

Data Protection Information for Applicants

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A. Application Process

1. General Information

Von Roll takes the protection of your personal data and compliance with the statutory provisions on data protection very seriously. Below we would like to inform you pursuant to the EU General Data Protection Regulation (hereinafter also referred to as “GDPR”) how your personal data is being processed during the application process and which rights you have.

2. Name and Contact Details of the Controller

The company of the Von Roll Group for whose advertised position you are applying is responsible under data protection law.

The contact details of the Von Roll Group companies involved are as follows:

Von Roll Holding AG
Passwangstrasse 20

4226 Breitenbach
Switzerland

Von Roll Management AG
Passwangstrasse 20
4226 Breitenbach
Switzerland

Von Roll Schweiz AG
Passwangstrasse 20
4226 Breitenbach
Switzerland

Von Roll Deutschland GmbH
Theodor-Sachs-Str. 1
86199 Augsburg
Switzerland

Von Roll Deutschland Holding GmbH
Theodor-Sachs-Str. 1
86199 Augsburg
Germany

Von Roll Automotive GmbH
Theodor-Sachs-Str. 1
86199 Augsburg
Germany

Von Roll UK Ltd.
42 Wharfedale Road, Euroway Estate
West Yorkshire BD4 6SG Bradford
Great Britain

Von Roll Italia S.r.l.
Via Rigolfo 73 – Zona Vadò
10028 Trofarello (TO)
Italy

Valdoie Mica SAS
5, avenue Charpentier
90300 Valdoie
France

Von Roll France SA
145, rue de la République, BP 128
69883 Meyzieu Cedex
France

3. Data Protection Officer

Von Roll Deutschland GmbH has appointed a data protection officer. You can reach the data protection officer at the following contact details:

Von Roll Deutschland GmbH
Datenschutzbeauftragter
Theodor-Sachs-Str. 1
86199 Augsburg
E-Mail: dsb@vonroll.com

4. Processing of Your Personal Data

As part of the application process, we process the following categories of personal data (hereinafter also referred to as "application data") for the purpose of deciding on the establishment of an employment relationship with you:

- Master data (for example, name, date of birth, nationality, residence),
- Communication data (e.g. e-mail address, telephone number)
- Curriculum vitae (e.g. school education, training, work experience, qualifications and skills)
- Certificates (e.g. school report, training certificate, employer's reference, advanced training certificate)
- Other documents (e.g. cover letter, motivation letter)
- Employment or company-related data from the profiles of a business and employment-oriented social networks (e.g. LinkedIn, Xing)

If you wish to use our application portal, we process your login credentials to the application portal.

If you open a new account on our application portal via your Xing account or via your LinkedIn account or establish a connection to an existing account on our application portal, we process the personal data stored there (i.e. your basic profile information including your name, e-mail address, photos, profile slogans and your current position). We use this information to prefill or update your account on our application platform.

If we reimburse you for travel expenses after completion of the application process, we will process the data required for travel expense accounting (e.g. distance travelled, bank details) for this purpose.

The legal basis for the processing activities referred to above is in principle Art. 6 (1) s. 1 lit. (b) alt. 2 GDPR (implementation of pre-contractual measures). In individual cases, the processing may also be based on Art. 6 (1) s. 1 lit. (f) GDPR (safeguarding legitimate interests) if the processing is not necessary for the purpose of a decision on the establishment of an employment contract with you, but in the interest of a proper and efficient processing of your application.

If your application is successful and leads to the conclusion of an employment contract, the application data may be processed to the extent necessary for the purposes of the employment relationship. The legal basis for this is Art. 6 (1) s. 1 lit. (a) alt. 1 GDPR (implementation of contracts).

You are not obliged to provide application data by law or contract. However, personal details may be required for the conclusion of an employment contract. If you do not provide any data, you may not be considered for an open position.

Please refrain from submitting data that fall into special categories of personal data (i.e. information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, health or sexual orientation) during the application process, unless required by law in individual cases.

5. Storage Periods

In principle, we delete personal data when the lawful purpose intended by their processing has been achieved, unless we are entitled or obliged to further processing. Such an obligation or entitlement can arise, for example, from tax and/or commercial law retention obligations or the safeguarding of legitimate interests.

In order to be able to examine possible claims in connection with the application process (such as under the EU Anti-Discrimination Directive (2000/43/EC)), we reserve the right to store your application data for a period of up to six months after the end of the application process. The actual storage period may vary due to locally applicable legal regulations. The legal basis for this is Art. 6 (1) s. 1 lit. (f) GDPR (safeguarding legitimate interests).

If you have voluntarily consented to the inclusion of your applicant data in the applicant pool, we will store your applicant data for a period of up to two years if your application is rejected. The legal basis for this is Art. 6 (1) s. 1 lit. (a) GDPR (consent).

