



RISESMART FRANCE PERSONAL DATA PROTECTION POLICY FOR HR CONSULTANCY PARTNERS

When we process your personal data, we will use it in accordance with our **Personal Data Protection Policy**.

RiseSmart believes that respect for the privacy of its participants and applicants, as well as of other persons with whom it has relationships and of the visitors to its website, is of crucial importance. Therefore, your personal data will be processed and protected with the greatest care possible, in accordance with the requirements of applicable data protection laws.

1. Who are we?

RiseSmart is a tool developed by RiseSmart, whose principal office is located at 55 Almaden Boulevard, Suite 800, San Jose, CA 95113, United States of America (hereinafter “**RiseSmart**”), which is deployed and operated by HR Consultancy Partners, a French *société par actions simplifiée* (simplified limited company) with a sole shareholder, which has share capital of €7,296,000, which is registered under number 490 748 670 01271 with the Paris Trade and Companies Register, and which is a subsidiary of Groupe Randstad in France (hereinafter “**HRCP**”).

2. Data controller

The **RiseSmart** platform is deployed in connection with an assignment for which the Customer has appointed **HRCP**. Under the law, the co-data controllers are, respectively, the Customer’s legal representative and the legal representative of Groupe Randstad in France, of which HR Consultancy Partners, whose address is 39 rue Saint Lazare,

75009 [Paris], is a member, and for which the data controller is Mr **François Béharel**.

3. Purposes and legal basis for processing

We collect and process your data in connection with the **RiseSmart** Service furnished to you and our Customers.

We collect your data and process it only with your consent, to perform the Contract entered into by **HRCP** and its Customer. The information required to manage your file is preceded by an * (other information is optional and has no impact on the review of your file).

In particular, your personal data is processed for the following purposes:

1. to provide you with our Services, including, but not limited to, to determine what specific assistance you expect from the Services;
2. to make offers and/or to provide you with information about the Services and other activities, as well as to be able to adapt them more completely to your requirements and status. These services are performed by our employees and are partially automated, and they may include providing job possibilities, job hunting training, assistance in preparing a CV and/or any other assistance Services;
3. to promote your personal development and employability, including through training, coaching and tests;
4. to assess your compatibility and availability with respect to jobs on permanent or fixed-term employment contracts or an assignment, in which case the results of tests, questionnaires, advisory meetings, discussions, checking of references, e-mail exchanges and other

channels, etc. may also be used;

5. to assist a Customer via the Services in connection with outplacement, career management services and skills assessments for its current and/or past employees;
6. to set an assignment in a contract with the Customer and to manage the contract and its implementation with the Customer;
7. to contact you for sales offers, information bulletins and promotional campaigns that may interest you, only if you have selected these options (opt-in);
8. to organise events for you, only if you have selected this option (opt-in);
9. to use it for management purposes, including information management (statistics, etc.), to perform internal controls and ensure the security of our company, to perform audits (internal/external), to analyse data, and to ensure the health and safety of our employees;
10. to meet quality objectives, for example in the case of a certification;
11. to improve the content and functioning of the Services, to better understand RS users and to improve the Services.

4. When do we collect your personal data?

We collect your data when you input or leave your data on the **RiseSmart** website, when you sign up as a participant/applicant with **RiseSmart** or

when your data is shared with us by our Customer (your current or former employer) pursuant to our contract with that Customer for Services.

We also collect your browsing data when you visit our platform without registering, by using cookies.

5. What personal data do we collect about you?

We collect and process personal data necessary to perform this Service. Some of this data is required to enable you to use our Services. Other data may be of use to further adapt the Services to your requirements and status, or to more specifically respond to the Customer's requests or obligations. You are personally responsible for the accuracy and pertinence of the data you provide to **RiseSmart**.

When you register as a participant with **HRCP**, you will provide us with personal data, including the information below. As stated above, only the fields marked with an asterisk are mandatory.

- name and detailed address, e-mail address and other contact information;
- date of birth, age and sex;
- curriculum vitae (CV), recent job titles, current and former employers, information about your studies and training, your appointments, your professional experience, your language skills, your employment objectives, your salary expectations and your interests;
- your professional profile on social media and the pertinent profiles of your network;
- information about training and classes you have taken and/or tests you have taken, on your own initiative or through us;
- information about your availability and resignation notice periods;
- other information that may be important for assessing your suitability, such as

references and certificates;

- an identity photo and a presentation video - on a voluntary basis;
- information about your progress and the status of your job hunt;
- information about the satisfaction of your customers and other feedback in relation to the job hunt and the Services.

