

# DATA PROTECTION FACT SHEET FOR SUBSCRIBERS AND APPLICANTS (IN ACCORDANCE WITH ARTICLE 13 AND 14 GDPR)

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Dear Subscriber,

Dear Applicant,

The protection and safety of your personal data is important to us. In accordance with our obligations from the European General Data Protection Regulation (GDPR) we provide you with an overview of why we record your data throughout the application process and how it is processed.

## 1. Who is responsible for the data processing and whom can I contact if I have questions?

The Greiner company that advertised the role is responsible for data processing during the **selection and application process**.

For questions related to the processing of your data, please contact the HR representative of the company that you applied to. An overview can be found [here](#).

For **speculative applications**, whichever Greiner company that you applied to is responsible.

For questions related to the processing of your data, please contact the representative listed in the table which you will also find in the confirmation email following your application.

Greiner AG is responsible for data processing as part of the **job subscription** service offering. You may also unsubscribe at any time in the SelfService menu.

The Greiner company also remains responsible when commissioning tasks to third parties ([see point 3](#)).

## 2. Processing scope

### 2.1 Which sources does the data come from and which types of data are processed?

We process personal data that we receive permissibly as part of the application process from you, third parties authorised to transfer data to us (e.g. recruitment consultants and personnel service providers) and, on rare occasions, publicly-accessible sources (e.g. the telephone book and media).

Personal data includes in particular your identity details (name, birthday and nationality etc.), private contact details and all application documents. In addition, we also record your personal data as processing results which we generate ourselves.

As part of the job subscription service, we only process data that comes from you.

### 2.2 For what purposes and upon which legal basis is my data processed throughout the application process?

#### 2.2.1 *Processing of voluntary information i.e. based on your (explicit) consent (Article 6(1)(a) and Article 9(2)(a) GDPR).*

As part of the **selection and application process** you voluntarily provide us with the following personal data. By submitting this data, you are consenting to the processing of the information as part of the selection and application process:

- Identity details (name, birthday, nationality etc.)
- Photograph
- Personal contact details such as address, telephone number and email address
- Socio-demographic details (marital status, details of military and community service etc.)

- Education information and language skills
- Test results, credentials and other qualifications
- Curriculum vitae and professional experience, details of special professional requirements
- Information regarding the desired position (job title or description, salary expectations, preferred start of employment etc.)
- Sources of information (where you found out about the company or the advertised position etc.)

For every application, your details will only be used by the company that you apply for and not be forwarded to other companies in our Group.

We may have to turn you down for the position that you applied for. We would love to keep your documents for future recruitment within the Group for up to a maximum of 12 months after receiving your application. If this is in your interest, we request your consent.

In the context of a **speculative application** you are consenting to multiple Greiner companies (limited to the country and sector you are interested in) using the submitted documents for up to 12 months in future selection and application processes.

In the event of an **application for an apprenticeship, you are consenting to your documents being able to be processed by all** Greiner companies who offer apprenticeships. If you are under the age of 16, you also confirm that your legal guardians (usually parents) consent.

#### **Job subscription service**

When setting up a job subscription, we process your user data based on your consent.

You are entitled to **revoke** your consent at any time without affecting the legality of any processing that took place prior to the revocation ([see point 4](#)).

#### *2.2.2 Processing to fulfil pre-contractual obligations (Article 6(1)(b) GDPR) and processing on the basis of our legitimate interests or third parties (Article 6(1)(f) GDPR) in the implementation of entrepreneurial freedom.*

As part of the selection process, i.e. until the conclusion of an employment relationship, in addition to the information listed in point 2.2.1., we also process the correspondence relating to your application and the selection process.

For selected positions, we use test systems for aptitude and personnel diagnostics in cooperation with partner companies and provide them with certain personal information to carry out the testing.

If you do not want this due to extenuating circumstances, you may **lodge an objection** against the processing.

#### *2.2.3 Processing in the case of (labour law) disputes (Article 6(1)(f) and Article 9(2)(f) GDPR).*

If there is a legal dispute during the application or recruitment process, the data required to enable the case to be prosecuted will be forwarded to legal representatives and the courts.