6. Recipients of Your Personal Data

If you apply for a specific position, only the persons and positions involved in the application process for this position (e.g. line managers, personnel department, employee representatives, works council) have access to your application data. Due to the matrix structure of the Von Roll Group, these persons and positions may also be located in a company other than the one that advertised the position. The legal basis for this is Art. 6 (1) s. 1 lit. (b) alt. 2 GDPR (implementation of pre-contractual measures) and Art. 6 (1) s. 1 lit. (f) GDPR (safeguarding legitimate interests).

If you have voluntarily consented to the inclusion of your applicant data in the applicant pool, if your application is rejected, personnel departments and, if applicable, line managers of all Von Roll Group companies will have access to your application data in order to be able to consider your application data for other open positions if necessary. The legal basis for this is Art. 6 (1) s. 1 lit. (a) GDPR (consent).

We sometimes use external service providers (e.g. IT service providers) to support us in our tasks. Some of these external service providers also process personal data on our behalf as part of their service provision. Such processors shall in principle only have access to the personal data necessary for the performance of their specific tasks. Among other things, we ensure by means of a data processing agreement that the external service providers are aware of these obligations and that appropriate technical and organizational measures are taken to protect personal data.

7. Transfer of Your Personal Data to Third Countries

It is intended to transfer your application data to recipients based in countries outside the European Union (EU) or the European Economic Area (EEA), as the case may be. This might apply, for example, in connection with the inclusion of your application data in our applicant pool. If we transfer personal data to recipients in such a third country, this will only take place if the third country has been confirmed by the EU Commission to have an adequate level of data protection or if other appropriate data protection guarantees (e.g. binding internal company data protection rules, EU standard contract clauses or - in the case of recipients in the USA - compliance with the principles of the so-called "EU-US Privacy Shield") are in place. You can request a copy of these data protection guarantees using the contact details mentioned in section 2.

8. Note on Consents

If you have given your consent to the processing of your personal data, you can withdraw it at any time. The withdrawal shall not affect the lawfulness of the processing carried out on the basis of the consent up to the withdrawal.

9. Your Rights as a Data Subject

Articles 15 to 21 of the GDPR provide for the following rights for data subjects:

- Access right
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to data portability
- Right to object

As a registered user, you can access your application data via the application platform and correct, update or delete your profile at any time.

You have the right, for reasons arising from your particular situation, to object at any time to the processing of your personal data on the basis of Art. 6 (1) s. 1 lit. (e) GDPR (data processing in the public interest) and Art. 6 (1) s. 1 lit. (f) GDPR (safeguarding legitimate interests); this also applies to profiling based on this provision. If you file an objection, your personal data will no longer be processed unless we can prove compelling reasons for processing worthy of protection which outweigh your interests, rights and freedoms, or the processing serves the assertion, exercise or defense of legal claims.

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

Further information on your rights as a data subject is also available on the Commission's website at https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en.

10. No Automated Individual Decision-Making

In connection with the application process, there will be no automated individual decision-making - including profiling - which produces legal effects concerning you or similarly significantly affects you.

11. Definitions

The terms used in these data protection notices are to be based on the definitions in Art. 4 GDPR. Against this background, the following terms in particular are to be understood as follows (not exhaustively) in these data protection information:

- **'personal data'** means any information relating to an identified or identifiable natural person (hereinafter **"data subject"**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

- **'processing'** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **'profiling'** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;
- **'controller'** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **'processor'** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- **'recipient'** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- **'third party'** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
- **'consent'** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

12. Further data protection information

Further data protection information for users of our website as well as for customers, suppliers, service providers, sales representatives and visitors of our sites can be found at <https://www.vonrollgroup.com/en/legal-information/>.

B. Possibilities to Consent on the Application Portal

Consent to the addition of your application to the Von Roll Group's pool of applicants

If you agree to be added to the applicant pool when submitting the application on the application portal, you agree that your personal data (in particular first name, surname, e-mail, letter of

motivation if applicable, certificates if applicable, curriculum vitae if applicable) stored there may be included in the applicant pool of the Von Roll Group for a period of up to two years. Personnel departments of all companies of the Von Roll Group have access to the applicant pool in order to be able to consider applicants registered there for other open positions and, if necessary, to contact them by telephone or e-mail using the contact details provided for further application processes.

Your consent is voluntary and has no influence on the consideration of your person in the ongoing application process. You can withdraw your consent at any time to any company of the Von Roll Group with effect for all companies of the Von Roll Group. To exercise your right of withdrawal, for example you can send us an e-mail to dataprotection@vonroll.com . The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Please note that only applicants of legal age are eligible for participation in the Von Roll Group's pool of applicants.