

PRIVACY POLICY OF THE JOBTEASER SERVICE

08/12/2023

We wish to answer any questions you may have regarding the processing of your personal data. The purpose of this Privacy Policy is to inform you of the measures we have taken to ensure the highest possible level of privacy and protection of your personal data.

It is intended to inform you about the processing and management of any personal data you provide us with, the reasons why we collect it and how we ensure its security.

This Privacy Policy has been drafted in accordance with the applicable data protection regulations. In order to provide you with the utmost transparency and protection, we have included provisions that fully align with the principles established by the General Data Protection Regulation No. 2016/679 of April 27, 2016, which came into effect on May 25, 2018.

For any inquiries regarding this Privacy Policy, you can contact our Data Protection Officer at the following address: dataprotection@jobteaser.com.

1. General overview

JobTeaser sits in the center of an integrated ecosystem dedicated to guidance and professional development, where three stakeholders interact:

- *Students and graduates;*
- *Our partner schools and universities;*
- *Our partner companies.*

JobTeaser defines the purpose and the means of the processing related to the use of the platform by the Users.

JobTeaser ("We") is a limited company ("société anonyme"), the registered office of which is at 19 rue Blanche, 75009 Paris, France, registered with the Paris Trade and Companies Register under the number RCS 508 271 715.

As part of the JobTeaser Service that we offer through the website <https://www.jobteaser.com> or its subdomains, we act as the 'data controller' (as defined by data protection regulations) for the personal data you provide to us when using this Service.

JobTeaser provides an integrated ecosystem dedicated to the professional integration of students and graduates who are registered in the Service. This Service can also be directly accessed within partner higher education institutions (the 'Institutions') equipped with the JobTeaser Career Center, offering exclusive content and additional features.

Companies are the data controllers for the data processed in the context of their recruitment procedures and recruitment events. They naturally receive data from JobTeaser, particularly concerning candidates who apply for their job offers.

JobTeaser also offers various career guidance modules, including tools and exercises that help users better understand themselves and develop the skills needed for lifelong career development.

2. Scope of this Privacy Policy

Our Privacy Policy applies to any User of our Service.

JobTeaser offers several categories of user accounts, each associated with specific services.

This Privacy Policy applies to the personal data we collect from Members, Recruiters, and Administrators. These Users are defined in the applicable Terms of Use to which this Privacy Policy is attached.

This Privacy Policy also applies to data that we collect from Users of the Guidance Modules.

3. Type of data collected

We may collect personal data about you, such as your identity, your professional profile and technical logs.

For the optimal running of the Service, we will ask you for some personal data. We may also process data about you provided by our partner companies and institutions or from third data sources, such as publicly available data.

When collecting this personal data, we will inform you of mandatory data using an asterisk (*). All other data is purely optional.

Personal data we collect is data that personally identifies you such as information in relation to:

- your identity : surname(s), first name(s), email address(es), address, telephone numbers, age group, gender, etc;
- your professional profile:
 - for students and graduates: higher education institution attended, educational level, graduation year, CV, desired position, job opportunities for which you have applied, your profile and your search criteria, career events for which you have registered, test results from Guidance and Learning Modules, etc.
 - for Recruiters: the data of the company you represent, your professional address and telephone number(s), the profiles you are looking for, your position;
 - for Administrators of Institutions: the name of the Institution you represent, your position;

In addition, we will also collect the computer logs of your connection to our website (IP address, date and time of connection).

4. Purposes of data processing

As Data Controller, we may collect and process your data for specific and legitimate purposes, as part of our overall mission to support students and graduates in their professional guidance and development.

We have lawful bases to process data. Lawful bases include consent (where you have given consent), contract where processing is necessary for the performance of a contract with you (e.g., to deliver JobTeaser Services you have requested), legitimate interests and compliance with the legal obligations to which JobTeaser is subject.

The personal data you provide to us is processed in order to:

- for student or graduate Members: facilitate your professional development using our Service. This includes the ability to :
 - apply for Job opportunities,
 - to register for recruitment or guidance events,
 - be visible to Recruiters according to the features offered by the tool,
 - receive automatic, customised email alerts about job opportunities and career events that meet your criteria as well as advice or information to support your professional guidance and development,
 - use Insights Module by sharing feedbacks about your professional experiences and interacting with other Members;
 - use Guidance and Learning Modules.

