



Privacy Policy for Recruitment

Last updated: September 16th, 2019

Mirakl (“Mirakl”, “We” or “Us”) take your privacy very seriously. This Policy describes Mirakl’s privacy practices regarding the use of personal data collected from you, or that you provide to Us, that will be processed by Us in connection with Our recruitment processes.

More precisely, it explains which data we collect, how we will treat it and our obligations described in the General Data Protection Regulation (“GDPR”) as Data Controller. We, Mirakl, are a company incorporated in France, with offices located at 45, rue de la Bienfaisance, 75008 Paris.

Where you apply for a job opening via the application function on a job site or similar online service provider (“Partner”), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Such data will also be processed by our recruitment processing partner, Workable. Any use by the Partner of your data will be in accordance with the Partner’s Privacy Policy. We do not control our partner’s use of such data.

Where you apply for a job opening posted by Us, these Privacy Policy provisions will apply to Our processing of your personal information.

What data we collect

We collect and process the following types of information from you (together, “Personal Data”): Information provided when you apply for a job opening, notably through an online job site (such as Indeed or LinkedIn or directly via Mirakl’s websites), via email, in person at interviews and/or by any other method, such including but not limited to:

- name;
- email address;
- address;
- date of birth;
- qualifications; and
- experience.

We may receive your personal data from a third-party who recommends you as a candidate for a specific job opening or for Our business more generally.

How we use your information

Lawful basis for processing

We rely on legitimate interest and consent as the lawful basis on which We collect and use your personal data:

- Our legitimate interests are the recruitment of staff for Our business
 - Your consent is given when you consent to the processing of your personal information
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Purposes of processing

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that We receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill Our job openings.

Automated decision making/profiling

We use Workable's technology to select appropriate candidates for Us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied.

The process of finding suitable candidates is automatic, however, any decision as to who We will engage to fill the job opening will always be made by Our staff.

How we store your personal data

Where we store your Personal Data

Where We store your Personal Data in Our own systems, it is stored EMEA.

Disclosure of your Personal Data

Your personal data may be transferred and processed by our affiliated companies Mirakl Limited and Mirakl Incorporated where we will consider your candidature for a role in one of these offices. Mirakl Incorporated is a company incorporated in the state of Delaware, United States, where the obligations as regards personal data protection are different than under the GDPR.

This is why Mirakl Incorporated complies with the **EU-U.S. Privacy Shield Framework** as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Mirakl has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, please visit <https://www.privacyshield.gov/>

If you would like further information, please contact Us (see 'Contact' below). We will not otherwise transfer your personal data outside of the EEA, share it with third parties other than Workable, nor shall we sell it.

How long do we keep your personal data

We will delete your data **24 months** after our last contact.

Your personal information will be deleted earlier on one of the following occurrences:

- Deletion of your personal information by you; or
- Receipt of your written request for deletion.

Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:



- access to your personal data and to certain other supplementary information that this Privacy Policy is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to Our continued processing of your personal data
- otherwise restrict Our processing of your personal data in certain circumstances
- claim compensation for damages caused by Our breach of any data protection laws.

If you would like to exercise any of those rights, please:

- contact Us using Our Contact details below,
- let Us have enough information to identify you,
- let Us have proof of your identity and address, and
- let Us know the information to which your request relates.

How we protect your data

Mirakl puts in place all the necessary measures to protect your data from unauthorized access to, disclosure, alteration, or loss. In particular, we use SSL certificates to encrypt our websites and only a limited number of staff have access to the data we use. We review and update our practices regularly to enhance your privacy and ensure that our internal policies are followed.

If you have found a vulnerability or would like to report a security incident, you may send an email to security@mirakl.com.

The security of our applications and infrastructure is paramount to us and our clients. At Mirakl, we value coordinated disclosure when it comes to security issues. That is why we encourage reporters to privately disclose their findings and provide us with a reasonable time frame so that we can investigate, develop and deploy any necessary fix.

How to complain

We hope that We can resolve any query or concern you raise about Our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

Contact

If you wish to access, correct, modify or delete your personal data or if you have any question regarding this policy, please contact us at gdpr@mirakl.com.
