

Recruitment Privacy Policy

As part of its recruitment activities, Ceva Santé Animale (FR-33500 Libourne, de la Ballastiere avenue 10.) and Ceva-Phylaxia Zrt. (1107 Budapest, Szállás utca 5(hereinafter collectively “Ceva” or “Ceva Group”) collect and process Personal Data in its capacity as joint data controllers in accordance with:

- European General Data Protection Regulation No. 2016/679 of 27 April 2016 (known as the “GDPR”),
- National data protection laws,
- Recommendations on the implementation of the GDPR.

When you apply for a position that includes an affiliate of the Ceva Group, the affiliate to which the position is attached is also a joint data controller. These affiliates can be the following companies:

- Poland: Ceva Animal Health Polska Sp. z o.o, (ul. Okrzei 1A 03-715, Warszawa, Poland; e-mail: contact.poland@ceva.com)
- Slovakia: Ceva Animal Health Slovakia, s.r.o. (Prievozska 5434/6A, 821 09 Bratislava, Slovakia; e-mail: ceva@ceva-ah.sk)
- Romania: Ceva Sante Animale Romania SRL (Str. Chindiei nr. 5, sector 4, Bucurest 040185, Romania; e-mail: cevaromania@ceva.com)
- Bulgaria: Ceva Animal Health Bulgaria EOOD (Iztok, No. 26 Elemag Street, Entr. B, Floor 1, Ap. 1, Sofia 1113, District Sofia (Capital); e-mail: cevabulgaria@ceva.com)

1. PURPOSE

The purpose of this Privacy Policy (hereinafter “the Policy”) is to inform you in a clear, simple and complete manner about how Ceva collects and uses certain Personal Data about you **as part of our recruitment process**, and about the means available to you to control this use and exercise your rights in relation to it.

This Policy applies to you when you apply for a job offer or send us an unsolicited application or if you have been referred for a position.

2. WHAT IS PERSONAL DATA?

Personal Data means any information or set of information that can be used to identify you, either directly (e.g., surname, first name, e-mail address, home address, photograph(s), etc.) or indirectly (e.g., by means of pseudonymized Data such as a unique identification number, etc.).

Unique identifiers may also be considered Personal Data, such as the IP address of your computer.

3. WHEN IS YOUR PERSONAL DATA COLLECTED?

Ceva may collect your Personal Data directly or indirectly.

Direct Collection:

When you transmit your data directly to Ceva

Examples include sending a CV and/or a cover letter, providing proof (diploma, work certificate, etc.), filling out a form, answering during an interview, etc. ;

Indirect Collection:

When Ceva collects and processes Data that does not come from you.

Examples: taking references from a former employer; information obtained from professional social networks; information obtained through a recruitment agency; information received through co-optation, etc.

4. WHAT ARE THE PURPOSES OF THE PROCESSING

- Searching for and identifying relevant candidates

- The creation of a CV database,
- Pre-selection of candidates on the basis of an assessment of skills and abilities,

5. WHAT PERSONAL DATA IS COLLECTED

Treatment	Categories of Personal Data	Legal basis	Retention period
Account Creation	surname, first name, email address, telephone number	Consent	The data will be processed until the account is deleted . You can delete your account at any time through your account. Otherwise, it will be automatically deleted after two years without login.
Selection of candidates on the basis of an assessment of skills and abilities, managing responses to a Job Posting	Data available in your CV and cover letter and other documents provided, including surname, first name, email address, telephone number, photo, education, professional experience, languages spoken, salary expectations, home address, hobby, family situation, gender for diversity objectives, age, nationality, whether you are at least 18 years of age, whether you have ever been employed by Ceva, geographical mobility exchanges with Ceva.	Legitimate interest (verification of applicant's skills and compatibility with the position)	Three months after the end of the recruitment process
Creation of a pool of candidates allowing you to contact each other for other job offers	Surname, first name, email address, telephone number, home address Data on your CV, including experience, photo, skills, level of education, languages spoken, salary expectations, hobbies, family situation	Consent	Unless you delete your account by you, 2 years after your consent.
Management of unsolicited applications	Data available in your CV and cover letter or other documents, including name, surname, email address, telephone number, photo, education, professional experience, languages spoken, salary expectations, home address, hobbies, family situation, gender for diversity purposes, age, nationality.	Consent	2 years from the date of submission of your application except for US (4 years) due to OFCCP's record-keeping requirements.
Management of possible discrimination actions	Information strictly necessary for evidentiary purposes	Legal Obligation (Act I of 2012 on the Labour Code 12.	3 years from the date of submission

		§ (1), Act CXXXV of 2003 on equal treatment and the promotion of equal opportunities 5.§ d)	of your application.
Co-optation management	Email adress	Legitimate interest	X
Management of Requests for right	Identification data (surname, first name, email address, information necessary for your identification when you interact with Ceva)	Legal Obligation [GDPR Article 12 (6)]	6 years

Additional Categories of Personal Data

Please note that local law may require us to collect additional information about you. In addition, for certain job categories it may be necessary to process Data necessary for the assessment of suitability for a position, for example if the position requires a driver's license or a specific certification or training.

