



FRANÇAIS / FRENCH

NOTE D'INFORMATION CONCERNANT LA PROTECTION DES DONNEES A CARACTERE PERSONNEL DESTINEE AUX CANDIDATS A UN EMPLOI

Date d'entrée en vigueur : janvier 2025

1. Introduction

La présente note d'information s'applique à tous les candidats postulant au programme Graduate & Internship de Carglass SAS et Carglass Services. Il décrit comment Carglass SAS et Carglass Services, en tant que responsables du traitement des données en fonction de l'offre d'emploi proposée, collectent, utilisent, partagent et conservent les informations personnelles que vous fournissez, et vous informent sur vos droits en matière d'accès, de modification et d'utilisation de vos données.

Carglass SAS et Carglass Services s'engagent à protéger les données personnelles reçues et à les traiter conformément aux lois applicables en matière de protection des données, y compris le Règlement Général sur la Protection des Données 2016/679 (UE) (« RGPD »).

Dans cet accord de confidentialité, les termes « nous », « notre » et « nos » font référence à Carglass SAS et Carglass Services.

2. Qui sommes-nous ?

Carglass SAS est une Société par Actions Simplifiée, immatriculée au registre du commerce et des sociétés de Nanterre sous le numéro 425 050 556 et dont le siège social est situé 107, Boulevard de la Mission Marchand – 92411 Courbevoie Cedex.

Carglass Services est une Société par Actions Simplifiée, immatriculée au Registre du Commerce et des Sociétés de Nanterre sous le numéro 824 515 019 et dont le siège social est situé 107, Boulevard de la Mission Marchand – 92411 Courbevoie Cedex.

Ces deux sociétés sont collectivement appelées ci-après "Carglass France"

Amberjack Global Ltd agit en tant que sous-traitant des données et fournit des services de recrutement, y compris via sa plateforme « Ambertrack ».

3. Quelles données personnelles collectons-nous ?

Les « données personnelles » désignent toute information vous concernant. Carglass France collecte et utilise les catégories suivantes de données personnelles des candidats :

- **Coordonnées personnelles** : adresse, numéro de téléphone, adresse e-mail, identifiants de réseaux sociaux.
- **Données de recrutement** : CV, niveau d'éducation, résultats d'examens, diplômes, lettre de motivation, entretiens, évaluations, tests psychométriques, commentaires et feedbacks.
- **Détails personnels** : nom, date et lieu de naissance, nationalité, situation familiale, permis de travail, carte d'identité/passeport, numéro de sécurité sociale, permis de conduire.
- **Données professionnelles** : expérience, formation interne, horaires de travail, absences, évaluations de performance, gestion des talents, récompenses et distinctions.

4. Pourquoi collectons-nous vos données et sur quelle base légale ?

Nous traitons vos données pour plusieurs raisons liées au recrutement, avec une base légale spécifique pour chaque traitement.

Finalité du traitement	Base légale
Gestion du processus de recrutement (évaluation de votre candidature, gestion des entretiens, offre d'emploi)	Exécution d'un contrat, obligation légale, intérêts légitimes de Carglass France
Communication avec vous et les employés de Carglass France, y compris pour de futures opportunités	Intérêts légitimes de Carglass France

Lorsque nous invoquons l'**intérêt légitime**, nous veillons à ce qu'il soit équilibré avec vos droits et libertés en matière de protection des données.

5. Avec qui partageons-nous vos données ?

- **Sociétés affiliées** : Carglass SAS et Carglass Services font partie du groupe Belron® et peuvent partager certaines données avec d'autres entités du groupe.
- **Autorités et régulateurs** : Si nécessaire, nous pouvons transférer des données aux autorités fiscales, judiciaires et réglementaires, ainsi qu'à des conseillers externes (avocats, auditeurs).
- **Sous-traitants** : Amberjack Global Ltd agit en tant que sous-traitant et traite les données conformément à nos instructions contractuelles.

6. Durée de conservation des données

- **Candidats non retenus** :
 - **2 ans** en base active (si consentement donné).
 - **Suppression immédiate** après la fin du recrutement si aucun consentement.

