



# CHAMP Candidates Privacy Notice

Effective date: 6 June 2024

Version 0.2



## Owner

Kathleen Benavidez, Privacy & Compliance Manager

## Document history

Version	Date	Author	Notes
V0.1	02Nov2018	Gertrud Huberty	Original version released
V0.2	05Jun2024	Kathleen Benavidez	Rebranding and minor updates
V0.2	06Jun2024	Agathe Domon	Minor revision

## Document approvals

Version	Date	Approver	Notes

## External references

Document Title	Version

## Glossary

Term or abbreviation	Description



## Contents

---

1	Introduction	4
2	What personal data does CHAMP process?	4
3	For what purposes are personal data collected and processed?	5
4	Who are the data recipients?	5
5	How does CHAMP protect personal data it processes?	6
6	What are the candidates' rights?	6



## 1 Introduction

---

The purpose of this Candidate Privacy Notice is to set out the conditions under which CHAMP Cargosystems S.A., registered with the Luxembourg Trade and Companies Register under number B96736, having its registered office at 2, rue Edmond Reuter, L-4362 Contern, Luxembourg (CHAMP), collects and processes the personal data pertaining to candidates during a recruitment process (the CANDIDATES). It applies to all CANDIDATES applying to CHAMP, regardless of the nature/contract type of the position in question (fixed-term contract, permanent contract, internship contract, etc.) and replaces, from the date of its notification, any other clause or reference relating to CANDIDATES' personal data.

## 2 What personal data does CHAMP process?

---

The personal data collected and processed by CHAMP are provided either by the candidate directly (during the recruitment process or later) or by third-parties such as online search engines, companies specializing in recruitment or public bodies, and notably includes:

- a. Any information a candidate provides in their Curriculum Vitae (CV);
- b. any information found during a professional background check or gathered during personality tests;
- c. data necessary for the administrative management of the candidate (date and conditions of previous employment, reason for work stoppage, assessment of professional abilities, employee qualifications, foreign languages spoken, etc.), work permit (if applicable)
- d. Information that is checked but not kept ( e.g. criminal record, - depending on local laws).

As part of the execution of the employment contract or internship agreement, CHAMP may also process electronic communications issued or received from IT tools made available to the employees by CHAMP.



### 3 For what purposes are personal data collected and processed?

---

The personal data processing is necessary for enabling the recruitment (pre-contractual) process, as well as to enable CHAMP to fulfil its legal obligations. These purposes constitute the legal basis for the data processing carried out by CHAMP. This processing is also in CHAMP's legitimate interest as it enables it to assess candidate best fit during the recruitment process.

CHAMP will process the personal data for the following purposes:

- a) confirming candidate's identity, nationality, country of residence, right to work in the country, etc.;
- b) confirmation of candidate's qualifications and experience;
- c) ensuring effective communication with the candidate;
- d) compliance with legal obligations applicable to CHAMP.

### 4 Who are the data recipients?

---

Personal data will be processed internally by duly authorized persons, within the limits of their respective attributions, i.e.:

- a) CHAMP's executive board;
- b) CHAMP services responsible for recruitment, personnel management and payroll;
- c) CHAMP services responsible for financial control and administrative tasks;
- d) Hiring Managers of the vacant positions concerned.

They may also be communicated to:

- a) CHAMP data processors/sub-processors (including recruitment and payment service providers) to the strictest extent necessary and subject to the existence of contractual guarantees to ensure the security and confidentiality of the personal data. Where these recipients are located outside of the European Union, such data sharing is governed by Standard Contractual Clauses (SCCs).
- b) CHAMP's shareholding companies SITA Information Networking Computing UK Ltd, and any of the CHAMP Group affiliated companies and subsidiaries, to the strictest extent necessary and subject to the



existence of contractual guarantees to ensure the security and confidentiality of the data. Where these recipients are located outside of the European Union, such data sharing is governed by the inter-company Data Transfer Agreement (DTA).

## 5 How does CHAMP protect personal data it processes?

---

Personal data is processed by CHAMP as a data controller, in compliance with the applicable data protection legislation (GDPR and other local privacy laws).

CHAMP implements technical and organizational security measures to ensure the protection of the personal data against the risks associated with the use of information systems.

For unsuccessful candidates, personal data is kept for six months following acceptance of the employment offer by the successful candidate. Following these six months, such data pertaining to the unsuccessful candidates is deleted/destroyed unless the candidate is put on a reserve list for future vacancies, in which case the data will be kept for two years.

## 6 What are the candidates' rights?

---

In accordance with the current data protection legislation, the candidate (or, as the case may be, his/her beneficiaries who can prove they have a legitimate interest) are entitled, free of charge, to:

- a) access to the personal data concerning the candidate;
- b) obtain confirmation that the candidate's personal data being processed or not;
- c) obtain information concerning the purpose of the processing, the categories of personal data to which the processing relates and the recipients or categories of recipients to whom the personal data are communicated;
- d) receive communication, in an intelligible form, of the personal data being processed, as well as any available information on the origin of the such data;



- e) rectify his/her personal data and a right to object to the collection and processing of such data, on the basis of compelling legitimate grounds;
- f) request the erasure of all or part of the personal data or a restriction of the processing, object to the processing or make use of its right to data portability, within the limits provided by the applicable rules;
- g) lodge a complaint before a supervisory authority such as the National Commission for Data Protection (CNPD) in Luxembourg in the event of a breach of the data protection rules.

These rights may be exercised with the Corporate Data Protection Officer (DPO), whose contact details are as follows:

Gertrud HUBERTY  
2, rue Edmond Reuter  
Zone d'Activités "Weiergewan"  
L-5326 Contern, Luxembourg  
Email: [dpo@champ.aero](mailto:dpo@champ.aero)  
Phone: +352 2681 6205