



Malt EU Candidate Privacy Notice

Last update: March 29 2022

In this EU Candidate Privacy Notice (“Notice”), references to “Malt”, “we”, “us” and “our” will mean the hiring Malt company (as specified in the job description or as the context of the job description provides. Malt and its subsidiaries will be referred to collectively as the “Malt Group”.

When you trust us with your application and personal details, Malt commits to protect your personal data. This Notice outlines how we collect, use and transfer (collectively “process”) the personal data of our candidates.

Who is the controller?

The controller is the hiring Malt company, 241 rue Saint Denis, 75002 Paris; it determines how and why your personal data is processed.

Processing of your personal data

How and why we process your personal data?

Malt will process your personal data for job recruiting and placement purposes, including, if you agreed to the retention of your data in our CVtheque at the time of your application, notification of future job opportunities, and, for successful candidates, for employment purposes.

You will find details on the personal data processed and the purposes for this processing below. Sometimes, these activities are carried out by third parties. We will inform you separately in case your personal data will be made subject to so-called automated decision-making.

If provided to us, we process the following categories of personal data about you:

- identification data, including first name and surname;
- contact information, including home address, phone/mobile/fax number, e-mail address;
- gender, date of birth, citizenship;
- data regarding responses to screening questions (where applicable);
- resume, including education, past work experience and references;
- information on certain health conditions (only where required by law);
- job interview notes;
- assessment results.



Processing of this personal data is required to enable Malt to administer the recruiting process, including the set-up of an electronic job applicant HR file, managing your application, organizing interviews – in short, the processing is necessary for us to entering into a contract with you.

Malt may also process your data for the purpose of conducting surveys on your candidate experience or on diversity and inclusion (gender, age group, educational background). In this case, the data will be processed exclusively for the purpose stated in the survey and we will produce anonymous statistics on the basis of your answers.

Besides, we may process your personal data for our following legitimate interests:

- In case of legal proceedings to establish, exercise or defend us against a legal claim.
- To notify you about future Malt job opportunities.

We will therefore retain your personal data for two years beyond an unsuccessful application. You can object to such use of your personal data (see below at “**What are my rights under applicable data protection laws**”).

Where does Malt obtain my personal data from?

Most of the personal data we process is obtained from you when you file your application with Malt, but we also obtain personal data about you in the course of the application process (for example, during interviews or via job assessments). Other data types may be obtained from third parties, including for example, recruitment agencies or networking platforms where we may hunt you such as LinkedIn.

In that event, Malt will retrieve available information from your LinkedIn account to store it in its applicant tracking system. Additional privacy terms of LinkedIn platform may apply.

Does Malt share personal data with others?

Malt and its subsidiaries

Personal data will only be shared between Malt and, possibly, with its subsidiaries in certain circumstances and where lawful to do so, for example with limited members of the human resources department if they may be interested in your profile or the IT department, both of which may be working for different Malt entities. Whenever we need to share your personal data, we will only do so on a need to know basis and with selected employees for tasks within their job responsibilities. Malt takes



appropriate steps to ensure that such personnel are bound by duties of confidentiality with respect to your personal data.

Your personal data may in particular be shared with :

- *Malt Community GmbH (Allemagne)*
- *Malt Community SL (Espagne)*
- *Malt Community SRL (Belgique)*
- *Malt Community BV (Pays-Bas)*

Service Providers

We use third party service providers (e.g. Lever as applicant tracking system or work/recruitment agencies) who provide technical and support services in connection with the application and recruitment process (such as hosting or “Software as a Service”). In providing the services, your personal data will, where applicable, be processed by the service provider on Malt’s behalf.

We will confirm for any third party that we use that they can provide sufficient guarantees regarding the confidentiality and security of your data. We will ensure that any third party complies with our data security standards and international transfer restrictions.

Disclosure to third parties

In certain circumstances, we share and/or are obliged to share your personal data with third parties outside the Malt Group, for the purposes described above and in accordance with applicable data protection laws. These parties will act as controllers of your personal data in their own right, and they will be responsible for compliance with applicable data protection laws.

These third parties are:

- Applicant tracking system (Lever),
- Hosting services provider (Google Cloud),
- police, public prosecutors where requested following a strict legal process

Does Malt transfer personal data to countries outside the EEA?

No. We do not directly transfer the personal data we process to countries outside the European Economic Area (“EEA”), but our service providers may (this is the case for Lever). In Lever case, we have checked that they guarantee putting in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights, by adhering to the Privacy Shield mechanism.



How is my personal data secured?

We maintain physical, electronic and procedural safeguards to protect the confidentiality, integrity and availability of your personal data. We have in particular taken appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

How long does Malt store my personal data?

If your application for employment is successful and you commence employment with Malt, your personal data will be transferred to your personnel file and will be processed for employment purposes.

If your application for employment is not successful, we will keep your personal data for two years beyond the end of the application process for the purposes of contacting you for future job vacancies.

What are my rights under applicable data protection laws?

You have the right to request access to, correction, or deletion of your personal data, to ask for data portability, as well as to define instructions on your personal data after your death. You are also entitled to object to the processing of your personal data in certain instances. If we process your personal data based on your consent, you may withdraw it for the future at any time. For general questions and queries on privacy or to make a data subject request, please contact us on privacy@malt.com.

Questions and queries

If you would like further information about your data protection rights please contact your hiring Malt entity via privacy@malt.com or via the addresses as listed below. If you have any concern about privacy or want to contact one of our data controllers, please contact us with a thorough description and we will try to resolve the issue for you. You can also lodge a complaint with a supervisory authority.

Changes to this Notice

We may decide to change this Notice. If the change is fundamental or may significantly affect you, we will provide you with the updated Notice in advance of the change actually taking effect. We encourage you to review the content of this Notice regularly.