Our legal basis for this processing is the **performance of the contract** we have with you when you register to use the Service and, for some features, your **consent**;

- for Administrators of the Institution: support the students and graduates of your Institution in their professional development efforts. Our legal basis for this processing is the **performance of the contract** we have with the Institution you represent;
- for Recruiters: promote your company and publish job opportunities as well as receive promotional information from an Institution or from JobTeaser. Our legal basis for this processing is the **performance of the contract** we have with the Company you represent;
- in general: assure the cybersecurity of the platform and contribute to a data pool used to report on the use of the Service (i.e. statistics) in order to develop new features. Our legal basis for this processing is our **legitimate interests** to ensure our Services are secured, optimised and continue to evolve for the benefit of our Users;
- to comply with our **legal and financial obligations**.

5. Recipients of the data

We may share your data with our authorised staff and our subsidiaries. We also use external service providers to whom we may share some of your data. In addition, depending on the services used, your data may be shared with Recruiters, Members and Institutions and their Administrators. Finally, we may need to share your data when it's required by law or for security reasons.

The personal data provided may be viewed by our employees, any subsidiaries of JobTeaser, competent authorities, or any sub-contractors of JobTeaser, strictly in accordance with the purposes described in Article 4 above, with non-disclosure agreements, and on a strict 'need-to-know' basis.

To allow the registration and effective support of the students and graduates of an Institution as part of their professional development efforts, the Institution may be required to provide us with some limited personal data if the Institution wishes to set up a "single sign on"(SSO) authentication system. SSO allows us to pre-fill the registration form or to update Members data within the Career Center. When a Member account is actually created, the student or graduate communicates his/her data directly to us by confirming or modifying it.

Regarding the SSO (Single Sign-On) and pre-registration features, students have the option to object to the transfer of their personal data to JobTeaser with their institution.

The Service is also used by Recruiters and Administrators as part of their professional activity. Transfers of data are stipulated to be necessary for the satisfactory operation of the service subscribed to by their respective employers.

In addition, to participate in the ecosystem of the JobTeaser Service and to guarantee you the best possible service, you are hereby informed that your personal data may be forwarded to different parties involved in the JobTeaser Service, namely:

Data subjects	Recipients
Members	<ul style="list-style-type: none"> ● Recruiters, as regards personal data about Members who apply for their job opportunities or career events, or who have chosen to upload their profile and CV on the Service. ● Institution Partner Recruiter, as regards Members' CVs, in case the Talentbank Module is activated by the Institution. ● Authorized Administrators of the Institutions, for personal information and activity on the Career Center of the Institution's student and graduate Members. Members who do not wish to authorise the transmission of their data to their Institution but wish to still benefit from the JobTeaser Service, can simply open a Member account directly on our public website www.jobteaser.com rather than through the Career Center of their Institution. In this case, they will have access to all content on our public website www.jobteaser.com or mobile application but will lose access to the exclusive content available on their Institution's Career Center. ● Other Members, based on content published via the Experiences Module.
Recruiters	<ul style="list-style-type: none"> ● Members, based on content published by Recruiters. ● Authorized Administrators of the Institutions, for personal information of Recruiters.
Administrators of	<ul style="list-style-type: none"> ● Members, based on content published by Administrators via Modules

the Institutions	<ul style="list-style-type: none">activated on the Career Center, such as Appointment and Event Modules.Other authorized Administrators, based on Modules activated within the Career Center..
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6. Transfers outside European Union

The data on the platform is hosted within the European Union. In the event that your data is transferred outside the European Union, we take appropriate safeguards.

Where data transfers take place outside the European Union, safeguards are taken: either providers are located in a country whose level of protection has been declared adequate by the European Commission, or standard contractual clauses approved by the European Commission have been signed with these recipients. We may also put in place any other guarantee that complies with data protection regulation that constitutes an "appropriate guarantee" within the meaning of the GDPR.

7. Storage period

Data will be stored until the User closes his account or for a maximum of two years following the last connection to the Service. Data will be then irremediably anonymised.

