

ARTICLE 1 : PREAMBLE

This policy, in its version dated **March 26, 2025**, is intended to inform users of the **Alternative Strategies** website :

- About how their personal data is collected. Personal data is considered any information that allows a user to be identified. This information may include: their first and last names, age, postal or email address, location, or IP address (non-exhaustive list) ;
- About the rights they have regarding this data ;
- About the person responsible for processing the personal data collected and processed ;
- About the recipients of this personal data ;
- About the website's cookie policy.

ARTICLE 2 : DEFINITIONS

- « Site Content » : elements of any nature published on the Site, whether or not protected by intellectual property rights, such as texts, images, designs, presentations, videos, diagrams, structures, databases, or software ;
- « Internet User » : any person connecting to the Site ;
- « Site » : website accessible at the URL **www.alternativestrategies.com**, as well as any subsites, mirror sites, portals, and URL variations thereof, where applicable.

ARTICLE 3 : PERSONS CONCERNED

Different types of users may use the Site's services, hereinafter referred to as « Users » :

- « Candidate Users » are individuals seeking employment or wishing to use the online services offered by the Site. These individuals are invited to use the contact form: "Submit a CV" ;
- « Client Users » are individuals representing legal entities, or legal entities, seeking to recruit individuals seeking a career opportunity to fill a position within their company by conducting recruitment interviews ;
- « "Client Users" » are individuals seeking coaching-type support.

Users agree to provide accurate information and regularly update their information. Candidate Users who have provided their contact information on the **Alternative Strategies** website agree to be contacted by mail, email, telephone, or via their digital identity on social media by **Alternative Strategies** employees, for the purpose of exploring potential employment opportunities with them.

This policy supplements the Legal Notices and General Terms of Use, which are freely available to users. The Legal Notices and General Terms of Use are available under the "Legal Notices" and "General Terms" sections, respectively.

ARTICLE 4 : PRINCIPLES RELATING TO THE COLLECTION AND PROCESSING OF PERSONAL DATA

In accordance with Article 5 of European Regulation 2016/679, personal data are :

- Processed lawfully, fairly, and transparently with respect to the data subject ;
- Collected for specific, explicit, and legitimate purposes (see Article 3.1 hereof), and not further processed in a manner incompatible with those purposes ;
- Adequate, relevant, and limited to what is necessary for the purposes for which they are processed ;
- Accurate and, where necessary, kept up to date. All reasonable steps must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is deleted or rectified without delay ;
- Kept in a form that permits identification of the data subject for no longer than is necessary for the purposes for which they are processed ;
- Processed in a manner that ensures appropriate security of the collected data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

Processing is lawful only if and to the extent that at least one of the following conditions is met :

- The data subject has consented to the processing of their personal data for one or more specific purposes ;
- Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract ;
- Processing is necessary for compliance with a legal obligation to which the controller is subject ;
- Processing is necessary to protect the vital interests of the data subject or of another natural person ;

- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller ;
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

ARTICLE 5 : CONSENT

By using the **Alternative Strategies** website, users consent to :

- All the terms and conditions included in this privacy policy ;
- The collection, use, and retention of the data listed in this privacy policy.

When requesting contact, you consent to the processing of your personal data for the following purposes only :

- Contact by **Alternative Strategies**.

Users agree to be contacted primarily by email or telephone by **Alternative Strategies** employees for the sole purpose of offering them free or paid services related to recruitment (free for Candidates; paid by Clients) or coaching (paid by Clients).

ARTICLE 6 : PERSONAL DATA COLLECTED AND PROCESSED DURING YOUR BROWSING

When browsing the Site, various personal data about users are collected.

Article 6.1 : Data Collected

When browsing the Site, you consent to **Alternative Strategies** collecting information relating to :

- your use of the Site ;
- the content you have viewed and clicked on ;
- your device and software environment ;
- your location data ;
- your connection data (times, pages viewed, IP address, etc.) ;
- the web pages visited before or after using the Site.

