <p>For certain posts requiring it and, where applicable :</p> <ul style="list-style-type: none"> ● verification of the extract from the B3 criminal record (yes/no), ● Verification of any links declaration of interest, ● due diligence (e.g. checking the reputation of the Candidates, taking references) 		not kept
<p>Building a resume library</p> <p><i>For example :</i></p> <ul style="list-style-type: none"> - <i>recontacting interesting Candidates in order to propose new interviews</i> 	<ul style="list-style-type: none"> ● Name, ● First name, ● Applicant's identification number, ● Telephone number, ● City of residence, ● Information contained in the resume (date of birth, postal address, email address, telephone number, photo, driving licence, hobbies, past experiences, current company, diplomas and training, level of tool mastery...), ● Letter of motivation, ● Language level, ● Ability to work in one of the countries in which Doctolib is present, ● Link to the profile on a professional 	Consent	At the earliest between : Two years from the expression of consent or until withdrawal of consent by the Applicant

	<p>website (linkedin...),</p> <ul style="list-style-type: none"> ● Link to a dedicated professional website <p>On the interviews:</p> <ul style="list-style-type: none"> ● Dates of creation and execution of the interviews, ● Date and content of interview reports, ● Answer to questions ● Current and desired remuneration ● Evaluation reports written by the recruiters ● Final decision of the interviews ● Reasons for rejection <p>On technical tests (for developer recruitment):</p> <ul style="list-style-type: none"> ● Response to the test, ● Ranking of the candidate in relation to other candidates following the technical assessment, ● Time taken to complete the test, ● Note, ● Dates (sending, opening, beginning and end of the test) <p>On the application :</p> <ul style="list-style-type: none"> ● Positions for which the Candidate is applying (title, department, location), ● Date of entry and last activity on the application in the system ● Status of the application (Active, Rejected, Recruited), ● Source of the application 		
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	<p>On offers :</p> <ul style="list-style-type: none"> • Date of creation and resolution of offers, • Status of offers (In progress, Rejected, Accepted) 		
<p>Production of statistics and anonymisation of data to improve the recruitment process</p> <p><i>For example :</i></p> <ul style="list-style-type: none"> - Performance evaluation of recruitment processes 	<p>On the interviews:</p> <ul style="list-style-type: none"> • Dates of creation and completion of interviews, • Date of interview reports, • Current and desired remuneration, • Score based on the Candidate's ranking following the technical assessment (for developer recruitment), • Final interview decision, • Reasons for rejection <p>On the application:</p> <ul style="list-style-type: none"> • Positions for which the Candidate is applying (title, department, location), • Date of entry and last activity on the application in the system, • Status of the application (Active, Rejected, Recruited), • Source of the application <p>On offers :</p> <ul style="list-style-type: none"> • Date of creation and resolution of offers, • Status of offers (In progress, Rejected, Accepted) 	<p>Legitimate interest</p>	<p>Two years from the date of application</p>

<p>Evaluation of the recruitment process by the Candidates</p>	<ul style="list-style-type: none"> • Name, • First name, • Email, • Candidate's identification number, • Date of entry into the recruitment tool, • Answer to the questions on the evaluation of the recruitment process, • Name, department, location, job title, contract type of the position the Candidate applied for • Origin of the Candidate • Date of resolution of the offer • Date and reason for rejection of the application 	<p>Consent</p>	<p>At the earliest between : 60 days from the response to the questionnaire or until the Candidate withdraws the consent</p>
<p>Sending out newsletters</p> <p><i>For example :</i></p> <ul style="list-style-type: none"> - email communication of new jobs 	<ul style="list-style-type: none"> • Name, • First name, • Email address, • Telephone number*, • City and country of residence*, • Year of graduation, • Jobs of interest (commercial, IT...) • Statistics related to the newsletter service 	<p>Consent</p>	<p>At the earliest between : Two years from the expression of consent or until withdrawal of consent by the Candidate</p>
<p>Management of Candidate requests</p> <p><i>For example :</i></p> <ul style="list-style-type: none"> - Processing and management of Applicants' requests for IT 	<ul style="list-style-type: none"> • Name, • First name, • Email address, • Content of the request, • Identification (when necessary). 	<p>For requests related to the GDPR: legal obligation (articles 12 and following of the GDPR)</p> <p>For other requests : legitimate interest</p>	<p>5 years from the date of the request</p> <p>Identity document: kept for the time necessary to verify identity.</p>

<i>rights and freedoms</i> - <i>generation of statistics on requests</i>			
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SUBCONTRACTORS AND RECIPIENTS OF PERSONAL DATA

Internal use: The Candidate's Personal Data is treated as confidential. Employees of departments involved in Human Resources management may have access to it (recruitment officers, managers, etc.) of Doctolib SAS and its subsidiaries, within the limits of their respective responsibilities and exclusively in order to achieve the purposes of this policy.

