

## Data protection information for applicants and the use of the online application portal

In accordance with the requirements of Articles 13 and 14 of the EU General Data Protection Regulation ("GDPR"), we hereby inform you about the processing of personal data ("data") provided by you as part of the application process and, if applicable, collected by us, and your rights in this regard. To ensure that you are fully informed about the processing of your personal data as part of the application process, please take note of the following information.

### 1 Responsible person & data protection officer

The online application portal is provided and operated by Brose Fahrzeugteile SE & Co. Kommanditgesellschaft, Coburg, Max-Brose-Straße 1, 96450 Coburg.

You have the choice of deciding which Brose company may access and process your personal data via the online application portal:

- If you have chosen to apply only for certain positions, your personal data will be passed on to the Brose company responsible for making the hiring decision
- If you have chosen to be considered for vacant positions worldwide, we will make your personal data available to recruiters at all Brose companies worldwide.

The responsible entity within the meaning of the GDPR is therefore, in addition to Brose Fahrzeugteile GmbH & Co. Kommanditgesellschaft, Coburg (Max-Brose-Straße 1, 96450 Coburg), which as the operator of the applicant portal initially receives all applications, the respective company of the Brose Group responsible for your application.

You can contact our data protection officer by mail at the above address or by e-mail at [datenschutz@brose.com](mailto:datenschutz@brose.com).

### 2 Data categories

As part of the application process, your master and contact data (e.g. name, address, e-mail address), application data (e.g. work experience, qualifications and skills, assessments), communication content (e.g. e-mail correspondence) and accounting data (e.g. reimbursement of travel expenses) are processed.

The following data is processed within the scope of using the online application portal:

- For the creation of the system access (account), name, e-mail address, country/region of residence are recorded.
- The candidate profile in the online application portal includes :

Category	Data
File attachments	Resume *, Additional documents, Cover letter
Person	Personal information: First name *, Last name *, Country of residence *, E-mail *, Phone number *, Address
Training	degree, main area of education, comments
Work experience	Start and end date of the assignment, company name, function, position, industry, location, comments
Language skills	Possibility to choose from a language catalog, proficiency, comments
Mobility	Region, duration, comments

- The applicant profile may include the following job-specific data:

Category	Data
How did you became aware of the positin	This information tells us how you became aware of the position.
Severe disability	This information is requested separately for each application and is voluntary with regard to the support mechanisms of SGB IX for people with a disability
Query for permanent positions	Earliest possible start date, salary requirement

All fields marked with an asterisk (\*) are mandatory fields in the application process This is also visible in the applicant portal.

### 3 Data processing, purposes and legal bases

#### 3.1 Online application

For the online application you need a system access (account). Required for the creation of the account are first and last name, e-mail address, password and country/region of residence. To make it as easy as possible for you to apply for different jobs, your account is valid for all online applications via the applicant portal.

In the next step, you can add further data to your account and thus complete the candidate profile. You can then use this candidate profile to apply for specific job postings and also participate in the candidate pool (see Section 3.3). If further specific data is requested as part of a concrete job posting, this data is stored in the so-called candidate profile and is only available for this job posting.

Your data will be processed for recruitment purposes. In the contractual initiation phase of an employment relationship, we as your potential employer have an interest in ensuring that you have the professional competence and personal suitability required for the vacant position. The scope of data processing, the course of the application procedure and the choice of means (e.g. telephone interview, assessment center, personal interview) depend on the requirements of the specific job advertisement. Other purposes include the involvement of the relevant employee representative body, the reimbursement of travel expenses, the fulfillment of legal obligations (e.g. under tax laws and the German Commercial Code) and the assertion and defense of legal claims.

The legal basis for the processing of your data is Art. 6 para. 1 lit. b) DSGVO, necessity for hiring decision and establishment of an employment contract. In addition, the local legal basis for processing applicant data applies if the country in which the controller is established has enacted one in accordance with Art. 88 (1) DSGVO (e.g. Germany: Section 26 (1) p. 1 BDSG). For voluntary information, the legal basis is your consent pursuant to Art. 6 para. 1 lit a) DSGVO. In individual cases, we also process your data pursuant to Art. 6 para. 1 lit. f) DSGVO (legitimate interest), insofar as this is necessary for the assertion and defense of legal claims as well as the group-internal data exchange for administrative purposes.

Insofar as special categories of personal data are processed pursuant to Art. 9 (1) DS-GVO, this serves the exercise of rights or the fulfillment of legal obligations under labor law, social security law and social protection law within the scope of the application procedure. This is done on the basis of Art. 9(2)(b) DSGVO. In addition, the processing of special categories of personal data may also be based on consent pursuant to Art. 9 (2) a) DSGVO.

### 3.2 Assessments and other tests

For some positions, we conduct assessments and other tests (e.g. work samples, personnel diagnostic procedures) in addition to the application process. These serve to get to know you better and to assess how well you fit the open position. In addition, for high-risk functions, such as senior management positions, security checks are conducted in the form of so-called pre-employment screenings to ensure careful selection. The results of the checks are always combined with other information from the application process (e.g. application documents, interview) and are never used on their own to make a decision.