Article 6.2 : Data collected when using the contact form

Use of the contact form by the Internet user requires **Alternative Strategies** to collect the following personal data :

- Last name ;
- First name ;
- Email address ;
- Telephone number ;
- Name of your company ;
- Region.

Article 6.3 : Data Collected When Using the Resume Submission Form

Use of the resume submission form by the Internet user requires **Alternative Strategies** to collect the following personal data :

- Last name ;
- First name ;
- Email address ;
- Telephone number ;
- Position held ;
- Job market status: Student, Job Seeker, Employee ;
- Resume (including other standard information) ;
- Cover letter.

Article 6.4 : Data Collected During Resume Review and in Case of Express Interest

- Standard information generally included on resumes :
Age, Gender, Nationality, Marital Status, Postal Address, Diplomas, Experience, Interests, Sector of Activity, Skills, Location, etc.) ;
- Other standard documents that may be provided as part of a recruitment process :

Application letter, letters of reference or professional recommendation, certificate of good conduct, evaluations and test results, and work permit ;

- Information resulting from independent background checks :
Your current employment status and role ;
- Standard information exchanged during an interview :
Salary expectations (current or anticipated salary, current or required benefits), and any responses to screening questions submitted as part of a recruitment interview with **Alternative Strategies** during the application process. This information may be associated with your profile for contact purposes by end clients.
- Standard information and documents exchanged to finalize the recruitment process :
National identification numbers (social security number, copy of identity card and passport, copy of diplomas, and criminal record certificate bulletin No. 3 equivalent, in accordance with applicable laws) ;
- We may also collect or receive information about you from other sources, including to keep the contact information we already hold about you accurate and up-to-date, using publicly available sources.

No additional data will be collected without prior notice. Data collected for recruitment purposes will not be used for any other purpose.

ARTICLE 7 : PURPOSES OF DATA COLLECTION

Alternative Strategies may collect personal data about you, particularly for the following purposes :

- To enhance the profile of Candidate Users through CVs and exchanges, enabling them to position themselves on the job market in the most appropriate way possible, according to their wishes, experience, and/or skills ;
- To invite Recruitment Client Users to contact us ;
- To invite Coaching Client Users to contact us ;
- To measure and improve the quality of these Services ;
- To ensure the security of the Site ;
- To facilitate and improve navigation on the Site ;
- Statistics : We also use the data collected for research and statistical purposes.

The purposes of data collection can be defined as follows :

Article 7.1 : Purposes of Personal Data Collection and Browsing

Data collected during browsing is subject to automated processing for the purposes of :

- Ensuring and improving the security of the Site ;
- Developing, operating, improving, providing, and managing the Site ;
- Contextualizing and improving the User's experience ;
- Preventing any illicit or illegal activity ;
- Enforcing the terms and conditions of use of the Site.

Article 7.2 : Purposes of Data Collection and Contact Form

Data collected when using the contact form is subject to automated processing for the purposes of :

- Verifying the User's identity ;
- Communicating with the User ;
- Send information and contact Internet users, mainly by email and telephone.

Article 7.3 : Purposes of Data Collection and Resume Submission Form

The data collected when using the resume submission form is subject to non-automated processing for the following purposes :

- Communicating with the User ;
- Registering Users ;
- Managing applications ;
- Developing, operating, improving, providing, and managing the Site ;
- Sending information and contacting Users, including by email, telephone, and push notifications.

Article 7.4 : Data Recipients

The data collected may only be viewed by **Alternative Strategies** staff. As part of your job search, the external disclosure of your data will be limited to a limited number of potential employers to enable them to analyze the suitability of your skills and experience for internal vacancies and to organize interviews. Your data is never freely viewable by a third party.