HRCP's Customers may request that **HRCP** assist their current and/or past employees to look for employment by means of the Services ("Service Contract"). In connection with these Contracts, **HRCP** receives from the Customer a list of persons who are covered by the Services, with information about them. If you are included, the list the Customer prepares may contain your name, recent job title, home address, telephone number, e-mail address, department or unit and other personal data.

HRCP provides your personal data to **RiseSmart** solely for this purpose.

Customers may also directly register participants, using their data, on the RiseSmart platform, without **RiseSmart** or **HRCP** exercising any control over the data thus input.

For the purposes of your online account, which you can create for the Services, **RiseSmart** may request that you create a unique user name, password and a security question, and to use this login information to access your account. You agree to keep your user name, password and security question confidential. If you disclose them, you will be entirely responsible for any use, theft, alteration, abuse, disclosure or other loss of your personal data or other information derived therefrom.

By voluntarily providing your personal data to **RiseSmart** or by using the service (including in connection with a customer commitment of the company), you consent to **RiseSmart** using your personal data in accordance with the confidentiality policy. If you or the customer of the company provides personal data in connection with the Service, you acknowledge and accept that such personal data may be transferred from your or its current location to the offices and servers of **RiseSmart** and authorised third parties mentioned herein, in the United States or other countries.

6. Technical information and cookies

RiseSmart uses cookies and other web statistics to learn how visitors use its website. Such information helps us to improve the site. A cookie is a file stored on your computer. When you return to our website at a later time, these cookies may be recognised.

You may at any time deactivate the use of cookies for the **RiseSmart** website by configuring your web browser. Such deactivation may alter the graphic display of the site, and will prevent **RiseSmart** from reusing, each time you log on, the browsing preferences you had previously indicated. Such deactivation may also prevent proper performance of certain functionalities of the Services.

Cookies in connection with the Services may be installed by **RiseSmart** or third party publishers. This policy applies only to cookies installed by **RiseSmart**.

We advise you to read our “Cookie Policy” for more specific informations.

As is the case for many other websites, our platform automatically collects certain information about its users, such as your computer’s internet protocol (IP) address, your internet access provider’s IP address, the date and time you logged onto the website, the internet address from which you were directly redirected to our website, the control system you use, the sections of the website you visit, the pages of the website you view, the information you review, information about the types of devices you have used to navigate on the site, your geographical location and the materials you have uploaded to or downloaded from the website. This technical information is used to manage the website and for the system controller, as well as improve the website and its use. This technical information may be transferred to third parties and stored for subsequent use.

This **Personal Data Protection Policy** applies solely to the service provided by the **RiseSmart** tool. The policies and procedures described herein do not apply to other websites. Links from the Services should not be construed as indicating our

agreement with, or that we have viewed, such other websites. We recommend that you contact such sites directly to obtain information about their data protection policies.

7. Aggregated data

In connection with its constant efforts to understand and serve the users of its Services, **RiseSmart** often conducts searches of the geographical location, interests, results and behaviour of its users on the basis of personal data and other information provided to **RiseSmart**. These searches and other measures or analyses in relation to users' behaviour, results or tests may be compiled and analysed on an aggregate basis. Moreover, **RiseSmart** may share this aggregated data with its associates, agents and partners. This aggregated information does not identify you personally. **RiseSmart** may also disclose aggregated user statistics in order to describe **RiseSmart's** Services to current or potential partners, as well as to other third parties for other legal purposes.

8. Recipients of your data

In connection with the Service, **RiseSmart** may collect, transfer and use your personal data and other information for the purpose of providing you with the Service, including, but not limited to, in order to determine what specific assistance you expect from the Service and, if you are looking for a job, in order to provide you with job leads, training in job hunting techniques, help in preparing a CV and/or other forms of assistance.

RiseSmart may also use your personal data and other information

a) to identify and authenticate you, for example, when you access your Service account or communicate with **RiseSmart's** staff,

or

(b) internally, to increase or adjust the activity of **RiseSmart's** Service on your behalf, to report on the performance of the Service internally to **RiseSmart's** management, to

provide training and to manage **RiseSmart's** activities in any other manner.

Moreover, if you provide personal data or other information for a particular reason, **RiseSmart** may use the personal data or other information in relation with the reason for which you provided it. For example, if you contact **RiseSmart** by e-mail, **RiseSmart** will use the personal data you provide to answer your question or resolve your problem.

