# Personal Data Protection Notice

## Introduction

Protecting personal data is of great importance to WSA, which is committed to complying with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (GDPR). The organisation is also committed to complying with any other applicable laws and regulations.

## Scope

This personal data protection notice explains how WSA, acting as a data controller, collects, uses, shares and otherwise processes your personal data as part of your relationship with us when you apply for a job, in accordance with applicable data protection laws and regulations.

## Categories of personal data processed

The term "personal data" means any information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold.

We collect the personal data that you include in your application when you send us an unsolicited application, apply for an existing job offer.

Identification data such as last name, first name, title, nationality, a copy of your identity card (if applicable), or the identification code if your application has been recommended by one of our employees;

Contact details such as postal address, e-mail address, phone number;

Professional data such as current position, work experience, skills, education, CV and cover letter;

Information relating to offences, namely the extract from your criminal record. (consulation only. These records remain in your custody);

## Legal bases and purposes of processing

The processing of your personal data is always specific to a particular purpose, and only the relevant personal data is ever processed.

We process your data for the following reasons:

| Legal bases | Purpose |
|---|---|
| Execution of pre-contractual measures or legitimate interest | Processing of applications received (registration, entry of information into the database...) |
| Legitimate interest or legal obligation | Criminal record check |
| Legitimate interest | if applicable Assessment of the qualifications and skills necessary to perform the job to which you are applying |
| Execution of pre-contractual measures or legitimate interest (depending on the stage of the recruitment process) | Conducting interviews |
| Legitimate interest and / or execution of a contract or pre-contractual measures, depending on the stage of the recruitment process at which the communication takes place | Communication regarding the hiring process (emails, phone calls, texts) |
| Consent | Retention of CVs of unsuccessful candidates for the purpose of contacting them for future employment opportunities |
| Consent: We will only contact your former employers if you give us your explicit consent | Reference checks, if applicable |

Withdrawal of consent at any time is possible by contacting us as indicated below. Please note that withdrawing your consent does not affect the lawfulness of processing based on consent before its withdrawal.

## Personal data handlers

In order to fulfil the purposes listed above, the data will be transferred to the following recipients:

Employees involved in the recruitment process;
Third-party service providers acting as sub-processors on behalf of WSA. In this case, a contract is established between WSA and the sub-processor in question and appropriate technical and organizational measures are put in place in accordance with Articles 28 and 32 of the GDPR.

## Retention period:

We only keep your data for as long as is necessary for the purposes pursued by WSA. If you are not selected, we will keep your personal data for 12 months after your last application. This enables us to contact you if a similar position becomes available for which you may be suitable. Each time you submit an application, the retention period is reset. We also retain your data to enable us to demonstrate, in the event of legal action, that we have not discriminated against candidates on prohibited grounds, and that we have conducted the recruitment process and pre-employment screening fairly and transparently.

## Data subjects' rights.

As a natural person, you have several rights regarding your personal data that can be exercised in certain circumstances. These include:

The right of access: You can request access to your data at any time, as well as a copy of it.
The right to rectification: You can request the rectification of inaccurate, incomplete or out-of-date personal data about you.

The right to erasure: You can request that your data be deleted when it is no longer necessary for the purposes for which it was collected or processed, for example.

The right to restriction of processing: You can request that WSA restrict the processing of your data if you question its accuracy or object to its processing.

The right to data portability: The right to data portability allows you to receive, free of charge, the data you provided to a controller, in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

The right to object to processing: You can object to the processing of your data and withdraw your consent if the processing is based on consent; for example, if the data is used for commercial prospecting purposes.

If you wish to exercise your rights, please contact us at dpo@wsa.lu