



ASSESSFIRST
CONNECTING WITH MEANING

PERSONAL DATA POLICY

Individuals
Customers
Prospects

Version 5 of 28 April 2025

GENERAL PROVISIONS

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, otherwise known as the General Data Protection Regulation (hereinafter "**GDPR**") sets out the legal framework applicable to the processing of personal data.

As part of its business, AssessFirst processes personal data relating to its Customers, Individuals and Prospects.

The purpose of this policy is to meet AssessFirst's obligation to provide information and to formalise the rights and obligations of data subjects with regard to the processing of their personal data.

It is intended to apply to the processing of the personal data of AssessFirst's Customers, Individuals and Prospects, when AssessFirst is acting as a data controller within the meaning of the RGPD.

For a clear understanding of this policy, it is specified that:

- **Customer**, otherwise known as **Recruiters**, are understood to be all natural and/or legal persons who have subscribed to the services offered on the AssessFirst site as part of their professional activities, with a view to assessing the skills of Individuals.
- **Individuals** are defined as any natural person using the services of the AssessFirst site, in particular with a view to recruitment by a Customer, development within the Customer's company, or as part of a personal initiative.
- **Prospects** are understood to be all potential AssessFirst customers whose contacts have been collected, in particular via events and business cards.
- The **Personal Portal** is understood to be the virtual space dedicated to the User and accessible via the "My Personal Space" section.
- **Users** are defined as any natural person who has completed the registration process and created an account on the AssessFirst site, i.e. Individuals, Customers and Prospects during a demonstration phase of the tool.

This policy is independent of any other document that may apply within the contractual relationship between AssessFirst and its Customers, Individuals and Prospects.

It is accepted at the time of registration by Customers and Individuals, at the same time as acceptance of the general conditions of use of the services. Prospects will see this data protection policy applied when they use the service provided by Assessfirst.

AssessFirst will not process the personal data of Customers, Individuals and Prospects if it does not comply with the requirements of this policy and the general principles of the GDPR.

Any new processing, modification or deletion of existing processing will result in a modification of this policy, which will be brought to the attention of the data subjects by the means AssessFirst deems most appropriate (e-mail, notification, on-line information, etc.). If no objection is received within 10 days, the changes will be deemed to have been definitively accepted.

Users are informed that the AssessFirst platform uses Artificial Intelligence (AI) technologies to optimise services. To find out more about our use of AI, please consult our [online FAQ](#).

1. INDIVIDUAL DATA

1.1. TYPES OF INDIVIDUAL PERSONAL DATA

The data collected from Individuals and required to provide the service are as follows:

- Identification and contact details (gender, first name, last name, email, town);
- Professional data (diploma, position, sector of activity, years of experience, certifications, career level, skills and whether or not teleworking);
- Biometric data when using VOICE assessment (voice);
- Identification data (in particular IP address);
- Connection data (logs, token, in particular);
- Acceptance data (click).

The data collected from Individuals on a voluntary basis is as follows:

- Contact details (phone number);
- Professional data (CV, covering letter and professional experience);
- Profile picture;
- Links to social networks (LinkedIn, Twitter, Facebook).

AssessFirst offers psychometric tests designed to determine an Individual's cognitive abilities, motivations and personality, using questionnaires that enable the automated processing of personal data, which corresponds to profiling within the meaning of the GDPR.

AssessFirst does not process sensitive data within the meaning of Article 9 of the GDPR.

When using VOICE, the sole purpose of voice collection and analysis is to verify the consistency of the provided answers by ensuring that they come from the same Individual, without performing biometric identification or single sign-on. In this context, voice data does not constitute sensitive data within the meaning of the GDPR.

1.2. ORIGIN OF INDIVIDUAL DATA

AssessFirst collects the data on Individuals from:

- Registration to online services for Individuals;
- Electronic records or forms completed by Individuals;
- Information collected by Customers and transmitted to AssessFirst.

Data may also be collected indirectly via third-party tools used by the Customer, in particular candidacy-related apps ("Application Tracking System"), when the Customer uses an ATS to share the Individual's profile with AssessFirst.

1.3. CONFIDENTIALITY OF INDIVIDUAL DATA

When registering, Individuals can choose the level of confidentiality of their profile, "Public" or "Private", which can be changed at any time in the "confidentiality" section of their AssessFirst Personal Portal.

