



## **BNPP Privacy Notice for Recruitment**

10.09.2020

At BNP Paribas S.A. Paris Sucursala Bucuresti (hereinafter referred to as "BNPP") we recognise that privacy is important and are committed to follow the highest standards of personal data processing under Romania and European legislation. We have developed this Privacy Notice to inform you of how BNPP will use the information you submit to BNPP through e-mail, or in any other way as part of a job application or job search process.

When reading this Privacy Notice, please keep in mind that "Personal Data" (in this Notice also referred to as "Data" or "your Data") means any information or set of information from which we are able, directly or indirectly, to personally identify you, in particular by reference to an identifier, e.g. name and surname, email address, phone number, etc.

When this Privacy Notice mentions "we," "us," or the "Company," it refers to the controller of your Personal Data under this Notice, namely BNP Paribas S.A. Paris Sucursala Bucuresti, address 46D-46E-48 Pipera Street, Oregon Park, Building C, 6th Floor, District 2, Bucharest, which may be interested in offering you a job position or which otherwise decides which of your Data are collected and how they are used.

In compliance with applicable data protection laws in Romania, we request from you to take some time to read this Notice in full and acknowledge your understanding of the information herein, in order to be able to proceed with submitting your job application with BNPP. Regarding the collection and processing of certain types of your Data, your express consent may be also required, as further described in this Privacy Notice.

### **WHAT TYPES OF DATA WE WILL PROCESS**

The Privacy Notice concerns all Data that you decide to or are requested to submit in relation to your application for a particular job position, including the following:

- a. Identification Data: Name, email address, telephone number, or other contact information;
- b. Job Application Data: CV, cover letter, previous work experience, education, additional qualification, or other information regarding your professional qualification and experience, additional skills and abilities, professional interest, etc. you provide for our consideration in the recruitment process;
- c. Pre-employment checks: interview notes, records/results of pre-employment checks, information included on the candidate's CV/resume and/or any application forms.
- d. Image: We do not require from job candidates to include photos as part of the job application documentation. It is up to you if you would like to voluntarily submit such Data;
- e. Identification of the Job and Personal Requirements: Type of employment sought, desired salary, willingness to relocate, or other job preferences you decide to voluntarily submit;



- f. Referees: Reference letters, names and contact information for referees.

**NOTE:** If you decide to attach reference letters to your job application, it is your responsibility to obtain consent from referees and inform them of the purposes for which their Data may be processed by us (based on this Privacy Notice) before providing their personal information to us.

We will not contact directly your referees, unless you explicitly consent to such approach here:

*I agree to have the referees provided in my CV being contacted by BNPP in relation to the recruitment process with BNPP for which I have applied.* Yes No

**We do not require from job candidates to include any Special Categories of Data** (racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning sex life or sexual orientation) **as part of the job application documentation. Please do not include such Data.**

and

- g. Any other information that you decide to voluntarily share: hobbies, interests, professional plans, how you found about the job offer, what motivates you to apply for us, marital status, salary level, etc.

You can choose what types of information to submit as part of your job application. Normally, the information in letters: a), b), c) and e) would be strictly necessary to be provided, so we can consider your job application for the particular position. Thus, if you decide not to provide such Data, we may be prevented from further processing your application.

In certain cases, the Job Announcement may specify additional categories of Data required for the particular position (see p. f) and g) above). If so, provision of such information would be also treated as mandatory (please check your Job Announcement again).

Submitting of any other information would be dependent entirely on you and would be treated as voluntary.

Note, that in case of your selection for the job position you have applied for, the above categories of Data will further form part of your employment file (dossier) with BNPP (more information will be provided upon the start of your employment).

[Further in the process or during interviews, we may ask for your consent before we obtain additional information from third parties (e.g. former employers for references provided by the national law, etc.) or will, where required by law, notify you that we obtained such data from those third parties.]

#### **PURPOSES OF PROCESSING**

Any Data provided by you in the recruitment procedure will be processed only for the purposes of reviewing and assessing your eligibility as a job candidate for the particular job position as well as for the purposes of our legal and internal compliance, namely:



- To assess your skills, qualifications and interests against our career opportunities, to maintain our relationship during the recruitment process, including by calling you and inviting you to interviews, exchange of offers and terms of employment, etc.;
- To verify your information, to run our internal compliance and conflict checks and to conduct reference/background checks (if required under law or subject to your explicit consent);
- To communicate with you and inform you of other career opportunities (if we have your consent to include you as part of our talents data base, see below);
- For security and protection of our organization, IT networks and Company information;
- To improve our recruitment process; and
- Legal defense as necessary – to defend ourselves in any legal or court proceedings;

**If in future we would need to process your personal data for a purpose other than the above we will provide you with information on that purpose and any other relevant information. Where necessary, we may seek for your consent before processing your Data for other purposes.**

Note, that in case of your selection for the job position you have applied for, the above categories of Data will be further processed for employment purposes (more information will be provided upon the start of your employment).