- **5 ans** en base archivage (à compter du dernier entretien, pour des raisons légales).
 - **Candidats recrutés** : conservation des données **5 ans après la fin du contrat de travail**.
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7. Transferts internationaux

Toutes les données sont traitées au sein de l'**UE et du Royaume-Uni**. La Commission européenne a jugé que le Royaume-Uni offre un niveau de protection adéquat.

8. Vos droits

Vous avez plusieurs droits concernant vos données personnelles :

- **Droit d'accès** : Obtenir une copie de vos données et des informations sur leur traitement.
 - **Droit de rectification** : Corriger des données inexacts ou incomplètes.
 - **Droit à l'effacement** : Demander la suppression de vos données sous certaines conditions.
 - **Droit à la limitation du traitement** : Restreindre l'utilisation de vos données dans certains cas.
 - **Droit à la portabilité** : Recevoir vos données dans un format structuré et transférable.
 - **Droit d'opposition** : S'opposer à certains traitements basés sur l'intérêt légitime.
 - **Droit de retirer votre consentement** : Retirer votre consentement à tout moment lorsque le traitement repose sur celui-ci.
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9. Contact

Pour toute question sur cet avis ou sur l'utilisation de vos données, contactez notre Délégué à la Protection des Données (DPO) : **dpo@carglass.fr**

10. Réclamations

Si vous estimez que nous ne respectons pas vos droits, vous pouvez déposer une plainte auprès de la **CNIL** :

- **En ligne** : via le service de plainte en ligne ou le service « Besoin d'aide ».
- **Par courrier** : CNIL – Service des Plaintes – 3 Place de Fontenoy – TSA 80715 – 75334 Paris CEDEX 07.



ANGLAIS / ENGLISH

Privacy Notice: Applicants

Effective date: January 2025

1 Introduction

This Privacy Notice applies to all job applicants for the Graduate & Internship Programme at Carglass Services France SAS®. This notice describes how Carglass Services France SAS®, as a data controller, collects, uses, shares, and retains the personal information you provide and informs you about your choices regarding use, access and correction of your personal information. Carglass France SAS® is committed to ensuring that any personal data it receives is protected and handled in accordance with applicable data protection laws including the General Data Protection Regulation 2016/679 (EU) ("GDPR").

For the purposes of this Privacy Notice, references to "we", "us" or "our" shall refer to Carglass Services France SAS®

2 Who we are

Carglass Services France SAS® ("Carglass France") is a company incorporated in France whose principal place of business is 107, Boulevard de la Mission Marchand – 92 400 Courbevoie.

Amberjack Global Ltd, acting as our data processor, provides us with recruitment services including the use of their platform called "Ambertrack" and supports us with certain recruitment activities.

3 What personal information we process about you

"Personal data" means any information relating to you. Carglass Services France SAS® will collect and use the following categories and types of personal data about you, which we call **Applicant Data**:

- **Personal Contact Information** including physical home address, personal phone and mobile numbers, personal email addresses and personal social media identifiers.
- **Recruitment data** including CV, educational level, exam results and grades, educational degree/date of graduation, backgrounds checks and associated cover letters and correspondence, interviews and assessments data, psychometric tests data, data related to reviews, survey responses and comments/feedbacks.
- **Personal details** including name, date and place of birth, nationality, geographic location, entitlement to work in a given jurisdiction and copies of right to work documentation, family situation/marital status, children, copy of the identity card/passport, social security number, driver's license number, citizenship information, visa information, other government issued ID number, membership information, communications contents, images and video.
- **Job data Employment history**, probation period, seniority and professional skills and experience, data

gathered from internal training, training record Employment details, working hours, office location and time zone, work schedule and status, attendance and periods of leave, performance assessment and appraisal data, talent management and development details, award information, feedback

4 Why we collect your personal information and the lawful basis for processing

We collect and use Applicant Data for a variety of reasons linked to processing your application for a role with us (the "**Processing Purposes**"). However, we can only collect and use this data if we have a valid lawful basis for doing so, and we are required to explain the various lawful bases that we rely on to you.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we use your information. Please contact us if you need details about the specific legal ground, we are relying on to process your personal information where more than one ground has been set out in the table below.