Depending on the level of confidentiality chosen, the Individual may or may not authorise other Users to access all or part of his/her Profile.

| | Public profile | Private profile |
|--|----------------|-----------------|
|--|----------------|-----------------|

| | | |
|--|--|---------------------------------------|
| Who can access your profile and view 1) your identity details, contact details and profile photo, 2) your summary of results and 3) your favourite jobs? | Any AssessFirst User and any non-AssessFirst user in possession of the url address of the "public" version of your profile | Only Users on AssessFirst you approve |
| Who can access your profile, interact with your detailed results, download them and match your results with active job searches ? | Only Recruiters who make such a request to the Individual | Only Recruiters you approve |

The Individual retains the ability to revoke his link with a User at any time, directly from his Personal Portal.

Changing the confidentiality level of the Individual's Profile will not affect access by Recruiters who have previously received the Individual's authorisation to access his or her data and results.

1.4. PURPOSES, LEGAL BASES AND RETENTION PERIODS FOR INDIVIDUALS' DATA

| Purposes | Legal basis | Retention time |
|---|---|--|
| Registration and Individual account management, including confidentiality management. Provision of our services, including: <ul style="list-style-type: none"> - Submission of a summary of the questionnaires; - Matches with Individuals and/or Recruiters; - Profile access and sharing of results with the Recruiter(s) authorized by the Individual; - Targeted recommendations for professional development; - Proposal of profile-based job offers (optional); - Account confidentiality management; Support (by phone or online) | Execution of pre-contractual or contractual measures | 2 years from the last activity on the Individual's account |
| Sending additional information or surveys relating to services | Consent | |
| Retention of connection data for security and maintenance purposes | Legitimate interest enabling us to ensure the security and maintenance of the website | <u>Cookies</u> : 6 months for those requiring Individual consent, 13 months for those not requiring it. <u>Technical data</u> : 1 year from collection. |
| Compliance with our legal and/or regulatory obligations | Legal obligation | Until AssessFirst has fulfilled its obligation, and then in an interim archive for the duration of the limitation period for the relevant action. |

After the set deadlines, the data is either deleted or kept after being anonymised, in particular for statistical purposes. It may, however, be kept for pre-litigation and litigation purposes.

Individuals are reminded that deletion or anonymisation are irreversible operations and that AssessFirst is no longer able to restore them afterwards.

1.5. RECIPIENTS OF INDIVIDUALS' DATA

AssessFirst ensures that data is only accessible to authorised recipients, who are subject to an obligation of confidentiality. These recipients are as follows:

- Internal recipients: authorised support, legal and IT staff and their line managers.
- External recipients:
 - o Customers and end-users (when a Customer uses AssessFirst on behalf of an end client);
 - o Other Individuals;
 - o Our IT service providers (data hosting, email, and any talent management tools used by the Customer);
 - o Legal authorities and court officers, where applicable.

2. CUSTOMER DATA

2.1. TYPES OF CUSTOMER PERSONAL DATA

The Customer data collected and required to provide the service are as follows:

- Identity and contact details (gender, first name, last name, email, phone number, country);
- Professional details (business, degrees, roles);
- Information required for payment of Services;
- Identification data (IP address, in particular);
- Connection data (logs, token, in particular);
- Acceptance data (click)

Customer data, collected on a voluntary basis, is as follows:

- Occupational data (sector of activity, years of experience, CV, covering letter, certifications, career level, professional skills and experience);
- Profile picture;
- Links to social networks (LinkedIn, Twitter, Facebook).

AssessFirst does not process sensitive data within the meaning of Article 9 of the GDPR.

2.2. ORIGIN OF CUSTOMER DATA

AssessFirst collects its Customers' data from :

- Data provided by the Customer (forms, purchase orders, contracts, business cards);
- Data found online (websites, social media, etc.);
- Access by the Customer to our online services;
- Registration for events organised by AssessFirst.

Data may also be collected indirectly via AssessFirst's partners or suppliers.

2.3. PURPOSES, LEGAL BASES AND RETENTION PERIODS FOR CUSTOMER DATA

| Purposes | Legal basis | Retention time |
|-----------------|--------------------|-----------------------|
|-----------------|--------------------|-----------------------|

| | | |
|--|---|--|
| Customer relationship management (including contract performance and customer account management) Provision of our services Support (by phone or online) | Execution of pre-contractual or contractual measures | For the duration of the contractual agreement between AssessFirst and the Customer, plus 3 years for sales and promotional purposes, notwithstanding retention obligations and statutory time limits |
| Carrying out surveys | Legitimate interest in improving our products and services | As long as needed to complete an investigation |
| Sending commercial and marketing information about services and managing events organised by AssessFirst | Legitimate interest in promoting our products and services | For 3 years counting from the end of the commercial relationship, or from the last contact with the Customer |
| Retention of connection data for security and maintenance purposes | AssessFirst's legitimate interest in ensuring the security and maintenance of the website | <u>Cookies</u> : 6 months for those requiring Individual consent, 13 months for those not requiring it. <u>Technical data</u> : 1 year from the collection. |
| Compliance with our legal and/or regulatory obligations | Legal obligation | Until AssessFirst has fulfilled its obligation, and thereafter in an interim archive during the limitation period of the relevant action. |

