

# Processing of personal data of job applicants

The following privacy information applies to you if you are interested in working for one of the Aricoma Group companies, if you respond to a job posting on aricoma.com or through one of the job portals, or if you have expressed your interest in working at an event attended or organised by one of the Aricoma Group companies.

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## Controller of your data

All Aricoma companies are jointly the controller of your data. We are joint controllers because we handle this agenda as uniformly and collectively as possible. We work together on the basis of a written contract which has the following essential elements:

- The exercise of the rights of the subjects will be possible through the contacts of one of the controllers in the section „What are your rights”.
- The obligation to provide information will be performed jointly by all controllers

## The purposes of processing your data

We process your personal data to the extent necessary for the purposes of:

- Recruitment. We process your data to determine whether you are a qualified candidate for the position that you are applying for.
- Dispute resolution. We may process personal data to resolve disputes, complaints or legal proceedings.
- Regulatory Compliance. We may need to process your personal data to comply with the law or to comply with a court order.
- Professional history checks. Due to our historical experience, we have an obligation and interest to verify the authenticity of the documents that you submit.
- Registering job applicants. If you provide us with your consent, we will keep your information on our register of job applicants and will contact you if we open a position for which you are a suitable candidate.



## Legal basis for processing your data

We base many of our recruitment activities on our legitimate interests, which primarily include the recruitment of a suitable candidate for the position to be filled. The legal basis for processing the data of successful candidates is the implementation of pre-contractual measures. We do not use your data to fulfil our statutory and other legal obligations in this area, but your data may appear, for example, in the context of registration obligations. In some cases, we may also ask you to provide a consent with the processing of your personal data.

## Your data that we process

If you are applying for a job with us, we will obtain the following information from you:

- Contact details: for example, your name, surname, degree, permanent address, temporary address, private email address, phone number
- Information from your CV: for example, your previous employment, education, skills, language skills and any other information you choose to include on your CV
- Cover letter: any information you choose to include in your cover letter.
- Eligibility for work: you may need to provide evidence that you are legally eligible for employment with us, e.g., education, language skills, medical eligibility for selected types of positions
- Statement of clean criminal records: depending on the nature of the job and the country concerned, we may ask you to provide a statement or document confirming that you have not been convicted of any crime or offence that would disqualify you for the position.

In addition, depending on the position for which you are applying, we may also obtain information from third parties:

- Internal Applications. If you are already employed by Aricoma and are applying for an internal position, we may use information from your personnel file to supplement the information you provide when you apply for the job position.
- Assessment: we may ask you to undergo an assessment of your skills, personality or cognitive abilities. Such assessments are usually conducted using third-party software or through a third party who will provide the results to us, such as an assessment centre. We will provide you with additional information relating to your particular situation before conducting such an assessment.
- References. We may choose to obtain references from individuals who have worked with you in the past; we will only contact these individuals if you provide us with their names and contact information. If you are already employed by an Aricoma Group company, we may ask for references from your supervisor and/or co-workers, even without your knowledge.

In the event that you are successful in the recruitment process and are selected for the position to be filled, we will obtain the following information from you in addition to the above personal data in order to carry out the pre-contractual measures:

- Personal data: e.g., date of birth, surname at birth, ID card number or other identity documents, birth number, marital status, nationality, photograph, work permit.
- Information about family members: e.g., name, surname, degree, date of birth of husband, wife, name, surname, degree, date of birth, birth number of your children
- Information relating to remuneration, pension and health insurance and other benefits: e.g., name of health insurance company, old-age insurance, pension scheme, name of the bank and account number, deductions from wages/salary
- Information from the employment report and employment certificate



We will only process specific categories of personal data for purposes that are strictly related to the proper performance of our duties as your prospective employer and to the extent permitted or required by applicable law. We will process the following specific categories of personal data:

- Data relating to your health (certificates of disability and handicap of the employee, results of initial and preventive medical examinations in relation to work, data on mental health and medical fitness for work),
- Criminal record extract for selected positions, such as handling of entrusted funds, cash, etc.
- Verification of social networks, former employers, authentication of documents submitted by the applicant (ascertaining the existence of institutions that issued the documents submitted by the applicant).