#### **LEGAL BASES FOR PROCESSING OF YOUR DATA**

In order to be able to process your Data in our recruitment campaigns, we rely on different legal bases, including:

- Your consent to BNPP to process all Data provided in your CV and related documents, which you have given us by deciding to apply to our job offer and submit your CV and related documents, after reading this Privacy Notice; and/or
- The necessity to establish a contractual relationship with you or to take steps in this direction, at your request; and/or
- The necessity for us to comply with legal obligations related to recruitment campaigns and/or our regulated type of business activity; and/or
- The necessity to pursue our legitimate interests, including:
  - To ensure that our organization, IT networks and information are secure;
  - To administer and generally conduct business within the Company and across BNPP; and
  - To protect our interest and rights in event of investigated, suspected or actual violations of law.
- Your specific consent (only when legally required or permitted).



**NOTE:** If we rely on your consent as a legal basis for processing your Data, you may withdraw your consent at any time by submitting a Withdrawal Request to the following e-mail [ro.hr.info.gdpr@bnpparibas.com](mailto:ro.hr.info.gdpr@bnpparibas.com) or directly contacting our Data Protection Officer (see section CONTACT US). As of the receipt of your Withdrawal, any Data to which the Withdrawal refers would be deleted from our files and records.

## BACKGROUND CHECKS

Considering the business activity of the Company, for certain position we may need to conduct additional background checks to meet statutory and internal compliance and conflict of interest procedures and verify your eligibility to work at BNPP.

In this regard, we may collect additional data about you from social media platforms where you maintain an open profile. This would mainly include professional social networks (e.g. LinkedIn, etc.) but to the extent relevant for the applied job position.

## AUTOMATED DECISION MAKING

**We do not apply Automated Decision Making, including profiling, to job candidates in the recruitment process.**

## HOW LONG WILL WE KEEP YOUR DATA

We would like to keep you Data until our open job position is filled. We can not estimate the exact time period for completion of a recruitment campaign, but we consider this period would not extend over 3 months and will be over when a candidate accepts our job offer for the position for which we are considering you.

When that period is over, we will delete all your Data submitted in the recruitment process, unless you give us your consent to keep your Data in our database for future recruitment campaigns. In the latter case, please review and complete the consent form here:

*I give my consent to BNPP in order to process my personal data in regard with future recruitment campaigns, for a maximum period of 6 months after concluding the present recruitment procedure:*

Yes  No

Note, that in case you are selected for the job position you have applied for, the above categories of Data will continue being processed as part of your employment file (dossier) with BNPP. The ground for such processing is legitimate interest of BNPP to have your employment file completed with your CV and other Data obtained during the recruitment process (more information will be provided upon the start of your employment).

## YOUR RIGHTS AS A DATA SUBJECT

In relation to your Data submitted for recruitment purposes, you have the right to request from the Company access to, rectification and/or erasure of the Data or certain categories thereof or restriction of processing as well as the right to data portability.



You also have the right to object at any time, on reasons relating to the particular situation, to processing of any category of your Data which we ground on our legitimate interest (see section LEGAL BASES FOR PROCESSING OF YOUR DATA above). In such case we will no longer process this Data unless we can demonstrate to you a compelling legitimate grounds which may ground such further processing.

For the exercise of your rights in accordance with the General Data Protection Regulation (EU) 2016/679, you can submit a written, dated and signed request at the following address: 46D-46E-48 Pipera Street, Oregon Park, Building C, 6th Floor, District 2, Bucharest, and/or via e-mail at: [ro.hr.info.gdpr@bnpparibas.com](mailto:ro.hr.info.gdpr@bnpparibas.com)

Your request will be reviewed and you will receive an answer within 30 days in accordance with the General Data Protection Regulation (EU) 2016/679.

For further information on data subject's rights, please refer to our Privacy Policy, accessible here [[https://group.bnpparibas/uploads/file/bnpparibas\\_personal\\_data\\_privacy\\_charter.pdf](https://group.bnpparibas/uploads/file/bnpparibas_personal_data_privacy_charter.pdf)].