After the set deadlines, the data is either deleted or kept after being anonymised, in particular for statistical purposes. They may be kept for pre-litigation and litigation purposes.

The Customer is reminded that deletion or anonymisation are irreversible operations and that AssessFirst is no longer able to restore them later.

It is up to the Customer to define its own retention period policy for the data of Individuals that it may process, in accordance with the applicable legislation.

2.4. RECIPIENT OF CUSTOMER DATA

AssessFirst ensures that data is only accessible to authorised recipients, who are subject to an obligation of confidentiality. These recipients are as follows:

- Internal recipients: authorised staff in the marketing department, customer relations departments, administrative departments, IT departments and their line managers.
- External recipients:
 - Individuals;
 - Our service providers (in particular for data hosting and emailing);
 - Legal authorities and court officers, where applicable.

3. PROSPECT DATA

3.1. TYPES OF PROSPECT DATA

The Prospects' data collected and required to provide the service are as follows:

- Identity and contact details (gender, first name, last name, email, phone number);
- Professional activity (business, degrees, role);

- Identification data (IP address, in particular);
- Connection data (logs, token, in particular);
- Acceptance data (click)

The Prospects' data collected on an optional basis is as follows:

- Professional details (activity sector, years of experience, CV, covering letter, certifications, career level, professional skills and experience);
- Profile picture.

AssessFirst does not process sensitive data within the meaning of Article 9 of the GDPR.

3.2. ORIGIN OF PROSPECT DATA

AssessFirst collects Prospects' data from:

- Data provided by the Prospect (paper forms, purchase orders, business cards);
- Registration or subscription to our online services (websites, social media, etc.);
- Registration for events organised by AssessFirst.

Data may also be collected indirectly via AssessFirst's partners and suppliers.

3.3. PURPOSES, LEGAL BASES AND RETENTION PERIODS FOR PROSPECTS' DATA

| Purposes | Legal basis | Retention time |
|---|---|--|
| Prospect relationship management | AssessFirst's legitimate interest in building up a prospect base and managing its relationship with them | For 3 years from the date of collection or last contact with the Prospect |
| Support (by phone or online) | AssessFirst's legitimate interest in providing a support service to its Prospects | For the duration required to carry out the support actions |
| Carrying out surveys | AssessFirst's legitimate interest in promoting or improving its products and services, or consent where required by law | As long as needed to complete an investigation |
| Access to AssessFirst services during a demonstration phase | AssessFirst's legitimate interest in promoting its products and services, or consent where required by law | As long as needed for the trial period |
| Sending commercial and marketing information about services and events organised by AssessFirst | AssessFirst's legitimate interest in promoting our products and services, or consent where required by law | 3 years from the date of collection by AssessFirst or the last contact from the prospect |
| Managing requests via the AssessFirst website contact form | AssessFirst's legitimate interest in responding to requests and queries | Until the request is processed, then in an interim archive for 5 years after the request is processed |
| Retention of connection data for security and maintenance purposes | AssessFirst's legitimate interest in ensuring the security and maintenance of the website | <u>Cookies</u> : 6 months for those requiring Individual consent, 13 months for those not requiring it. <u>Technical data</u> : 1 year from collection. |

| | | |
|---|------------------|---|
| Compliance with our legal and/or regulatory obligations | Legal obligation | Until AssessFirst has fulfilled its obligation, and then in an interim archive during the limitation period of the relevant action. |
|---|------------------|---|

After the set deadlines, the data is either deleted or kept after being anonymised, in particular for statistical purposes. They may be kept for pre-litigation and litigation purposes.

Prospects are reminded that deletion or anonymisation are irreversible operations and that AssessFirst is no longer able to restore them.

3.4. RECIPIENTS OF PROSPECTS' DATA

AssessFirst ensures that data is only accessible to authorised recipients, who are subject to an obligation of confidentiality. These recipients are as follows:

- Internal recipients: authorised staff in the marketing department, departments responsible for handling prospecting, IT departments and their line managers.
- External recipients:
 - Our service providers (in particular for data hosting and emailing);
 - Our partners likely to carry out commercial prospecting operations;
 - Legal authorities and court officers, where applicable.