#### **2.3. Is provision of the data legally or contractually mandated or required to conclude a contract?**

Without the provision of certain personal details, we cannot/could not either carry out the application process or conclude a contract with you in the future.

### **3. Disclosure and foreign receipt**

#### **3.1. Who receives my data?**

In order to achieve the desired purposes, it may occasionally be necessary for us to transmit and disclose your data to recipients (other Group companies, authorities, public bodies, legal representatives, courts) or grant access to your data to cooperation partners, for example to carry out data management on our account, to use software and IT infrastructure or for support and maintenance purposes. Transmission of the data relevant to

the individual case takes place on the basis of (pre) contractual agreements, legal provisions or with your express consent.

We work solely with cooperation partners who provide reasonable guarantees that your data is in safe hands. The list of recipients and cooperation partners can be obtained from the contact person listed in the job advertisement.

### **3.2. Will data be transmitted to a third country or to an international organisation?**

Transmission to other Group companies in third countries can take place with your express consent. Transmission of your personal data takes place to cooperation partners based within the EU and in Switzerland, whereby the data protection level of Switzerland matches that of the EU due to a decision of adequacy.

### **3.3. For how long will my data be stored?**

As part of the entire application process, your data will be stored for as long as we can assert legal claims or have them asserted against us (within the applicable legal limitation periods) or as long as legal retention periods must be observed.

We store your data for longer, namely 12 months, based on your consent.

For the purposes of the job subscription service, we store your data indefinitely until you unsubscribe.

## **4. Rights of data subjects**

### **4.1. What data protection rights do I have?**

You have the right, at any time,

- to request information on which of your data we process (see Article 15 GDPR for details)
- to have your data rectified or deleted unless the legitimate interests of your employer in the processing outweigh this (see Article 16 GDPR for details)
- to limit the processing of your data (see Article 18 GDPR for details)
- to object to the data processing (see Article 21 GDPR for details)
- to object to the data processing (see Article 20 GDPR for details)

### **4.2. Can I revoke my consent?**

You are entitled to revoke your consent ([see point 2 – Consent](#)) at any time without affecting the legality of any processing that took place prior to the revocation. If you would like to revoke your consent, please contact the representative specified in the job advertisement or on the company's website.

### **4.3. Am I entitled to lodge a complaint with the supervisory authority?**

If, contrary to expectation, your data protection rights are violated, you are entitled to lodge a complaint with your country's data protection authority, in particular at your place of residence of work, or with another data protection authority within the EU. An overview can be found under [Data protection authorities](#).

### **4.4. Is there automatic decision making for recruitment, including profiling?**

There is no automatic decision making or decision based on profiling<sup>1</sup>.

### **4.5. Is data processed for other purposes?**

We only process your data for the purposes already listed above. As far as we intend further processing for other purposes, we will inform you about it separately.

For statistical purposes (e.g. reporting) your data is only processed anonymously, thus no conclusions can be drawn about your identity.

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<sup>1</sup> The definition of "profiling" can be found in Article 4.4 GDPR (<http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679&from=DE>).

With this fact sheet we hope to have given you clarity about how and why we process your data. If you still have questions regarding the processing of your data, please contact the representative in [point 1](#).

## 5. List of recipients and cooperation partners

Partner/Recipient	Registered Office (Country)	Basis for Transmission to a Third Country
Legal representatives		Legitimate interest
Courts		Prosecution of legal claims
Greiner AG (Group parent company) as the provider of central (IT) services	Austria	Within the EEA
Sector parent companies as the providers of central (IT) services	Austria	Within the EEA
Sector parent company as the provider of central (IT) services	Austria	Within the EEA
Security software and maintenance service provider	Germany	Within the EEA
HR software service provider	EU, Switzerland, India, USA	Within the EEA, data protection adequacy regulation; USA: Privacy Shield certified as well as standard contract clauses

## 6. Consent

By offering your consent during the application process, you are declaring that you have read and understood the data protection policy. Furthermore, you agree that, in the event of

### 6.1 An application for a specific job vacancy

any personal information you choose to provide on the contact form or in other types of documentation shall be used and processed by the company to which you have submitted your application within the scope of the application procedure itself and, in addition, for the purpose of providing evidence and statistics for a period of one (1) year. A corresponding overview can be found [here](#).

