



## **BNP Paribas Corporate and Institutional Banking Czech Republic Privacy Notice for Recruitment**

Date valid from: September 2021

At BNP Paribas S.A., registration number 662042449 RCS Paris, with its registered office at 5009 Paris, 16 Boulevard des Italiens, France, acting in the Czech Republic through its branch office **BNP Paribas S.A., pobočka Česká republika**, ID 06325416, with its registered office at Main Point Pankrác, Milevská 2095/5, 140 00 Praha 4, Czech Republic, registered in the Commercial Register maintained by the Municipal Court in Prague, Section A, File 78303 (hereinafter referred to as "BNPP") we recognize that privacy is important and are committed to follow the highest standards of personal data processing under Czech and European legislation. We have developed this Privacy Notice for Recruitment (the "Notice") to inform you of how BNPP will use the information you submit to BNPP through the email, or in any other way as part of a job application or job search process.

When reading this Notice, please keep in mind that "Personal Data" (in this Notice also referred to as "Data" or "your Data") means any information or set of information from which we are able, directly or indirectly, to personally identify you, in particular by reference to an identifier, e.g. name and surname, e-mail address, phone number.

When this Notice mentions "we" or "us", it refers to the controller of your Personal Data under this Notice, i.e. BNP Paribas S.A., registration number 662042449 RCS Paris, with its registered office at 5009 Paris, 16 Boulevard des Italiens, France, acting in the Czech Republic through its branch office BNP Paribas S.A., pobočka Česká republika, ID 06325416, with its registered office at Main Point Pankrác, Milevská 2095/5, 140 00 Praha 4, Czech Republic, contact person is Ms. Ilona Kohoutová, HR and Office Manager, BNP Paribas S.A., pobočka Česká republika, Main Point Pankrác, Milevská 2095/5, 140 00 Praha 4, Czech Republic which may be interested in offering you a job position or which otherwise decides which of your Data are collected and how they are used.

In compliance with applicable data protection laws in the Czech Republic, we request from you to take some time to read this Notice in full. Regarding the collection and processing of certain types of your Data, your express consent may be also required, as further described in this Notice.

### **WHAT TYPES OF DATA WE WILL PROCESS**

This Notice concerns all Data that you decide to or are requested to submit in relation to your application for a particular job position, including the following:

- a. Identification Data: Name, email address, telephone number, or other contact information;
- b. Job Application Data: CV, cover letter, previous work experience, education, additional qualification, or other information regarding your professional qualification and experience, education, additional skills and abilities, professional interest, etc. you provide for our consideration in the recruitment process;
- c. Image: We do not require from job candidates to include photos as part of the job application documentation. It is up to you if you would like to voluntarily submit such Data;

- d. Identification of the Job and Personal Requirements: Type of employment sought, desired salary, willingness to relocate, or other job preferences you decide to voluntarily submit;
- e. Criminal Records and sanction lists: We will request to view an up-to-date Criminal Records extract from the candidates to whom we send a job offer and we will process their personal data in the scope of the name, date and place of birth, nationality / citizenship, tax domicile, for the necessary purposes of checking the sanction lists.

**NOTE:** In accordance with the internal policies, BNPP may not employ any staff member who is subject to any economic or trade sanction or restrictive measure enacted, administered, imposed or enforced by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), the U.S. Department of State, the United Nations Security Council, the European Union and/or other relevant sanctions authority on the basis of the relevant sanction lists (hereinafter referred to as the "sanction lists"). For further details please submit a request to contact details listed at the section CONTACT US.

- f. Referees: Reference letters, names and contact information for referees.

**NOTE:** If you decide to attach reference letters to your job application, it is your responsibility to obtain consent from referees and inform them of the purposes for which their Data may be processed by us (based on this Notice) before providing their personal information to us.

We will not contact directly your referees, unless you explicitly consent to such approach. We will provide you with separate model consent upon your request.

- g. Special Categories of Data: This Data refers to any information, revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning sex life or sexual orientation.

**We do not require from job candidates to include any Special Categories of Data as part of the job application documentation. Please do not include such Data.**

In very limited occasions, we may request you to provide Data regarding your health but only where this is **explicitly required under law** for the particular position you apply to. If this is the case, information about this requirement and the statutory ground based on which we will collect this data would be explicitly specified in the Job Offer.

and

- h. Any other information that you decide to voluntarily share: hobbies, interests, professional plans, how you found out about the job offer, what motivates you to apply for us, etc.

You can choose what types of information to submit as part of your job application. Normally, the information in p. a), b) and d) would be strictly necessary to be provided, so we can consider your job application for the particular position. Thus, if you decide not to provide such Data, we may be prevented from further processing your application.