4. DATA LOCALISATION

The data stored by AssessFirst is hosted in France, in a Datacenter operated by AWS which complies with Tier III and ISO 27001 standards. Data backups are hosted on a server operated by AWS in Ireland.

5. DATA PROCESSORS

AssessFirst may entrust specific personal data processing operations in connection with the provision of the services.

A list of data processors and the purposes of the processing is available in our [online FAQs](#).

AssessFirst ensures that its data processors comply with all GDPR provisions, and requires them to implement strict measures to ensure the security and confidentiality of data, so as to ensure protection at least that equal implemented by AssessFirst.

6. MANAGEMENT OF INDIVIDUAL'S RIGHTS

6.1. RIGHT OF ACCESS

Customers, Individuals, and Prospects have the right to ask AssessFirst for confirmation as to whether or not their personal data is being processed, and to obtain detailed information about the processing carried out.

Customers, Individuals, and Prospects also have the right to request a copy of their personal data processed by AssessFirst.

In the event of a request that AssessFirst deems to be manifestly unfounded or excessive, in particular because of its repetitive nature, AssessFirst reserves the right to charge a reasonable fee to the person concerned, taking into account the costs incurred in responding to the request.

This right may be exercised by sending a request:

- In writing, to the following address: 10 Rue de la Paix, 75002 Paris – France; or
- By email, to the following address: privacy@assessfirst.com.

If the request is submitted electronically, the information will be provided in a commonly used electronic form, unless otherwise requested.

The request must originate from the data subject concerned. If necessary, AssessFirst may request a copy of proof of identity if there is reasonable doubt as to the identity of the person making the request.

Customers, Individuals, and Prospects are informed that this right of access may not relate to confidential information or data or data for which communication is not authorised by law.

6.2. RIGHT OF RECTIFICATION

Customers, Individuals, and Prospects have the right to rectify and update their personal data, which may be exercised:

- Directly from their Personal Space, in fields that can be technically and legally updated;
- By submitting a request:
 - In writing, to the following address: 10 Rue de la Paix, 75002 Paris – France; or
 - By email, to the following address: privacy@assessfirst.com.

The request must originate from the data subject concerned. If necessary, AssessFirst may request a copy of proof of identity if there is reasonable doubt as to the identity of the person making the request.

6.3. RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)

Customers, Individuals, and Prospects may request the deletion of their personal data in the following limited cases:

- The personal data are no longer necessary for the purposes for which they were collected or processed ;
- The data subject withdraws the consent on which the processing was based and there is no other legal basis for the processing ;
- The data subject objects to the processing based on the legitimate interests pursued by AssessFirst and there is no legitimate and compelling reason for the processing;
- The data subject objects to the processing for reasons related to his particular situation, or objects to the processing for marketing purposes;
- The personal data was processed unlawfully.

Data subjects are informed that, in accordance with the regulations, the exercise of the right to erasure may be refused where the applicable law to which AssessFirst is subject requires data to be retained.

This right may be exercised:

- Directly from their AssessFirst Personal Portal; or
- By sending a request:
 - In writing, to the following address: 10 Rue de la Paix, 75002 Paris – France; or
 - By email, to the following address: privacy@assessfirst.com.

The request must originate from the person concerned. If necessary, AssessFirst may request a copy of proof of identity if there is reasonable doubt as to the identity of the person making the request.

6.4. RIGHT TO RESTRICTION

Customers, Individuals and Prospects may request that the processing of their personal data be restricted in the following limited cases:

- The person disputes the accuracy of the personal data;
- The processing is unlawful and the data subject objects to the deletion of his or her data, requesting instead that their use be restricted;
- AssessFirst no longer needs the personal data for the intended purposes, but it is still necessary for the data subject to establish, exercise or defend legal claims;
- The data subject has objected to the processing of his or her data, and exercises this right to restriction during the verification as to whether AssessFirst's legitimate motives prevail over those of the data subject.

This right may be exercised by sending a request:

- In writing, to the following address: 10 Rue de la Paix, 75002 Paris – France; or
- By email, to the following address: privacy@assessfirst.com.

The request must originate from the person concerned. If necessary, AssessFirst may request a copy of proof of identity if there is reasonable doubt as to the identity of the person making the request.