It may be necessary to issue you with a rejection letter for the position to which you applied. We would be happy to keep your documents on file for any future appointments within the group of companies up to a maximum of 12 months after the submission of your original application. Should this also be of interest to you, we shall then request your corresponding consent.

You may revoke your consent at any time using the [Self Service](#) function. Until the point in time of said revocation, the processing of your data shall remain lawful. Unfortunately, however, we shall not be able to accept your application without your consent to the processing of your personal data.

### 6.2 An unsolicited application

any information provided on the contact form that renders you personally identifiable, as well as data from any other documentation, shall be used and processed by all companies within the division (in the country) to which you have applied, for future application and selection purposes for a period of one (1) year following receipt of said documentation. A corresponding overview can be found [here](#).

It may be necessary to issue you with a rejection letter. We would be happy to keep your documents on file for any future appointments within the group of companies up to a maximum of 12 months after the submission of your original application. Should this also be of interest to you, we shall then request your corresponding consent.

You may revoke your consent at any time using the [Self Service](#) function. Until the point in time of said revocation, the processing of your data shall remain lawful. Unfortunately, however, we shall not be able to accept your application without your consent to the processing of your personal data.

### **6.3. The transmission of your personal data by email, post or in person, including via third parties (e.g.: HR Consultants)**

your personal information (as submitted in full compliance with the law by an HR Consultant or recruitment services provider), shall be used and processed throughout the application and selection procedure by the company to which your application was submitted (or which issued the original recruitment mandate), for a period of one (1) year. A corresponding overview can be found [here](#).

It may be necessary to issue you with a rejection letter for the position to which you applied. We would be happy to keep your documents on file for any future appointments within the group of companies up to a maximum of 12 months after the submission of your original application. Should this also be of interest to you, we shall then request your corresponding consent.

You may withdraw your consent at any time using the Self Service function, or by sending an email to the company that received your application from the HR Consultant or [recruitment services provider](#). Until the point in time of said revocation, the processing of your data shall remain lawful. Unfortunately, however, we shall not be able to accept your application without your consent to the processing of your personal data.

### **6.4. Your subscription to a job vacancies notification service**

your personal information as provided when submitting your application form to the job vacancies notification service shall be used and processed by Greiner AG in line with your specified area of interest. You may revoke your consent at any time using the Self Service (Link) function or by sending an email. Until the point in time of said revocation, the processing of your data shall remain lawful.

### **6.5 A trial date booking for apprentices**

any personal information you choose to provide on the contact form or in other types of documentation shall be used by Greiner Next Generation GmbH for a period of two (2) years within the scope of organising and arranging a trial date, as well as for the purpose of providing evidence and statistics. A corresponding overview can be found [here](#).

We would be happy to keep your documents on file for any future apprenticeship appointments within the group of companies up to a maximum of 24 months after the submission of your original application. Should this also be of interest to you, we shall then request your corresponding consent.

You may revoke your consent at any time using the Self Service function or by sending an email. Until the point in time of said revocation, the processing of your data shall remain lawful. Unfortunately, however, we shall not be able to accept your application for a trial date without your consent to the processing of your personal data.

### **6.6 Your application as a Greiner employee (internal application)**

any personal information you choose to provide on the contact form or in other types of documentation shall be used and processed by the company to which you have submitted your application within the scope of the application procedure itself and, in addition, for the purpose of providing evidence and statistics for a period of two (2) years. A corresponding overview can be found [here](#).

It may be necessary to issue you with a rejection letter for the position to which you applied. We would be happy to keep your documents on file for any future appointments within the group of companies up to a maximum of 24 months after the submission of your original application. Should this also be of interest to you, we shall then request your corresponding consent.

You may revoke your consent at any time using the Self Service function or by sending an email. Until the point in time of said revocation, the processing of your data shall remain lawful. Unfortunately, however, we shall not be able to accept your application without your consent to the processing of your personal data.