Recipients of the data:

The Candidates' data may, in certain cases, be transmitted to the recipients listed below:

- recruitment agencies used by Doctolib to manage recruitment,
- external consultants (law firms) for the purposes of support and management of litigation.

In the context of recruitment, the Candidate may be required to attend video-conference interviews (e.g. Google meet, etc.).

Doctolib also uses subcontractors to manage Candidate data, a list of which may be communicated to the persons concerned on request to hr.dataprivacy@doctolib.com.

Cross-border transfer: Doctolib may use service providers located outside the European Union. If the transfer takes place to a third country where the legislation has not been recognized as offering an adequate level of protection of Personal Data, Doctolib ensures that the necessary measures are put in place in accordance with the French Data Protection Act and the GDPR.

EXERCISING YOUR RIGHTS

1. Rights of Candidates to their Personal Data

In accordance with the European regulations in force, Doctolib Candidates have the following rights:

- **Right of access** (Article 15 GDPR) and rectification (Article 16 GDPR), update, completeness of Candidates' Personal Data: Candidates have the right to access their Personal Data held by Doctolib and to request rectification or update (more information).
- **Right to erasure** of Candidates' Personal Data (Article 17 of the GDPR), (i) when it is no longer necessary, (ii) the Candidate has withdrawn consent, (iii) the Candidate objects to the processing, (iv) the processing is unlawful or in order to comply with a legal obligation (read more).
- **Right to withdraw consent** at any time (Article 13-2c GDPR) if such processing is based on consent.

- **Right to limitation** of processing of Candidates' Personal Data (Article 18 GDPR): this right means that the processing of Candidates' Personal Data that Doctolib may carry out is limited, so that the Personal Data is retained, but Doctolib cannot use or process it (read more).
- **Right to object** to the processing of Candidates' Personal Data (Article 21 GDPR): Candidates may at any time object to the processing of their Personal Data where the processing is based on Doctolib's legitimate interest unless there are compelling legitimate grounds for Doctolib to do so (read more).
- **Right to portability** of Personal Data provided by Candidates, where such Personal Data is subject to automated processing based on their consent or on a contract (Article 20 GDPR). Candidates have the right to move, copy or transmit their Personal Data from Doctolib's database to another database (read more).
- **Right to determine the fate** of Personal Data after their death and to choose to whom Doctolib shall communicate (or not) the Personal Data (more information). As soon as Doctolib becomes aware of the death of a Candidate and in the absence of instructions from the Candidate, Doctolib undertakes to destroy his/her Personal Information, unless its retention is necessary for evidentiary purposes or to meet a legal obligation.

For more information on their rights, Candidates may consult the CNIL [website](#).

2. How to exercise your rights:

If the Candidate wishes to know how Doctolib uses his/her Personal Data, or to exercise his/her rights, the Candidate may contact Doctolib by e-mail at hr.dataprivacy@doctolib.com

In this case, the Candidate must indicate the Personal Data concerned by his/her request.

Candidates in France may file a complaint with the supervisory authorities, and in particular with the CNIL (<https://www.cnil.fr/fr/plaintes>).

SECURITY

Doctolib takes all necessary precautions to preserve the security of Candidates' Personal Data and, in particular, to prevent it from being distorted, damaged or accessed by unauthorized third parties (e.g. physical protection of the premises, authentication procedures with personal and secure access via confidential identifiers and passwords, logging of connections). Access to this data is limited to Employees according to the principle of least privilege. They will process personal data in accordance with Doctolib's instructions and are subject to an obligation of confidentiality.

Doctolib regularly conducts differentiated penetration tests to monitor, evaluate and assess the effectiveness of the security measures in place.

Procedures are also in place to deal with any suspected breach of personal data. Applicants and any relevant regulator will be notified of such a breach where required by law.

Privacy by Design: Doctolib ensures that data protection and security are taken into account in the planning and development of the Personal Data Processes it implements.

CONDITIONS OF APPLICATION OF THE POLICY

Doctolib may modify, supplement or update this Policy in order to take into account any legal, regulatory, jurisprudential and/or technical developments.

In the event of a significant change to this Policy, Doctolib undertakes to publish it at least thirty (30) days before its effective date.

After this period, all Submissions will be subject to the new Policy.

CONTACT US - DPO CONTACT DETAILS

Any Candidate may address questions or complaints regarding Doctolib's compliance with this Policy, or provide Doctolib with recommendations or comments aimed at improving the quality of this Policy. The Candidate may contact Doctolib in writing at the following address Doctolib - DPO, 54 quai Charles Pasqua, 92300 Levallois-Perret or contact.dataprivacy@doctolib.com