6.5. RIGHT TO PORTABILITY

Customers, Individuals and Prospects benefit from a right to portability when the following cumulative conditions are met:

- The data concerned were communicated to AssessFirst by the person concerned;
- The processing is based on consent or on the performance of a contract to which the data subject is a party.

This right may be exercised:

- Directly from their AssessFirst Personal Space;
- By submitting a request:
 - In writing, to the following address: 10 Rue de la Paix, 75002 Paris – France; or
 - By email, to the following address: privacy@assessfirst.com

Data will be provided in a structured, commonly used and machine-readable format.

The request must originate from the person concerned. If necessary, AssessFirst may request a copy of proof of identity if there is reasonable doubt as to the identity of the person making the request.

6.6. RIGHT TO OBJECT

Customers, Individuals, and Prospects may object to the processing of their personal data when it is processed for marketing purposes.

This right may be exercised by sending a request:

- In writing, to the following address: 10 Rue de la Paix, 75002 Paris – France; or
- By email, to the following address: privacy@assessfirst.com.

The request must originate from the person concerned. If necessary, AssessFirst may request a copy of proof of identity if there is reasonable doubt as to the identity of the person making the request.

6.7. POST-MORTEM RIGHTS

Customers, Individuals and Prospects are informed that they have the right to formulate directives concerning the conservation, deletion and communication of their post-mortem data.

Specific post-mortem directives may be communicated and rights exercised by sending a request to:

- In writing, to the following address: 10 Rue de la Paix, 75002 Paris – France; or
- By email, to the following address: privacy@assessfirst.com.

The request must originate from the person concerned. If necessary, AssessFirst may request a copy of proof of identity if there is reasonable doubt as to the identity of the person making the request.

6.8. INDIVIDUAL AUTOMATED DECISION

The tools offered on the AssessFirst website use an algorithm to identify the most relevant profiles for Customers. However, these tools are only decision-making aids for Customers and should not be considered otherwise.

As no sorting or automatic exclusion of Individuals is carried out, AssessFirst does not carry out automated individual decisions as referred to in Article 22 of the GDPR.

7. ADDITIONAL PROVISIONS

7.1. OPTIONAL VS. MANDATORY NATURE OF THE RESPONSES

Customers, Individuals and Prospects are informed on each collection form of the mandatory or optional nature of the data to be provided by the presence of an asterisk.

The data indicated as mandatory is that which is strictly necessary for the provision of AssessFirst services to the person concerned.

7.2. COOKIES AND TRACKERS

Cookies or tracers may be installed on the terminal of visitors to the AssessFirst website.

All the information relating to the management of these cookies and tracers can be accessed at any time on the AssessFirst website by clicking on "Manage your cookies" at the foot of the page.

7.3. DATA PROTECTION IMPACT ASSESSMENT (DPIA)

AssessFirst has carried out a Data Protection Impact Assessment (DPIA), which is available on a Customer's request.

7.4. CUSTOMER RESPONSIBILITY

When the Customer decides to download the personal data of Individuals from the Site, and in particular the Individuals' evaluation reports, the Customer knowingly acts as a separate data controller and is, as such, fully responsible for respecting the confidentiality and security of the data downloaded, as well as for respecting the legal retention periods that the Customer alone decides to apply.

Free comment fields may be made available to the Customer. In this context, the Customer is and remains solely responsible for their content and undertakes to ensure that these annotations are not inappropriate, subjective or insulting to the Individual. AssessFirst declines all responsibility in the event of requests and/or actions by Individuals based on comments published by Users in the dedicated areas.

8. CONTACT PERSONS

8.1. DATA PROTECTION OFFICER

AssessFirst has appointed the following data protection officer:

Name: Lucile WHITBECK

Mailing address: 10 Rue de la Paix, 75002 Paris – France

Email address: privacy@assessfirst.com

Phone: +33 1 72 77 31 52

8.2. RIGHT TO FILE A COMPLAINT WITH THE CNIL

Customers, Individuals and Prospects concerned by the processing of their personal data have the right to lodge a complaint with a supervisory authority, namely the Commission Nationale de l'Informatique et des Libertés in France, if they consider that the processing of data concerning them does not comply with European data protection regulations.

The CNIL's can be contacted as follows :

- By post, to the following address: CNIL – Service des plaintes, 3 Place de Fontenoy – TSA 80715 – 75334 Paris CEDEX 07
- By phone: +33 1 53 73 22 22

9. FOR MORE INFORMATION

For any further information, please contact our Data protection officer at the following e-mail address: privacy@assessfirst.com.

For more general information on the protection of personal data, visit the CNIL website at www.cnil.fr.