## ACCESS AND DISCLOSURE OF YOUR DATA

BNPP Human Resources (and relevant recruiting managers) will have access to your Data for the purposes listed above. Where third parties (such as external recruiters) are involved in the recruitment process they will have access on a Need-to-Know basis and will be bound by terms of confidentiality and this Privacy Notice.

In view of the activity of the Company and our pertinence to the corporate group of BNPP, certain Data collected by us in the recruitment process, may be disclosed to other members of the BNPP group, to contractual partners (service providers, such as recruitment agency, IT service providers) working on behalf of the Company or the BNPP group, as well as to be transferred from Romania to other countries, including outside of EU, where needed for the purpose.

In this regard, BNPP has taken adequate safeguards, pursuant to the legal provisions, to ensure that these third parties, referred also as "Data Processor/s" comply with their obligations regarding the protection of your Data and have also implemented adequate technical and organizational measures to safeguard your Data. The Data Processor/s have the same obligations to protect your personal data in accordance with the General Data Protection Regulation (EU) 2016/679, as we do.

## TRANSFER OF YOUR DATA

Any transfers of your Data to the Data Processors referred above will be conducted only after complying with the safety and other regulatory requirements imposed by the Romanian and European legislation. Where non-EU jurisdictions are not cleared by adequacy decisions of the European Commission, transfers thereto would be conducted only based on implemented Standard Contractual Clauses, approved by the European Commission (available at: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en))

I give my consent to BNPP for personal data transfers to third countries (non-EU), as described above:  Yes  No



**HOW WILL WE SECURE YOUR DATA?**

We recognize our responsibility to protect the information you provide to us. BNPP takes appropriate technical, organizational, and legal steps to protect job application information, including secure servers, firewalls, and encryption of application data. For further information on our security measures, please refer to our Privacy Policy, accessible here [\[https://group.bnpparibas/uploads/file/bnpparibas\\_personal\\_data\\_privacy\\_charter.pdf\]](https://group.bnpparibas/uploads/file/bnpparibas_personal_data_privacy_charter.pdf).

**CONTACT US**

Please feel free to ask us questions concerning our Privacy Notice, request a copy of your Data or to access, delete, correct or update your Data or withdraw your consent for processing of your personal Data or certain categories of data (see above) or if you want to address any safety and security related requests, to our Data Protection Officer at the address below:

BNP Paribas SA Sucursala Bucuresti, 46D-46E-48 Pipera Street, Oregon Park, Building C, 6th Floor, District 2, Bucharest, Romania,

E-mail address: [ro.cib.gdpr@bnpparibas.com](mailto:ro.cib.gdpr@bnpparibas.com) and [ro.hr.info.gdpr@bnpparibas.com](mailto:ro.hr.info.gdpr@bnpparibas.com),

Telephone number +40 21 401 17 00

**COMPLAINS TO LOCAL AUTHORITIES**

You also have the right to make a complaint to the national supervisory authority for personal data processing or to take legal action as provided by the General Data Protection Regulation (EU) 2016/679.

Thus, if you are not satisfied by the way we process your Data or the response received by us on any request from your side, you have the right to lodge a formal complaint with the [National Supervisory Authority for Personal Data Processing]. Full details regarding the language requirements and the form of the complaint may be accessed on the complaints section of the NSAPDP's website: [https://www.dataprotection.ro/index.jsp?page=Modele\\_de\\_plangere](https://www.dataprotection.ro/index.jsp?page=Modele_de_plangere) and the contact details for submission of a complaint are as follows:

CONTACT INFORMATION: NATIONAL SUPERVISORY AUTHORITY FOR PERSONAL DATA PROCESSING (NSAPDP) ADDRESS: 28-30 G-RAL GHEORGHE MAGHERU BLD. DISTRICT 1, POSTAL CODE 010336, BUCHAREST, ROMANIA,

E-MAIL: [ANSPDCP@DATAPROTECTION.RO](mailto:ANSPDCP@DATAPROTECTION.RO);

PHONE: +40.318.059.211; FAX +40.318.059.602;

*I confirm that I have read and understood the above Privacy Notice as well as the rights which I have with respect to the processing of my Data during and for the purposes of the recruitment process with BNPP under Romanian and European legislation. Where I have given separate consents for the processing of certain categories of Data in the above Privacy Notice, I confirm that my consents are*



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*freely given, specific, informed and unambiguous and I am fully aware that I can withdraw my consents at any time and following a simple procedure as determined in this Privacy Notice.*

Yes No

**[SUBMIT button]**