As part of the service we offer, we are required to store the content that Users publish on JobTeaser, regardless of whether this is as Members, Administrators or Recruiters. As legislation requires us to do, we will store the identification data of the persons publishing such content (IP address, date and time of connection, pages viewed etc.) for a period of one year.

Your personal information will not be stored beyond the period strictly necessary, i.e. for the whole period of use of our services via your account up to the closure of your account. You can instantly close your account by yourself by clicking on the link which can be found in the "My Account" menu on the Service.

Users are informed that their personal data will be stored for a maximum of two years following their last connection to the Service.

We will contact you at the e-mail address or addresses you have provided both a few weeks before the end of that two year period as well as on the day of termination to enquire whether you wish to keep or delete your account.

At the end of those timeframes and following the effective closure of your account, your data will be irremediably anonymised. It will then be used exclusively for statistical purposes (analysis of the frequency of use of the Service's features, statistical analyses of applications in response to published offers etc.).

As regards the data of deceased persons, subject to JobTeaser being informed, that account will be closed and their data permanently anonymised, unless JobTeaser is given any other specific instruction.

8. Security and privacy

We put in place organisational and technical measures to ensure the security and confidentiality of your data.

We have taken all appropriate organisational and technical measures and all necessary precautions to preserve the security of the information described above, in particular from accidental loss, distortion, alteration and

unauthorised access, use, modification and disclosure. We will ensure the integrity and availability of the data we are required to process at all times.

At a technical level, a set of strict, appropriate technical procedures and devices allow us to:

- ensure restricted access to data through access control and strict authentication processes;
- prevent cases of data piracy;
- implement an effective encryption of the data, in particular during its transmission through the use of SSL encryption;
- guarantee the physical security of the information processed.

The information is stored on secure servers.

Finally, we incorporate the protection of personal data throughout the internal organisation of JobTeaser. Clauses to ensure the effective protection of the personal data to which they may have access are written into the employment contracts of employees, and a charter, which strictly regulates the use of the resources of JobTeaser's information system, is appended to our company rules and regulations.

9. Terms and exercise of rights

You have rights over your personal data, such as a right to access and correct your personal information. You can exercise all your rights by contacting our Data Protection Officer: dataprotection@jobteaser.com.

In accordance with data protection regulation, you have a right to access, correct, and delete your personal information, as well as data portability. You also have the right to object to the processing of your personal data, unless the data controller has legitimate grounds for processing the data. You have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing of your personal data based on your consent and carried out prior to the withdrawal of your consent. You have the right to define general or specific guidance for the storage, erasure and communication of your personal data after your death.;

If your request concerns personal data processed by your Institution or data which you have decided to send to Recruiters via JobTeaser (CV, etc.) - as part of an application, for example - please contact them directly according to the methods stipulated by that Institution or those Recruiters regarding the collection or the use of your data. If your request concerns data collected or processed by JobTeaser, you can exercise your rights by writing to us at JobTeaser, 19 rue Blanche, 75009, Paris, France, stipulating "Data Protection" in the letter subject, or by emailing dataprotection@jobteaser.com.

Where required by law, we will then ask you for proof of identity to ensure that you are the owner of the data concerned in the request.

We will do our best to answer your queries regarding the processing of your personal data. If you are not satisfied with the responses provided, you may, if you wish, make a complaint to the CNIL (French Data Protection Authority) according to the terms stipulated on its website (<https://www.cnil.fr>) or the competent Data Protection Authority in your country.

In addition, we would also like to inform you that you are required to comply with the Data Protection Regulation, the breach of which is liable to criminal penalties. In the case where, for example, you wish to send us personal information on behalf of a third party, you will have to act in accordance with the law as regards such data.

In particular, you must refrain from any collection, misuse and, in general, from any act likely to infringe privacy or personal reputation as regards the personal information to which you have access.

10. Amendment of this Privacy Policy

Any changes to the Privacy Policy apply from its date of entry into force. We will, of course, inform you of any substantial changes.