In certain cases, the Job Offer may specify additional categories of Data required for the particular position (see p. e) and f) above). If so, provision of such information would be also treated as mandatory (please check your Job Offer again).

Submitting of any other information would be dependent entirely on you and would be treated as voluntary.

Note, that in case of your selection for the job position you have applied for, the above categories of Data will further form part of your employment file (dossier) with BNPP (more information will be provided upon the start of your employment).

Further in the process or during interviews, we may ask for your consent before we obtain additional information from third parties (e.g. former employers for references provided in accordance with the national law) or will, where required by law, notify you that we obtained such data from those third parties.

#### **PURPOSES OF PROCESSING**

Any Data provided by you in the recruitment procedure will be processed only for the purposes of reviewing and assessing your eligibility as a job candidate for the particular job position as well as for the purposes of our legal and internal compliance, namely:

- To assess your skills, qualifications and interests against our career opportunities, to maintain our relationship during the recruitment process, including by calling you and inviting you to interviews, exchange of offers and terms of employment, etc.;
- To verify your information, to run our internal compliance and conflict checks and to conduct reference / background checks (if required under law or subject to your explicit consent);
- To communicate with you and inform you of other career opportunities (if we have your consent to include you as part of our talents data base, see below);
- For security and protection of our organization, IT networks and BNPP information;
- To improve our recruitment process; and
- To exercise or defense legal claims, whether in court, administrative or other legal proceedings;
- To procure screening on sanction lists or black lists, to the extent necessary.

If in future we would need to process your personal data for a purpose other than the above we will provide you with information on that purpose and any other relevant information. Where necessary, we may seek for your consent before processing your Data for other purposes.

Note, that in case of your selection for the job position you have applied for, the above categories of Data will be further processed for employment purposes (more information will be provided upon the start of your employment).

## **LEGAL BASES FOR PROCESSING OF YOUR DATA**

In order to be able to process your Data in our recruitment procedure, we rely on different legal bases, including:

- Your consent to BNPP to process all Data provided in your CV and related documents, which you have given us by deciding to apply to our job offer and submit your CV and related documents, after reading this Notice; and/or
- The necessity to establish a contractual relationship with you or to take steps in this direction, at your request; and/or
- The necessity for us to comply with legal obligations related to recruitment procedures and/or our regulated type of business activity; and/or
- The necessity to pursue our legitimate interests, including:
  - To ensure that our organization, IT networks and information are secure;
  - To administer and generally conduct business within and across BNPP; and
  - To protect our interest and rights in event of investigated, suspected or actual violations of law.
- Your specific consent (only when legally required or permitted).

**NOTE:** If we rely on your consent as a legal basis for processing your Data, you may withdraw your consent at any time by submitting a Withdrawal Request to the following e-mail [cz.hr.info.gdpr@bnpparibas.com](mailto:cz.hr.info.gdpr@bnpparibas.com) (see section CONTACT US). As of the receipt of your Withdrawal, any Data to which the Withdrawal refers would be deleted from our files and records. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. For more information, please read our Privacy Policy here <http://www.bnpparibas.cz/en/gdpr/>.

## **BACKGROUND CHECKS**

Considering the business activity of the BNPP, for certain position we may need to conduct additional background checks to meet statutory and internal compliance and conflict of interest procedures and verify your eligibility to work at BNPP.

In this regard, we may collect additional data about you from professional social media platforms where you maintain an open profile (e.g. LinkedIn) but only to the extent relevant for the applied job position.

## **AUTOMATED DECISION MAKING**

We do not apply Automated Decision Making, including profiling, to job candidates in the recruitment process.

## **HOW LONG WILL WE KEEP YOUR DATA**

We would like to keep your Data until our open job position is filled. We can not estimate the exact time period for completion of a recruitment process, but we consider this period would not extend over 5-6 months and we will stop processing the Data for the purposes of the recruitment campaign at the latest when the probation period (3 months) of the candidate who entered into the employment relationship is terminated.

When that period is over, we will retain your Data only to the extent strictly necessary for the purposes of exercising or defending legal claims, whether in court, administrative or other legal proceedings for a maximum time period of 4 years. We will delete all your other Data submitted in the recruitment process, unless you give us your consent to keep your Data in our database for future recruitment processes. In such case, please read and complete the model consent that we will provide you upon your request.

Note, that in case you are selected for the job position you have applied for, the above categories of Data will continue being processed as part of your employment file (dossier) with BNPP. The legal ground for such processing is legitimate interest of BNPP to have your employment file completed with Data obtained during the recruitment process (more information will be provided upon the start of your employment).