Article 7.5 : Security and confidentiality of personal data

Personal data is stored securely, using current technology, in compliance with the provisions of the General Data Protection Regulation and applicable national legislation. We are committed to ensuring the security of your information. However, please keep in mind that the transmission of information via the Internet is not completely secure. Although we take all appropriate security measures to protect your data, we cannot guarantee the security of your data transmitted on our website or by email; any transmission is at your own risk. Personal data is stored securely, using current technology, in compliance with the provisions of the General Data Protection Regulation and applicable national legislation.

ARTICLE 8 : DATA CONTROLLER AND DATA PROTECTION OFFICER

Personal data is collected by **Alternative Strategies**. The controller of personal data is **Alternative Strategies**, which can be contacted as follows :

- By mail: Alternative Strategies, 2 Rue des Coteaux, B-101, 57070 Saint Julien Les Metz ;
- By email: rgpd@alternativestrategies.com

The contact details of the Data Protection Officer are as follows: The Data Protection Officer of **Alternative Strategies**, 2 Rue des Coteaux, B-101, 57070 Saint Julien Les Metz. To exercise your rights, you can contact us by email and send all questions and requests relating to the processing of your personal data to: rgpd@alternativestrategies.com

You may contact us at any time to withdraw your consent, without affecting the lawfulness of processing based on consent given before its withdrawal.

You also have the right at any time to request from the data controller access to your personal data, rectification or erasure of your personal data, or restriction of processing, or the right to object to processing and the right to data portability.

Alternative Strategies undertakes to respond to your request for access, rectification, or objection, or any other additional request for information, within a reasonable timeframe, which may not exceed one month from receipt of your request.

You also have the right to lodge a complaint with the supervisory authority. If you believe that **Alternative Strategies** is not complying with its obligations regarding your personal information, you may submit a complaint or request to the competent authority. In France, the competent authority is the CNIL, to which you can submit a request by following this link : <https://www.cnil.fr/fr/cnil-direct/question/adresser-une-reclamation-plainte-la-cnil-queles-conditions-et-comment>

ARTICLE 9 : USER RIGHTS REGARDING DATA COLLECTION AND PROCESSING

Any user affected by the processing of their personal data may exercise the following rights, pursuant to European Regulation 2016/679 and the French Data Protection Act (Law 78-17 of January 6, 1978) :

- Right of access : you may obtain information regarding the processing of your personal data and a copy of this personal data ;
- Right of rectification : if you believe your personal data is inaccurate or incomplete, you may request that this personal data be amended accordingly ;
- Right to erasure : you may request the erasure of your personal data, within the limits permitted by regulations ;
- Right to restriction of processing : you may request the restriction of the processing of your personal data ;
- Right to data portability, where this right is applicable, you have the right to have the personal data you have provided to us returned to you or, where technically feasible, to have it transferred to a third party ;
- Right to object : you may object to the processing of your personal data, for reasons relating to your particular situation. You have the absolute right to object to the processing of your personal data for commercial prospecting purposes, including profiling related to such prospecting ;
- Right to define guidelines regarding the retention, erasure, or communication of your personal data, applicable after your death ;
- Right to withdraw your consent : if you have given your consent to the processing of your personal data, you have the right to withdraw your consent at any time ;
- Right not to be subject to a decision based exclusively on an automated process ;
- Right to determine the fate of data after death ;

- Right to refer the matter to the competent supervisory authority (Article 77 of the GDPR).

In order for the data controller to comply with their request, the user may be required to provide certain information such as their first and last names, email address, and account, personal space, or subscriber number. **Visit the website cnil.fr for more information on your rights.**

ARTICLE 10 : COOKIE POLICY

A cookie is a file stored on a user's hard drive when they browse a website. This cookie allows us to better understand data about the user's browsing habits in order to provide them with a better user experience.

When you first visit the **Alternative Strategies** website, we may install cookies on your device. These cookies may be installed by us or by service providers operating on our behalf, and the information collected is used solely for our benefit. Cookies only allow us to :

- optimize your browsing experience and the operation of our services ;
- conduct studies and statistics about traffic to our site ;
- process your requests via the contact form.