We reserve the right to amend or to update this Privacy Policy. If we make substantial changes to the content of this Privacy Policy, those changes will be announced via a notice visibly displayed on the Service or by other means, such as the email address you provided at the time of your registration, to provide you the opportunity to review the changes before they become effective. If you object to any changes, you may close your account.

You acknowledge that your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy, as of its effective date.

11. Use of cookies

For more information about cookies, please consult our [Privacy Policy](http://www.jobteaser.com/PrivacyPolicy) on www.jobteaser.com

12. Joint controller agreement entered into between JobTeaser and a Partner Institution

Where a joint controller agreement has been concluded between JobTeaser and a Partner Institution, they are joint controllers within the meaning of Article 26 of the GDPR when they use the following Career Center functionalities and process personal data on this occasion:

- Member pre-registration ;
- Member registration (SSO) ;
- Exclusive content ("Private Ads and events") ;
- Appointment ;
- Talent Bank ;
- Insights ;
- Virtual Career Fair ;
- Email campaigns/newsletter;
- Learning Module.

Modules/ functionalities	Purpose of the processing	Legal basis	Type of data collected	Data subjects	Data retention periods
Member pre- registration functionality	Inform students about the use of the Career Center and facilitate their registration	Depending on the Partner Institution: - public interest mission of guidance and professional integration - fulfillment of the training contract between the Partner Institution and the Member - legitimate interest of the Institution in informing students about the use of the	Surname, first name, email address	Students and graduates connected to the Partner Institution	One month from the date of sending the communication

		<p>Career Center and facilitating their registration.</p> <p>JobTeaser: legitimate interest in informing students about the use of the Career Center and facilitating their registration.</p>			
Member registration functionality (SSO)	Enable pre-registration of Members on the Career Center	<p>Depending on the Partner Institution:</p> <ul style="list-style-type: none"> - public interest mission of guidance and professional integration - fulfillment of the training contract between the Partner Institution and the Member - legitimate interest of the Institution in facilitating student registration on the Career Center <p>JobTeaser: Legitimate interest in facilitating the students registration on the Career Center.</p>	Surname, first name, email address, program, technical identification number used by the SSO	Students and graduates connected to the Partner Institution	In case of registration: Until the Member closes the account or due to account inactivity for two years.
Exclusive content	Allow Members to register for events or apply for exclusive internships or jobs made available by the Partner Institution.	<p>Depending on the Partner Institution:</p> <ul style="list-style-type: none"> - public interest mission of guidance and professional integration - fulfillment of the training contract between the Partner Institution and the Member - legitimate interest of the Institution to communicate with students about content exclusively related to guidance and professional integration <p>JobTeaser: contract entered into between the Member and JobTeaser, through the acceptance of the GTCU and the JobTeaser</p>	Surname, first name, email address, CV, cover letter, Profile information (profile picture, description, CV, links to social networks, work experience, academic background, languages spoken)	Members connected to the Partner Institution	Until the Member closes the account or due to account inactivity for two years.

		privacy policy			
Appointment	Enable Members to be guided by career advisors provided by their Institution	Depending on the Partner Institution: - public interest mission of guidance and professional integration - fulfillment of the training contract between the Partner Institution and the Member - legitimate interest of the Institution to support students in the context of career appointments JobTeaser: contract entered into between the Member and JobTeaser, through the acceptance of the GTCU and the JobTeaser privacy policy	Surname, first name, email address, CV, cover letter, Profile information (profile picture, description, CV, links to social networks, work experience, academic background, languages spoken), Member's activity on the platform, notes taken during the appointment by the career advisor	Members connected to the Partner Institution	Until the Member closes the account or due to account inactivity for two years.
Talent Bank	Enable Members to be visible and to be contacted by Partner Companies of their Institution in the framework of recruitment processes	Depending on the Partner Institution: - public interest mission of guidance and professional integration - fulfillment of the training contract between the Partner Institution and the Member - legitimate interest of the Institution to support students in their professional integration JobTeaser: contract entered into between the Member and JobTeaser, through the acceptance of the GTCU and the JobTeaser privacy policy	Surname, first name, email address, Profile information, CV	Members connected to the Partner Institution	Until the Member closes the account or due to account inactivity for two years.
Insights	Promote the exchange of information between Members on their professional experiences	Depending on the Partner Institution: - public interest mission of guidance and professional integration - fulfillment of the training contract	Surname, first name, email address, experiences	Members connected to the Partner Institution	Until the Member closes the account or due to account inactivity for two years.