Highly Personal Data and Sensitive Personal Data

Depending on applicable national law, this Personal Data may include Data relating to racial or ethnic origin, health but also information on criminal offences and convictions as well as identification numbers such as passport number, social security number, etc. Ceva does not process this data unless the nature of the work requires it and within the strict scope permitted by applicable laws.

6. HOW LONG IS THE DATA STORED AND WHAT IS THE PROCEDURE FOR DELETION?

Ceva only keeps your Personal Data for as long as is necessary to achieve the purposes pursued, subject to legal archiving possibilities, obligations to retain certain Data and/or anonymization.

These retention periods are defined according to the purposes of the processing and take into account, in particular, the applicable legal provisions imposing a specific retention period.

The details of Ceva's retention periods of your Data are set out in the table in point 5.

7. TO WHOM MAY WE SHARE YOUR PERSONAL DATA?

Accession

As your Personal Data is confidential, only persons duly authorised by Ceva by virtue of their functions may access your Data without prejudice to its possible transmission to the extent required by the applicable regulations.

The transmission of your Data takes place exclusively within the framework of the recruitment process:

- To teams identified as authorized to process Personal Data in the recruitment process, namely:
- The Ceva HR teams and the HR teams of the various companies of the Ceva Group the position is attached to,
- The managers of the position you are applying for,
- Other internal teams such as IT, Ceva's onboarding, etc.

Ceva undertakes to take all appropriate organizational and technical measures to preserve the security, integrity and confidentiality of the Data.

Recipients of the data

Recipients may access your Personal Data only to meet Ceva's needs.

When we share your Personal Data, we make sure to do so only with recipients who protect your Personal Data.

We apply the following sub-proceccors in connection with recruitment:

- Microsoft Corporation (Redmond, Washington, United States): IT services
- Cornerstone OnDemand (1601 Cloverfield Blvd, Suite 600 South, Santa Monica, CA 90404): IT services

In addition, your Personal Data may be transmitted to companies belonging to the Ceva Group in order to receive, process applications and communicate them to the various entities of the Ceva Group.

Your Personal Data will only be shared as described in this Policy.

However, we may share this Data with public administrations and bodies in accordance with legal provisions.

8. TRANSFERS OUTSIDE THE EUROPEAN UNION:

We transfer your personal data necessary for the performance of the data processing activities to our US seated data processors listed above. The legal base of the data transfer is the EU-US Data Privacy Framework, all the sub-processors are included in the list of companies providing appropriate guarantees ([Data Privacy Framework List](#)).

9. HOW IS THE SECURITY OF YOUR PERSONAL DATA MAINTAINED?

Ceva takes care to protect and secure your Personal Data, in order to ensure its confidentiality and to prevent it from being distorted, damaged, destroyed or disclosed to unauthorized third parties.

When the disclosure of Data to third parties is necessary and authorized, Ceva ensures that these third parties guarantee the Data concerned the same level of protection as that offered to them by Ceva, by requiring contractual guarantees providing in particular that the Data may be processed exclusively for the authorized purposes with all the required confidentiality and security.

Ceva implements technical and organizational measures to ensure that Personal Data is stored as securely as possible for the time necessary to achieve the purposes pursued, in accordance with applicable law.

Although Ceva takes all reasonable steps to protect your Personal Data, no transmission or storage technology is completely foolproof.

In accordance with applicable law, in the event of a proven breach of Personal Data likely to result in a high risk to the rights and freedoms of data subjects, Ceva undertakes to communicate this breach to the competent supervisory authority and, when required by said regulations, to the data subjects.

Without prejudice to the foregoing, it is your responsibility to exercise caution to prevent any unauthorised access to your Personal Data and your terminals (computer, smartphone, tablet, etc.), in particular by choosing a strong password.

10. WHAT ARE YOUR RIGHTS?

Subject to the conditions set out in the regulations in force, you have the following rights with regard to your Personal Data:

- ***Right to information about the processing of your Personal Data***

Ceva strives to provide you with concise, transparent, understandable and easily accessible information, in clear and simple terms, on the conditions of the processing of your Personal Data.

