

# Information on the collection of personal data in accordance with Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR) for applicants

## 1. Responsible person and contact details

This information applies to the respective, but not jointly, responsible parties (Sanden):

Sanden International (Europe) GmbH, Am Taubenbaum 35-37, D - 61231 Bad Nauheim, Tel.: + 49 6032 8030 0.

Sanden Manufacturing Poland Sp. z o.o., ul. Fabryczna 11, 59-101 Polkowice, woj. dolnośląskie, Poland, tel. +48 (76) 72 49 114

Sanden Manufacturing Europe, Le Quilliou, 35190 Tinténiac, Tel : 02 99 45 58 58

You can contact the data protection officer of Sanden International (Europe) GmbH, Mr. Dipl.-Ing. Jörg Hagen, Jhcon Datenschutzberatung, Königstraße 50a, 30175 Hannover, Germany, by e-mail: [info@jhcon.de](mailto:info@jhcon.de).

If you have any questions about personnel and applicant issues, please use the e-mail address: [sie-hr@g-sanden.com](mailto:sie-hr@g-sanden.com) and if you have any questions about data protection, please either use [sie-dataprivacy@g-sanden.com](mailto:sie-dataprivacy@g-sanden.com) or contact the data protection officer directly.

## 2. Data and its origin

In principle, every application is processed via our applicant portal of the service provider SmartRecruiters. Additional information on data protection for applicants by SmartRecruiters can be found here: <https://www.smartrecruiters.com/legal/candidate-privacy-policy/august-13-2020/>

We process personal data that we have received from you as part of the application process. The following personal data is essentially processed:

- Surname, first name, etc.
- Contact details (private address, (mobile) telephone number, e-mail address)
- Application documents (cover letter, certificates, questionnaires, interviews, qualifications and previous activities, earliest possible starting date, salary expectations).

## 3. Data processing - purposes and legal bases

Your personal data will be processed in connection with your application procedure to the extent necessary to decide on the establishment of an employment relationship. The basis for this is Art. 6 para. 1 lit. b GDPR.

We also process your account with, for example, unsolicited applications and applications that are only stored for later consideration by the controller in order to contact you and to inform you about vacancies (including within the Sanden Group) on the basis of your consent in accordance with Art. 6 para. 1 lit. a GDPR and Section 26 para. 2 BDSG.

Anonymization for statistical purposes and their evaluation is carried out on the basis of Art. 6 para. 1 lit. f GDPR and enables us to obtain information about the job market and our applicants and to adapt our job advertisements to the conditions in the market.

In order to implement the status of an authorized economic operator (AEO) in accordance with Article 76 of the Customs Code (Regulation (EEC) No. 2913/92) and Article 253 et seq. of the Customs Code (Regulation (EEC) No. 2454/93) and/or in compliance with the EU regulations on combating terrorism (EC 881/2002 and 2580/2001), random checks are carried out at irregular intervals to determine whether you are suspected of being a terrorist.

## 4. Data recipient

We do not pass on your data to unauthorized third parties.

However, data will be passed on to internal departments involved in the application process to the extent necessary:

- Processor SmartRecruiters <https://www.smartrecruiters.com/legal/general-privacy-policy/>
- Personnel managers
- Management
- Departments involved
- Other companies in the Sanden Group, if your application is of interest to them.

## 5. Third country transfer or transfer to international organizations

The transfer of your data to a third country or international organizations is generally not intended. However, the processor SmartRecruiters, Inc. represented by Michael DeSimone (CEO), 166 Geary St, San Francisco CA 94108 USA, phone: + 1-415-508-3755, e-mail: [info@smartrecruiters.com](mailto:info@smartrecruiters.com) is based in the USA. However, the servers for European users of Smart Recruiters are located in Europe. The necessary contracts have also been concluded with SmartRecruiters, Inc. for the possible transfer of data to third countries. In addition, SmartRecruiters, Inc. is EU-US Data Privacy Framework certified and thus demonstrates an adequate level of data protection. <https://www.dataprivacyframework.gov/list>.

Within the Sanden group of companies, data may also be shared outside the EU for statistical purposes.

## 6. Storage duration of your data

As a rule, application documents are deleted after 6 months following expiry of the objection periods under the General Equal Opportunities Act (AGG). Only applications for which you have given your consent will be kept for longer so that they can be considered for subsequent vacancies and you can be informed about new positions. Deletion takes place when you delete your account in the applicant portal.

Applications from accepted applicants are automatically deleted 1 year after transfer to the personnel management system due to Sanden's legitimate interests in statistical evaluations.

Incomplete applications for which there is no final confirmation of consent to processing are automatically deleted after 30 days.

## 7. Your rights

You have the right vis-à-vis Sanden International (Europe) GmbH to:

- Information about your stored personal data (Art. 15 GDPR)
- Correction of data if it is incorrect, outdated or otherwise inaccurate (Art. 16 GDPR)
- erasure if the storage is unlawful, the purpose of the processing is fulfilled and the storage is therefore no longer necessary or you withdraw your consent to the processing of certain personal data (Art. 17 GDPR)
- Restriction of processing if one of the conditions listed in Art. 18 para. 1 lit. a) to d) GDPR is met
- Data portability of the personal data provided concerning you (Art. 20 GDPR)
- Withdrawal of a given consent, whereby the withdrawal does not affect the lawfulness of the processing carried out up to that point on the basis of the consent (Art. 7 para. 3 GDPR)
- Complaint to a supervisory authority (Art. 77 GDPR).

## 8. Possibilities of objection

If you have given your consent to the processing of your data (Art. 6 para. 1 lit. a or Art. 9 para. 2 lit. a) GDPR, you have the right to withdraw this consent at any time.

You can also object to other processing operations that we base on a legitimate interest within the meaning of Art. 6 para. 1 lit. f) GDPR at any time in accordance with Art. 21 GDPR for reasons arising from your particular situation, stating these reasons. In the event of a justified objection, we will generally no longer process the personal data for the purposes in question and delete the data

unless we can prove compelling reasons for the processing that outweigh your interests, rights and freedoms or the processing serves to assert, exercise or defend legal claims.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defense of legal claims.

For concerns of this kind, please contact the respective responsible persons mentioned above or delete your account in the applicant portal.

## **9. Requirement to provide the personal data**

The information you provide is essential for the application process. Without your information, the application procedure cannot be carried out properly, which may lead to exclusion from the procedure.

Status: February 2024