

# Alstom Data Privacy Applicant Notice



## Ethics & Compliance Data Privacy

## Alstom Data Privacy Applicant Notice

Alstoms pays due attention to the protection of your personal data i.e the data which permits to identify you directly or indirectly. This Data Privacy Applicant Notice gives you an overall view of the Alstom Group rules and practices with respect to collecting, processing, using, amending, reviewing, recording, storing, disclosing and deleting personal data it collects for recruitment-related purposes.

This Data Privacy Applicant Notice describes Alstom efforts to be compliant with the European General Data Protection Regulation 2016/679 dated April 27, 2016 (EU GDPR) and with any national laws in relation to the protection of personal data.

### Collect and Processing of personal data

Alstom may collect the personal data which are necessary for recruitment-related purposes. The personal data may include the following types of information about you:

- name, surname,
- personal address,
- phone number and e-mail,
- date and place of birth,
- nationality,
- national identification number, passport or ID card number, social security number, national tax number,
- Immigration, right-to-work and residence status,
- bank account details,
- family status and contact details,
- diplomas,
- employment and education history,
- feedback results,
- photos.

Special or sensitive data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, genetic, health, sex life or sexual orientation are not collected except with your express consent.

Alstom processes such personal data to comply with its legal obligation or for transparent legitimate recruitment purposes to :

- assess your competencies for a job position,
- depending upon the results of the assessment, to offer you an employment contract.

The collection, use and transfer of the personal data may be made through automated, electronic and/or paper-based means. No profiling is performed on your personal data without your express consent.

### Disclosures

Alstom may disclose your personal data to an Alstom subsidiary or to a partner, supplier, subcontractor, other third party or an administration to the extent necessary to comply with Alstom's legal obligations or legitimate recruitment interests. Internally, the access to your personal data is limited to the human resources department, the site security department and other departments having a strict need to know. This access is regularly reviewed by E&C Data Privacy to ensure the compliance of the company with its legal obligations.

### **International Transfers**

Your personal data are, as a general rule, processed and stored in the European Union. In cases where they are processed and/or stored outside the European Union appropriate contractual arrangements compliant with Alstom's legal obligations will be implemented as required by law.

### **Accuracy**

Alstom takes reasonable steps to ensure that the personal data provided is recorded in a manner that ensures accuracy and completeness. To help with this activity, you must inform your *Recruiter* of any changes relating to you.

### **Security**

Alstom is committed to the protection of your personal data by protecting them in particular from loss, unauthorized or illegal processing and accidental alteration or destruction. Appropriate technical and organizational measures are in place to protect the information systems and the storage area where your personal data are stored. Alstom requires its services providers, by contractual means to have similar standards.

### **Retention and period of storage**

Your personal data is retained only for the time necessary to achieve the purpose for which it was collected and for any required or permitted period under applicable laws.

### **Applicant's rights**

#### ***Object***

You have right to object to any use or disclosure of your personal data that is not, (i) required by law, or (ii) needed by Alstom for recruitment purposes.

#### ***Access, Rectify and Erase***

You have the right to access your personal data, ask for rectification, and, in certain circumstances, have your personal data erased. Your right to access must be reasonable which means that access to your personal data may be denied (i) in the case of recurrent access requests within a short time interval, or (ii) where providing such access or correction could compromise the privacy of another person or unreasonably expose sensitive company information.

### **How to ask questions and exercise your rights**

If you want to exercise your right, if you have any questions about this Applicant Data Privacy Notice or if you believe that your personal data is not handled in accordance with the applicable law or this Notice, please, send an e-mail to [data.privacy@alstomgroup.com](mailto:data.privacy@alstomgroup.com).

### **Effective date**



V1 – 25 May 2018

### **Drafted by**



Veronique Chapuis-Thuault  
Head of Compliance

### **Approved by**



Michael Julian  
Chief Compliance Officer

**Distribution**

---

**The Alstom Applicant Data Privacy Notice** must be communicated to every applicant to a job position proposed by Alstom.