RiseSmart may make available to corporate customers progress reports and other information that may identify you, and indicate your level of use of the Service, the extent of your use of the Service, your progress and your status with respect to job search stages, your customer satisfaction or any other comment about the Service, in each case, individually or in an aggregated manner (collectively, "Progress Data"). From time to time, **RiseSmart** may provide you with tools to enable you to adjust the progress data that **RiseSmart** is authorised to share with the company's customer. If you have questions or concerns about the progress data **RiseSmart** may share with company's customer, please contact the Data Protection Officer.

HRCP may transfer your personal data to other **HRCP** entities, its Customers, subcontractors (e.g. data processing companies) that provide Services or perform assignments on its behalf, suppliers, the public authorities and other parties with whom it has business relationships, as well as any other cases in which **HRCP** is required to transfer your data, e.g. pursuant to court order.

The **RiseSmart** technology is furnished by **RiseSmart, Inc.**, which is based in the United States, and is supported by **RiseSmart HR Services Pvt. Ltd.** in India. Furthermore, Customers and other Randstad entities and subcontractors may be established outside France. Therefore, your personal data may be transferred outside France. Personal data transfers are governed by the European Commission's Standard Contractual Clauses. Necessary measures will be taken to ensure that your personal data that is transferred will be properly protected against any loss or illicit processing. In the course of developing its businesses, **HRCP** may sell or purchase business lines

or assets. In the event of a sale, merger, reorganisation, corporate dissolution or other similar event, personal data and other information may be included in the assets transferred.

Like many other companies, **RiseSmart** at times uses the services of other companies to perform certain functions in connection with its business, including providing analyses. If **RiseSmart** hires another company to perform a function in its name, **RiseSmart** may provide it with your personal data and other information to the extent necessary or of use to enable it to perform its specific function under supervision and in a secure manner.

HRCP and **RiseSmart** undertake that this information will not be sold or distributed to other third parties and, in particular, **HRCP** and **RiseSmart** will not share your data with third parties for sales solicitation purposes.

9. management

HRCP and **RiseSmart** will receive or input all of your personal data and similar information in electronic format. **RiseSmart** will compile this information in a database that it owns, which it will store in the United States of America or a third-party country, in compliance with the law. To ensure the accuracy of the personal data, **HRCP** or **RiseSmart** may request that you verify it.

The staff of **HRCP** and **RiseSmart** may access your online account from any worksite, determine the needs to be met and the actions to be taken and, if you are looking for a job, provide you with pertinent employment opportunities.

HRCP and **RiseSmart** will take the measures necessary to protect your personal data from loss, misappropriation, unauthorised access, publication and destruction. However, no electronic means of communication is totally secure or immune from error. In particular, e-mails and other communications to or from the service may not be secure. Therefore, it is your responsibility to be prudent about the information you send to **RiseSmart** using these means of communication.

10. Limits of this policy

This Personal Data Protection Policy also applies to data that you disclose when you use the service, even if collecting such data is not required for proper use. However, such voluntary disclosure shall not impose any new obligation on **HRCP** or **RiseSmart**. **RiseSmart** has the right, if such data is not necessary for the use of the service, to delete it unilaterally, or to use it without restriction in the contrary case.

11. Data Protection Officer

You may contact **HRCP's** Data Protection Officer by writing to the following address:

Groupe Randstad France
Correspondant Informatique et Libertés
276 avenue du Président Wilson
93211 Saint-Denis La Plaine Cedex

12. Rights concerning your data

In accordance with personal data protection laws, you have a right to access, correct, delete and transfer data about you, and to oppose or restrict the processing of your data. To exercise your rights, you may contact us, **in all cases including a copy of an identity document**, which is an indispensable requirement to process your request, **by writing us at the following address:**

Groupe Randstad France
Correspondant Informatique et Libertés
276 avenue du Président Wilson
93211 Saint-Denis La Plaine Cedex

You may at any time, and without having to state a reason, withdraw your consent to the processing of your personal data by Groupe Randstad in France.

You may also submit a complaint to the competent supervisory authority.

13. Storage period

In accordance with the law, your file may be kept for up to two years after your last contact.

14. Amendments

This version was drafted in December 2017.

For various reasons, **RiseSmart** may at any time amend, supplement or correct this Privacy Policy. You may review the Privacy Policy from time to time, in particular before providing personal data about you.