#### **YOUR RIGHTS AS A DATA SUBJECT**

In relation to your Data submitted for recruitment purposes, you have the right to request from BNPP access to, rectification and/or erasure of the Data or certain categories thereof or restriction of processing as well as the right to data portability.

You also have the right to object at any time, on reasons relating to the particular situation, to processing of any category of your Data which we ground on our legitimate interest (see section LEGAL BASES FOR PROCESSING OF YOUR DATA above). In such case we will no longer process this Data unless we can demonstrate to you compelling legitimate grounds which may ground such further processing.

For the exercise of your rights in accordance with the General Data Protection Regulation (EU) 2016/679, you can submit a written, dated and signed request at the following address: BNP Paribas S.A., pobočka Česká republika, to the attention of the Data Protection Officer, Main Point Pankrác, Milevská 2095/5, 140 00 Praha 4, Czech Republic and/or via e-mail at [cz.hr.info.gdpr@bnpparibas.com](mailto:cz.hr.info.gdpr@bnpparibas.com)

Your request will be reviewed and you will receive an answer within 1 month in accordance with the General Data Protection Regulation (EU) 2016/679.

For further information on your rights and how to enact them, please refer to our Privacy Policy, accessible here <http://www.bnpparibas.cz/en/gdpr/>.

#### **ACCESS AND DISCLOSURE OF YOUR DATA**

BNPP Human Resources (and relevant recruiting managers involved in the recruitment process) will have access to your Data for the purposes listed above. Where third parties (such as HR consultants) are involved in the recruitment process they will have access on a Need-to-Know basis and will be bound by terms of confidentiality and this Notice.

In view of the activity of BNPP and our pertinence to the corporate group of BNPP, certain Data collected by us in the recruitment process, may be disclosed to other members of the BNPP group, to contractual partners (service providers, such as recruitment agency) working on behalf of BNPP or the BNPP group, as well as to be transferred from Czech Republic to other countries, including outside of EU, where needed for the purpose.

The list of third parties to whom the Data may be disclosed is available upon request. In this regard, BNPP has taken adequate safeguards, pursuant to the legal provisions, to ensure that these third parties, referred to also as "Data Processor/s" comply with their obligations regarding the protection of your Data and have also implemented adequate technical and organizational measures to safeguard your Data. The Data Processor/s have the same obligations to protect your personal data in accordance with the General Data Protection Regulation (EU) 2016/679, as we do.

#### **TRANSFER OF YOUR DATA**

Any transfers of your Data to the Data Processors referred above will be conducted only after complying with the safety and other regulatory requirements imposed by the Czech and European legislation. Where non-EU jurisdictions are not cleared by adequacy decisions of the European Commission, transfers thereto would be conducted only based on implemented Standard Contractual Clauses, approved by the European Commission (available at: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)).

#### **HOW WILL WE SECURE YOUR DATA?**

We recognize our responsibility to protect the information you provide to us. BNPP takes appropriate technical, organizational, and legal steps to protect job application information, including secure servers, firewalls, and encryption of application data. For further information on our security measures, please refer to our Privacy Policy, accessible here <http://www.bnpparibas.cz/en/gdpr/>.

#### **CONTACT US**

Please feel free to ask us questions concerning our Notice, request a copy of your Data or to access, delete, correct or update your Data or withdraw your consent for processing of your personal Data or certain categories of data (see above) or if you want to address any safety and security related requests, to our Data Protection Officer at the address below:

BNP Paribas S.A., pobočka Česká republika, Data Protection Officer, Main Point Pankrác, Milevská 2095/5, 140 00 Praha 4, [cz.hr.info.gdpr@bnpparibas.com](mailto:cz.hr.info.gdpr@bnpparibas.com).

#### **COMPLAINS TO LOCAL AUTHORITIES**

You also have the right to make a complaint to the national supervisory authority for personal data processing or to take other legal action as provided by the General Data Protection Regulation (EU) 2016/679.

Thus, if you are not satisfied by the way we process your Data or the response received by us on any request from your side, you have the right to lodge a formal complaint with the Czech Office for Personal Data Protection (OPDP). Full details regarding the formal requirements of the complaint may be accessed on OPDP's website: <https://www.uoou.cz/> and the contact details for submission of a complaint are as follows:

ADDRESSEE: Czech Office for Personal Data Protection (*Úřad pro ochranu osobních údajů*), Pplk. Sochora 27, 170 00 Prague 7, Czech Republic

TELEPHONE NUMBER: +420 234 665 111

EMAIL: [posta@uoou.cz](mailto:posta@uoou.cz)

DATA BOX: qkbaa2n