## Recipients of your data

Controllers share your personal data between them. Your personal data may be transferred to KKCG group companies, in particular to the companies listed on <https://kkcg.com/cs/business>.

The data will only be accessible to our authorised personnel if the employee is bound by a duty of confidentiality.

We may share your data with other third parties who act on our behalf, such as providers of advertising, consultancy services, occupational health services, payroll accounting bodies, professional consultants and advisers who are bound by statutory and/or contractual obligations of confidentiality; recruitment agencies; systems management companies (e.g., jobseeker management system) and their subcontractors.

If we obtain information from third parties (as set out above), we will provide them with your name and other such information as it is necessary for them to provide us with relevant information about you.

In such cases, these third parties may only use your information for the purposes described above and only in accordance with our instructions.

Your personal data may be disclosed to government authorities (Police, courts, Tax Office etc.) to exercise their lawful powers under certain conditions.

## Duration of storage of your data

We process your personal data for the duration of the recruitment process. After that, we may retain some basic data (e.g., email communications) only for as long as necessary to protect our rights and interests. We will process CVs that you have concurred to for 3 years from the date of consent.

## What are your rights

Under the GDPR, you have certain rights in relation to the processing of your data. Here is a list of these rights and what each individual right means to you.

- **Right to access** - You have the right to a copy of the personal data we maintain about you and some details about how we use it. Your information will usually be provided to you electronically, or if you have made a request in writing, the information will be provided to you in writing wherever possible.
- **Right to repair** - We take reasonable steps to ensure accuracy and completeness of the information we keep about you. It is important that we have the correct information about you and we ask you to inform us if any of your personal information is incorrect, for example if you have changed your name or delivery address.



- **Right to erasure** - Under certain circumstances, you have the right to ask us to delete your data, for example when the data we have collected is no longer necessary for the original purpose, when we have processed the data for longer than strictly necessary, or when you withdraw your consent. We may have legal and regulatory obligations that prevent us from complying with your request, for example, if we are required to keep data in the accounting records.
- **Right to restrict processing** - under certain circumstances, you may ask us to stop using your data, for example if you believe that the data, we hold about you may be inaccurate or if you believe that we no longer need to use your data. From the point at which you have requested that we correct your Personal Data, or where you have objected to processing, and until we are able to investigate the problem or confirm the accuracy of your Personal Data (or amend it as you instruct), you have the right to restrict processing. This means that we will only retain and further process your data in accordance with your consent where it is necessary in connection with legal claims, to protect the rights of another or where there is a significant public interest in the processing. You can also ask us to restrict the processing of your personal data if the processing is unlawful but you do not want us to delete the personal data.
- **Right to data portability** - you have the right to ask us to transfer the data that you have provided to us on the basis of your consent or for the purpose of concluding or performing a contract. You may request the transfer of the data to a third party of your choice and we will readily comply if technically possible.
- **Right to object** - you have the right to object to processing on the basis of our legitimate interests. If we do not have sufficient legitimate grounds for processing when you object, we will not process your data further.
- **Right to withdraw consent** - in most cases, we do not process your data on the basis of your consent. However, in certain cases we may ask you for your approval. Where we process your data for which you have given consent, you are entitled to withdraw that permission at any time. If you wish to withdraw consent to processing and there is no other legal basis for processing your data, you have the right to erasure or restriction of processing.

You can exercise your rights by sending a written request by post to one of our [sales offices](#) or by sending an electronic request to [gdpr@aricoma.com](mailto:gdpr@aricoma.com). If you believe that the processing of your data is not in order, you can file a complaint with the Data Protection Authority. If you have any questions, please email us at [gdpr@aricoma.com](mailto:gdpr@aricoma.com).

