

Applying for a Role at Hokodo: Candidate Privacy Notice

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We take data privacy seriously and we ensure the highest level of protection and diligence when it comes to the collection, use and retention of the personal data of all candidates applying for a position at Hokodo.

We care about your personal data and want you to be informed about how we use your personal data in the hiring process and the rights you have in relation to your personal data. This statement explains how Hokodo treats the personal information (i.e. information about you as an individual) you submit and we collect through Ashby. It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It also provides you with certain information that must be provided under applicable privacy laws.

This information relates to anyone applying for a role at Hokodo, so please read it through carefully. The data controllers of your personal information are one or more of the member firms of Hokodo Group.

What do we mean by...?

« **Collect** » refers to the collection of personal data.

« **Recipient** » is the natural person, legal entity or organisation that receives the personal data, whether or not they are a third party.

« **Personal data** » refers to any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

« **Hokodo entity** » means any entity over which the group has control.

« **Data subject** » : is the natural person whose data is processed, i.e. within the framework of this policy: visitors to our recruitment sites, candidates (whether or not they have created an account on our recruitment sites) and referees.

« **Controller** » is the natural person, legal entity or organisation which, alone or jointly, determines the objectives and methods for processing personal data.

« **Processing** » : means any operation, or collection of operations applied to personal data, regardless of the process used (e.g. collection, recording, organisation, structuring,

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storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, limitation, deletion or destruction, etc.).

« **Processor** » is the natural person, legal entity or organisation that processes personal data on behalf of a Controller.

Data controller

Hokodo ("we" or the "Company") and its group entities (together the "Group") are "data controllers". This means that we are each responsible for deciding how we hold and use personal data. The specific data controller for your personal data will depend on which recruiting Hokodo entity that employs you (please see the details at [Appendix 1](#) for details of the relevant Hokodo group entity).

What personal data do we collect?

In connection with your application for work with us, we will collect, store, and use the following categories of personal data about you:

- any information you have provided to us in your CV and covering letter;
- the information you have provided by way of an application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications; and
- any information you provide to us during an interview.
- data made public at your initiative (e.g. profiles from professional social network)

Sensitive data

Based on the jurisdiction where you are applying for a role, we may be required to collect such data because of the legal, regulatory, or contractual requirements incumbent upon us and specifically under an agreement or commitment made to regulators or agreed in the context of any kind of litigation.

However, we may collect sensitive data about you if you voluntarily provide us with this data or if we are required to collect this data due to legal, regulatory or contractual requirements and more particularly pursuant to an agreement or commitment made with regulators, or as part of litigation of any kind.

How is your personal data collected?

We collect personal data about candidates from the following sources:

- you, the candidate;
- third party recruitment agencies who may represent you;

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- your named referees, from whom we obtain a standard reference; and
- data from third parties from a publicly accessible source e.g. results of social media searches such as LinkedIn.

How we will use information about you and on what lawful basis

We will use the personal data we collect about you to:

- assess your skills, qualifications, and suitability for the role;
- carry out reference checks;
- communicate with you about the recruitment process;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

Having received your application, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and carry out any other relevant checks before confirming your appointment.

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint candidates to open roles.

We also need to process your personal data to decide whether to enter into a contract of employment or engagement with you and comply with legal obligations relevant to recruitment to which we are subject (such as establishing right to work status).

If you fail to provide personal data

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

How we use particularly sensitive personal data

We will use your particularly sensitive personal data in the following ways:

- We will use information about your health and disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. Data that the Company uses for these purposes will be collected on an anonymised basis. Candidates

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are entirely free to decide whether or not to provide such information and your application will not be affected either way.

Who do we share your personal data with and why?

We ensure that only authorised persons have access to personal data.

Recipients may include:

With Hokodo entity

We may disclose your personal data to members of our People team, the relevant team managers in respect of the role you are applying for in order to make hiring decisions.

With recipients outside the Hokodo Group and processors

It may be necessary from time to time for us to disclose your personal data to third parties or agents, including without limitation to the following:

- third parties or agents of clients to assist in the administration, processing and management of certain activities pertaining to prospective employees including travel and expense management service providers;
- individuals or companies employed by the Company to carry out specific services, functions or consultancy work and other financial institutions;
- regulatory bodies to whom we are obliged or required to disclose information including Workplace Relations Commission, Courts and Court-appointed persons;
- relevant Government departments and agencies; and
- other subcontractors, services providers necessary to support the organisation activity.

As part of our interview process, we may ask for your permission to use a subprocessor to record the interview.

Transfer of personal data outside the EEA

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), for the purposes described above. Due to the global nature of our business, your personal data may be disclosed to members of our group outside the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers who act on our behalf.

We will ensure appropriate safeguards, such as approved standard contractual clauses, are in place to protect the privacy and integrity of such personal data. Please contact us if you would like more information concerning such safeguards.

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Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

How long will you use my information for?

Your personal data will be kept for the period necessary to complete the recruitment process.

Unless you request otherwise, your personal data (name, email, phone number) will be kept in order to study the possibility of offering you other positions that may correspond to your profile for a maximum of two (2) years from your last contact with Hokodo (by email or phone calls).

The results of any tests you are asked to take during the recruitment process are processed separately and will be kept for 12 months after completion.

Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

Request access to your personal data (commonly known as a "data subject access request").

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you.

This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal data.

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).

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Object to processing of your personal data

This enables you to reject the data processing when we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

Request the restriction of processing of your personal data.

This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the relevant data controller using the details in Appendix 1.

You have the rights against an automate decision

As a matter of principle, you have the right not to be subject to a decision based solely on automated processing based on profiling or otherwise that has a legal effect or significantly affects you. However, we may automate such a decision if it is necessary for the entering into or performance of a contract with us, authorised by regulation or if you have given your consent.

In any event, you have the right to challenge the decision, express your views and request the intervention of a competent person to review the decision.

Complaints

You have the right to lodge a complaint with a supervisory authority ([Appendix 2](#)) if you are unhappy with how your personal data is being handled.

Further Information

If you require any further clarification regarding this privacy notice, please contact the Hokodo Legal Department by email at compliance@hokodo.com.

If you've been talking to a member of our People team, they'll also be happy to handle this request.

Appendix 1 - List of Hokodo Group Data Controllers

The specific data controller for you will depend on the Hokodo group entity you eventually employed by. These are as follows:

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Hokodo SAS – 39–41 rue de la Chaussée d’Antin, 75009 Paris, France
Hokodo Services Limited – 35 Kingsland Road Shoreditch, London, E2 8AA, United Kingdom

All controllers can be reached at people.team@hokodo.co

Appendix 2 – Supervisory authorities

France	https://www.cnil.fr
Lithuania	https://vdai.lrv.lt/en/
The United Kingdom	https://ico.org.uk/