Below are the Processing Purposes and corresponding Legal Basis for **Applicant Data**:

Processing Purposes	Legal Basis
<p>1. Recruitment Process Management that includes:</p> <ul style="list-style-type: none"> a) Administering and processing your application (including processing a job offer should you be successful) b) Determining your eligibility for the role you applied for c) Conducting background checks as part of your application. d) Managing the recruitment for successful candidates 	<ul style="list-style-type: none"> • Necessary for performing a contract with you as the data subject; • Compliance with legal obligations <p>Legitimate interests of Carglass Services France SAS®.</p>
<ul style="list-style-type: none"> • 2. Communicating with you, Carglass Services France SAS®. employees and third parties, including informing you of future opportunities with Carglass Services France SAS®. 	<ul style="list-style-type: none"> • Legitimate interests of Carglass Services France SAS®.

When we rely on legitimate interests as one of legal grounds to process your data, this may include:

- Assessing your suitability for employment/engagement with Carglass Services France SAS®;
- Prevention of fraud, misuse of company IT systems, or money laundering;
- Physical security, IT and network security;

When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

5 Who we are sharing your data with

- **Belron Overseas Offices.** As Carglass Services France SAS®. is part of a wider group with offices located across the globe, which all partially share management, human resources, legal,

compliance, finance and audit responsibility, Carglass Services France SAS® may transfer the Applicant Data to, or otherwise allow access to such data by other entities within Belron.

- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent external advisors (e.g., auditors, law firms), insurance providers, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Data processors.** Amberjack Global Ltd acts as a data processor on behalf of Belron. All activities carried out by Amberjack are subject to contractual obligations or instructions provided by us.

6 How long we keep your data

If you are unsuccessful in your application, we will keep your details for 2 years in the active database from the last contact with the candidate, provided the candidate has given consent for inclusion in the CV database. Immediate deletion after the recruitment period if the candidate has not given consent for inclusion in the CV database. And 5 years in the archived database from the date of the candidate's last interview (for legal purposes).

If you are successful in your application, we will keep your Application Data for two years from the end of your employment with us.

7 International transfers

All your personal data will be processed within the EU and UK. There is an adequacy decision by the European Commission in respect of the UK. This means that this country is deemed to provide an adequate level of protection for your personal data.

8 Your rights

You have certain rights as an individual which you can exercise in relation to the information we hold about you. If you make a request to exercise any of your rights we reserve the right to ask you for a proof of your identity. We aim to acknowledge your request as soon as possible.

You have the following rights:

The right to access

You are entitled to a confirmation whether we are processing your data, a copy of your data, and information about purposes of processing, who do we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, where we got your data from and how you can make a complaint.

The right to rectification

If you believe the personal information we hold about you is inaccurate or incomplete you can request for it to be rectified.

The right to erasure

If you withdraw your consent, terminate a contract with us or you believe the personal information is no longer necessary for the purposes for which it was collected, you may request your data to be deleted. However, this will need to be balanced against other factors, for example there may be certain regulatory obligations which mean we cannot comply with your request.

The right to restriction of processing

You can ask us to restrict (i.e. keep but not use) your personal data, but only where:

- Its accuracy is contested, to allow us to verify its accuracy; or
- The processing is unlawful, but you do not want it erased; or
- It is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- You have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal data following a request for restriction, where we have your consent; to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.

The right to data portability

If we collected your information under a contract or your consent, you can request from us to transfer your personal information to provide it to another third party of your choice.

The right to object

You have the right to object at any time to processing of your personal data where the processing is necessary for the purposes of the legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms.

The right to withdraw consent

If we process your personal information under your consent, you can withdraw it any time.

9 Contact details

If you have any questions relating to this notice or use of your personal information in the recruitment process, please contact our Privacy Officer:

Email: dpo@carglass.fr:

10 Complaints

If you are not satisfied with our response or believe we are not processing your personal data in accordance with legal requirements you can make a complaint on the CNIL.

On the CNIL website

- in certain specific cases, via [the online complaint teleservice](#)
- in “other cases” not provided for by the teleservice, via the ‘Need help’ service, which will allow you to access the complaint form at the bottom of a question response.

By post by writing to: CNIL - Service des Plaintes - **3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.**