- ***Right to access, rectify and erase (or “right to be forgotten”) your Personal Data***

The right of access entitles you to obtain confirmation from Ceva as to whether or not your Personal Data is being processed by us, and the conditions of such processing, as well as to receive a copy of it (for any additional copy, Ceva is entitled to demand the payment of any

reasonable fees based on the administrative costs incurred). Where this request is made electronically, the information will be provided in a commonly used electronic form, unless you request otherwise.

You also have the right to obtain, without undue delay, the rectification of your Personal Data that is inaccurate or incomplete.

Finally, subject to the exceptions provided for by applicable law (e.g., retention necessary to comply with a legal obligation), you have the right to request the erasure, without undue delay, of your Personal Data, when one of the following grounds applies:

- ***your Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;***
 - ***you wish to withdraw your consent on which the processing of your Personal Data was based, if any, and there is no other basis justifying such processing;***
 - ***you consider and can establish that your Personal Data has been unlawfully processed;***
 - ***your Personal Data must be erased by virtue of a legal obligation.***
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- ***Right to restrict the processing of your Personal Data***

The applicable regulations provide that this right may be invoked in certain cases, in particular the following:

- ***when you contest the accuracy of your Personal Data, such Data processing may be restricted for the time necessary to verify its accuracy;***
 - ***where you consider and can establish that the processing of the Personal Data is unlawful but you object to the erasure of the Personal Data, in this situation you may request the restriction of the processing instead;***
 - ***when Ceva no longer needs your Personal Data but you still need it for the establishment, exercise or defence of legal claims;***
 - ***when you object to processing that is based on the legitimate interest of the data controller, during the verification of whether the legitimate grounds pursued by the data controller prevail over yours.***
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- ***Right to object***

You may object at any time to the processing of your Personal Data, including profiling, for reasons relating to your particular situation. Your Data will no longer be processed unless there are compelling legitimate grounds for such processing, which override your interests, rights and freedoms or reasons related to the establishment, exercise or defence of legal claims.

- ***Right to portability of Personal Data***

Where the processing is based on your consent or a contract, this right to portability allows you to receive the Personal Data that you have provided to Ceva in a structured, commonly used and machine-readable format, and to transmit such Personal Data to another controller without hindrance to Ceva.

Where technically feasible, you may request that such Personal Data be transmitted directly to another data controller by Ceva.

- ***Right to withdraw consent to the processing of Personal Data***

Where Ceva processes your Personal Data on the basis of your consent, this consent may be withdrawn at any time.

On the other hand, and in accordance with applicable law, the withdrawal of your consent is only valid for the future and therefore cannot call into question the lawfulness of the processing carried out before this withdrawal.
In addition, you have the option to delete your Personal Data in your account.

- ***Right to lodge a complaint with a supervisory authority***

If, despite Ceva's efforts to preserve your Personal Data, you believe that your rights are not being respected, you have the right to lodge a complaint with a supervisory authority. You can lodge your complaint either with the lead supervisory authority: Commission Nationale de l'Informatique et des Libertés (3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, FRANCE; +33 (0)1 53 73 22 22) or with the Hungarian supervisory authority: Nemzeti Adatvédelmi és Információszabadság Hatóság (1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf. 9. ; phone: +36 1 391 1400; fax: + 36 1 391 1410; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu). If the data protection authority does not take action with your lodged complaint, or does not inform you within three month about the developments of the proceeding or its result, or you consider, that the processing your personal data violates your rights under GDPR, you shall have the right to file a claim with the competent court.

- ***Right to decide the fate of your Personal Data after your death***

Finally, you have the right to organize the fate of your Personal Data post-mortem by adopting general or specific directives. Ceva is committed to complying with these guidelines.

In the absence of directives, Ceva recognises the possibility for heirs to exercise certain rights, in particular the right of access, if it is necessary for the settlement of the deceased's estate; and the right to object to the closure of the deceased's user accounts and to object to the processing of their Data.

11. HOW TO EXERCISE YOUR RIGHTS?

If you have any questions about this Privacy Policy and/or wish to exercise your rights as described above, you may contact Ceva using the form ([Privacy policy – Ceva Privacy policy](#)) or at any other contact details of the data controllers. The e-mail address of the DPO of Ceva Group is privacycompliance@ceva.com.

Ceva undertakes to respond to you as soon as possible, and in any event, within one month of receipt of your request.

If necessary, this period may be extended by two months, taking into account the complexity and the number of requests sent to Ceva. In this case, you will be informed of the extension and the reasons for the postponement.

If your application is submitted electronically, the information will also be provided to you electronically where possible, unless you expressly request otherwise.

If Ceva does not comply with your request, it will inform you of the reasons for its inaction and you will have the possibility to lodge a complaint with a supervisory authority and/or to lodge a legal appeal.