		<p>between the Partner Institution and the Member</p> <ul style="list-style-type: none"> - legitimate interest of the Institution to support students in their guidance and professional integration <p>JobTeaser: contract entered into between the Member and JobTeaser, through the acceptance of the GTCU and the JobTeaser privacy policy</p>			
Virtual Career Fair (VCF)	Allow Participants to attend Virtual Career Fair Events	<p>Depending on the Partner Institution:</p> <ul style="list-style-type: none"> - public interest mission of guidance and professional integration - fulfillment of the training contract between the Partner Institution and the Member - legitimate interest of the Institution to support students in their guidance and professional integration <p>JobTeaser: contract entered into between the Member and JobTeaser, through the acceptance of the GTCU and the JobTeaser privacy policy</p>	Surname, first name, email address, phone number, gender, CV, cover letter, university, education, graduation year, professional experiences, languages spoken, nationality, notes taken during the appointment by a representative of the Partner Institution or a participating company	Members connected to the Partner Institution	Until the Member closes the account or due to account inactivity for two years.
Email campaigns/ Newsletter	Allow Members to receive targeted communications from their Partner Institution and/or JobTeaser exclusively related to professional guidance and integration	<p>Depending on the Partner Institution:</p> <ul style="list-style-type: none"> - public interest mission of guidance and professional integration - fulfillment of the training contract between the Partner Institution and the Member - legitimate interest of the Institution to support students in their guidance and professional integration 	Surname, first name, email address, campus, program, graduation year	Students, graduates and Members connected to the Partner Institution	Until the Member closes the account or due to account inactivity for two years.

		JobTeaser: contract entered into between the Member and JobTeaser, through the acceptance of the GTCU and the JobTeaser privacy policy			
Learning Module	Allowing Members to access learning content	<p>Depending on the Partner Institution:</p> <ul style="list-style-type: none"> - public interest mission of guidance and professional integration - fulfillment of the training contract between the Partner Institution and the Member - legitimate interest of the Institution to support students in their guidance and professional integration <p>JobTeaser: contract entered into between the Member and JobTeaser, through the acceptance of the GTCU and the JobTeaser privacy policy</p>	Surname, first name, email address, educational level, test results from the module	Members connected to the Partner Institution	Until the Member closes the account or due to account inactivity for two years.
	Inform students about the Module and facilitate their registration	<p>Depending on the Partner Institution:</p> <ul style="list-style-type: none"> - public interest mission of guidance and professional integration - fulfillment of the training contract between the Partner Institution and the Member - legitimate interest of the Institution in informing students about the Module and facilitating their registration. <p>JobTeaser: legitimate interest in informing students about the Module and facilitating their registration.</p>	Surname, first name, email address	Members connected to the Partner Institution	Until the Member closes the account or due to account inactivity for two years.

The main provisions of the joint controller agreement may be communicated by JobTeaser or the Partner Institution to data subjects on request. If you have any questions, you can contact JobTeaser Data Protection Officer at the following address: dataprotection@jobteaser.com

13. Specific information for business prospects

Purpose	Business prospecting
Legal basis	Legitimate interest of JobTeaser or your consent
Type of data collected	First name, last name, title, email address, phone number, social networks accounts, company and position
Source of data	<p>Direct collection:</p> <ul style="list-style-type: none"> ● Contact request, in particular via the contact form; ● Attendance at an event or downloading any documentation related to JobTeaser services; ● Use of similar JobTeaser services. <p>Indirect collection:</p> <ul style="list-style-type: none"> ● Publicly available sources; ● Data Providers; ● Our potential partners.
Retention Period	Three years from the date of collection of the data or last contact from you, or until you object to the processing
Recipients	Authorised employees of JobTeaser, possible partners and technical data processors

14. Code of Conduct

The service complies with the international framework GÉANT Data Protection Code of Conduct (<http://www.geant.net/uri/dataprotection-code-of-conduct/v1>).