

OAT PERSONAL DATA PROTECTION NOTICE

This document is used in the context of recruitment

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Introduction

Open Assessment Technologies S.A. (hereinafter "**OAT**", "company", "we", "us" or "our") attaches great importance to the protection of personal data and undertakes to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 ("GDPR") as well as any other applicable laws and regulations.

Scope

This personal data protection notice("Notice") explains how **OAT**, in its capacity as data controller, collects, uses, shares and otherwise processes your personal data as part of your relationship with us as a candidate applying for a job offer, in accordance with applicable laws and regulations on the protection of personal data.

Update

This Notice will be reviewed on a periodic basis. Any changes to this Notice shall be approved by **OAT**. The latest version of this Notice will always be available on our website.

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 or are contacted by an **OAT** consultant to fulfill recruitment needs of **OAT**:

- Identification data such as last name, first name, title, nationality;
- Contact details such as e-mail address and phone number;
- Professional data such as current position, work experience, skills, education, CV and cover letter;
- If applicable, information relating to your disability situation or your professional reclassification for an adapted position.

If you are selected to be hired, then we will collect additional personal information to fulfill the onboarding needs of **OAT**:

- Postal address;
- If applicable, information relating to offences, namely the extract from your criminal record;
- If applicable a copy of your identity card or the identification code if your application has been recommended by one of our employees;

In any case, only the personal data strictly necessary for the processing of your application is processed and does not include special categories of data such as political opinions, religious beliefs or health-related data.

We also collect data from:

- If applicable, references (i.e., your former employers) that you have designated, from whom we collect the following categories of data: name, previous periods of employment, performance during the previous employment;
- Publicly accessible sources, such as LinkedIn and other job boards, from which we collect name, email address, academic and professional background, as well as other relevant data appearing on your profile.

If you are invited to an interview, it usually takes place by phone or videoconference in order to simplify communication and avoid unnecessary travel.

Legal bases and purposes of processing

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose.

We process your data for the following purposes:

Legal bases	Purpose
Execution of pre-contractual measures or legitimate interest depending on how candidates have been approached	Processing of applications received (registration, entry of information into the database...)

Legitimate interest: reporting on a candidate's criminal history	Criminal record checks
Legitimate interest: assessing candidates' competencies, skills, and experience against our hiring criteria	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, including video interviews
Legitimate interest: identifying, attracting and engaging potential candidates	Candidate sourcing i.e., approaching candidates directly and arousing their interest in a position
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	Reference checks, if applicable

When we process your data on the basis of your consent, you have the right to withdraw your consent at any time by contacting us as indicated below. It should be noted that the withdrawal of your consent does not affect the legality of the data processing based on the consent before its withdrawal.

Also, please be informed that if you refuse to provide certain information, **OAT** may not be able to move forward in the hiring process.

Recipients of personal data

To achieve the purposes listed above, the data is transferred to the following recipients:

- The employees involved in the recruitment process;
- Companies that have a business relationship with **OAT** and may be interested in your profile;
- Third-party service providers acting as sub-processors and on instructions from **OAT**.

In this case, a contract is established between **OAT** 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. **OAT** only uses sub-processors with sufficient guarantees and who are imposed the same obligations.

As a general rule, no data is transferred outside the EU/EEA. Nevertheless, when a third-party service provider processes data outside the EEA as part of the provision of services, appropriate measures, usually in the form of standard contractual clauses, are put in place.

Retention period

Your data is kept only for the duration related to the purposes pursued by **OAT**. Thus, if your application is unsuccessful, your application files will be deleted within a period of 2 months after the end of the recruitment process.

In addition, when you send us an unsolicited application, the latter will be deleted in case there are no appropriate job openings matching your profile.

Finally, we also keep your data in order to prove, in the event of legal action, that we did not discriminate against candidates on prohibited grounds and that we conducted the recruitment process and the pre-employment selection in a fair and transparent manner.

Security of personal data

We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk so that the processing complies with the GDPR and applicable data protection laws.

These measures must provide for a level of security considered appropriate considering the technical standards and the type of personal data processed but also:

- the state of the art and implementation costs.
- the nature, scope, context, and purposes of processing; and
- the likelihood and severity of the risk to the rights and freedoms of natural persons.

Security requirements are continually evolving, and effective security requires frequent assessment and regular improvement of outdated security measures. We are committed to continuously evaluate, strengthen, and improve the measures we implement.

Data subjects' rights

As a natural person, you have several rights regarding your personal data that we can exercise in certain circumstances, including:

- **the right of access:** You can request access to the data concerning you at any time as well as a copy of the data.
- **the right to rectification:** You can request at any time that inaccurate or incomplete data be rectified.
- **the right to erasure:** You can request that your data be deleted when, for example, the data is no longer necessary for the purposes for which it was collected or processed.
- **the right to restriction of processing:** You can request that **OAT** restrict the processing of data if, for example, you question the accuracy of the data concerning you or if you object to the processing of data concerning you.

- **the right to data portability:** You have the right to have your data transferred to another data controller in a structured, commonly used, and machine-readable format, if the processing is carried out by automated means or if it is based on prior consent.
- **the right to object to processing:** You can object to the processing of your data and can 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 privacy@taotesting.com

Your request will be responded to within 1 month at the latest, starting from the moment of your identity confirmation. We may extend the time limit by a further 2 months if the request is complex or if we have received a high number of requests.

You will in general not have to pay a fee to exercise any of your individual rights mentioned in this Notice. However, we may charge a reasonable fee if your request to exercise your individual rights is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you are not satisfied with our response, you also have the right to lodge a complaint at any time with the competent supervisory authority within the EU depending, among other things, on the country the place of your habitual residence (where you live most of the time), on the place where you work or on the place where you believe infringement may have happened.

Depending on your choice, these supervisory authorities may be relevant to you if you wish to complain:

LUXEMBOURG

Commission nationale pour la protection des données (CNPD)

15, Boulevard du Jazz
L-4370 Belvaux

SPAIN

Agencia Española de Protección de Datos (AEPD)

C/ Jorge Juan,6
28001-Madrid

Links

Our website contains links to other websites but note that this Notice applies only to personal data collected by **OAT** and to how **OAT** processes personal data. We are not responsible for the privacy practices of other websites.