You can configure your device to notify you each time a cookie is sent to you. You can also choose to disable all cookies. You can do this in your browser settings. If you disable cookies, you will no longer have access to certain features that enhance your customer experience, and some of our services will not function properly. In accordance with current legislation, cookies cannot be stored for more than 13 months.

Accepting the information banner or continuing to browse constitutes acceptance of our cookie policy. However, you can disable cookies at any time using the methods described below.

Disabling/enabling cookies through your browser :

There are several ways you can manage cookies and other tracking technologies. You can accept or reject cookies by changing your browser settings, or have your browser ask you to confirm before accepting a cookie from the websites you visit. Please note that if you choose to disable cookies completely, you may not be able to use all of our interactive features. If you use multiple computers in different locations, you will need to ensure that each browser is set to suit your preferences. You can delete all cookies that have been installed in your browser's cookie folder. Each browser offers different procedures for managing your settings. Click on one of the browser links below to view their guidelines :

- For Internet Explorer™: <http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies> ;
- For Safari™: <http://docs.info.apple.com/article.html?path=Safari/3.0/fr/9277.html> ;
- For Chrome™: <http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647> ;
- For Firefox™: <http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies> ;
- For Opera™: <http://help.opera.com/Windows/10.20/fr/cookies.html>

Please note that Deleting cookies necessary for proper functioning will result in impaired use of the site. You can learn more about cookies and their general functions by visiting an information site such as allaboutcookies.org.

Example of functional cookies: These cookies are necessary to ensure the optimal functioning of the site and are therefore permanently activated. They include cookies that remember your visit to the site during a session or, if you wish, from session to session.

Example of statistical/performance cookies : These allow us to count visits and sources of traffic to our site, and to measure and improve its performance. They show us which pages are the most and least popular and how visitors move around the site. If you do not allow these cookies, we will not know when you have visited our site and will not be able to monitor its performance.

In accordance with the GDPR, you have the freedom to choose to be notified each time a cookie is created, or to completely disable the transmission of cookies by the site.

ARTICLE 11 : CONDITIONS FOR MODIFICATION OF THE PRIVACY POLICY

Alternative Strategies reserves the right to modify this Policy at any time to ensure its compliance with applicable law for users of the site.

Any modifications shall not affect commitments previously entered into on the site, which remain subject to the Policy in effect at the time of the commitment and as accepted by the user upon validation of the commitment.

The user is invited to review this Policy each time they use our services, without the need for a formal invitation, to be aware of any changes or updates made to the Privacy Policy.

ARTICLE 12 : APPLICATION SUBMISSION

The only recipients of your data are the **Alternative Strategies** recruitment staff and the recruitment staff of the potential employers approached. Your personal data (CV, cover letter, email) will be kept for a maximum of 2 years and will then be deleted. For any subsequent search mandate, you must resubmit all updated documents concerning you.

In accordance with the provisions of Article 6 of Regulation (EU) 2016/679 on data protection, when submitting an application, you consent to the processing of your personal data for the following purposes only :

- Collection of your contact details, skills, and experience, and assessment of the candidate's suitability for potential positions available with employers ;
- Creation of a candidate file in the **Alternative Strategies** CV database ;
- Organization of interviews with **Alternative Strategies** ;
- Transmission of your skills and experience to a limited number of potential employers in order to analyze their suitability for internal positions and organize interviews.

ARTICLE 13 : COMMITMENT

Alternative Strategies undertakes to ensure that among all personal data made available, some that may fall within a specific category of sensitive data under applicable data protection laws (including personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning the health or sex life of the natural person, or sexual orientation), this type of non-value-added data is neither considered nor recorded, and that the data medium is immediately deleted.

Alternative Strategies will never ask you to provide such information.