Such checks are sometimes carried out by specialized external service providers. In this case, you will be informed about the relevant procedures and recipients as part of the recruitment process and before your data is transferred to third parties.

### 3.3 Candidate Pool

Independently of the individual online application, you have the opportunity to participate in the global candidate pool during registration. Participation in the candidate pool only takes place with your consent, which you can give during registration by selecting the option "All company recruiters worldwide". This consent allows all Brose recruiters to have access to your applicant profile in order to check it for adequate job postings. The object of this is exclusively your general profile information and explicitly not the job-specific requirements, provided that you are in the meantime in one or more application processes.

If there is an adequate job posting, you may be contacted by the recruiter responsible for it. Contacting us does not constitute an online application, so you are free to decide whether you want to apply. If an application is made, your data will be processed in accordance with section 3.1.

The legal basis for your participation in the candidate pool is consent in accordance with Art. 6 (1) a) DSGVO.

### 3.4 Applicant pool

By means of a separate declaration, you can consent to our including you in our applicant pool in the event of an unsuccessful application after completion of the respective application process. There is then the possibility that we will contact you again in the event of suitable vacancies. The legal basis for inclusion in the applicant pool is your consent in accordance with Art. 6 Para. 1 lit a) DSGVO.

### 3.5 Bring-a-Friend

Brose employees have the option of recommending vacancies to external people via the system.

Employees create a candidate profile for the potential applicant. You, as a potential applicant, will then receive an e-mail with a request to complete the registration and enter an application. The legal basis for the processing of your data is Art. 6 para. 1 lit. f) DSGVO. The legitimate interests lie in the acquisition of applicants and thus the filling of vacant positions.

### 3.6 Job Notification

You have the option of signing up for job notifications by selecting the appropriate option in your profile. In this case, you will receive information on current job postings by e-mail on a weekly basis as standard, initially based on the subject area of your (first) online application. You can define the frequency yourself. Via your profile settings, you can expand or change the content or unsubscribe from the notification at any time. Signing up for job notification is voluntary and does not affect registration or ongoing application processes. The legal basis for the job notifications is the consent according to Art. 6 para. 1 lit a) DSGVO.

### 3.7 Engagement of personnel consultants

We may also engage personnel consultants for the acquisition of suitable applicants. In this case, your applicant data will be transmitted to us either on the basis of your consent or on the basis of a contract between you and the personnel consultant. The transfer usually takes place electronically, i.e. via e-mail or by attaching your candidate profile. Up to and including the transmission, the personnel consultant is responsible for processing your data. After transmission to us, your data will be processed for the recruitment decision as previously described in section 3.1.

The purpose of hiring a personnel consultant is to find suitable applicants. In the event of recruitment, the personnel consultant receives a commission from us as the client. In this respect, your data will exceptionally also be processed for the calculation and payment of commissions. The legal basis for the processing of your data is Art. 6 para. 1 lit. b DSGVO, necessity for the implementation and execution of the placement contract.

## 4 Recipient categories

Which recipients are involved in the data processing and thus have access to your data depends on the requirements of the specific job posting.

Recipients typically include:

<b>Internal receivers</b>	<ul style="list-style-type: none"> <li>▪ Personnel department, esp. recruiter</li> <li>▪ Supervisor and other persons involved in the selection process (e.g. specialist managers, team members)</li> <li>▪ Employee representatives, such as works council and representatives of the severely disabled</li> <li>▪ Finance Department</li> </ul>
<b>Recipients within the Brose Group</b>	<ul style="list-style-type: none"> <li>▪ Other companies of the Brose Group in Germany and abroad that are responsible for fulfilling the purposes described above</li> <li>▪ All recruiters worldwide, provided you have agreed to be included in the candidate pool.</li> </ul>
<b>External recipients outside the Brose Group</b>	<ul style="list-style-type: none"> <li>▪ Processor according to Art. 28 DSGVO (esp. software provider for the provision and administration of the applicant portal)</li> <li>▪ Authorities and courts, insofar as necessary to comply with legal or official obligations or to assert or defend legal claims</li> <li>▪ Personnel consultants who are charged with the acquisition of applications</li> <li>▪ Banks</li> <li>▪ Providers for assessments and other examinations (see section 3.2)</li> </ul>

The recipients of your data may be located in other countries, including those outside the EU. In such cases, we take the necessary measures to ensure appropriate and adequate safeguards for the protection of your data (e.g. conclusion of the [EU standard contractual clauses](#)).

## 5 Storage duration

Your data will only be stored for as long as we need it to fulfill the above-mentioned purposes. As soon as processing of your data is no longer necessary or, in the case of consent, you revoke your consent, we will delete your data, subject to the provisions of Art. 17 (3) DSGVO.

The online application ends with the hiring decision and thus also the purpose of data processing for the specific application procedure. After expiration of the legal retention period, your application data will be deleted. The legal retention period depends on the applicable local law of the controller (e.g. in Germany: 6 months).

Your candidate profile will be automatically deleted after 6 months of inactivity. The period restarts each time you log in to your candidate profile. You will be informed about the deletion by e-mail in time and you have the possibility to extend the storage by using the candidate profile.

If the candidate profile was created by a third party (on behalf of the candidate) and you do not subsequently give your consent to the data processing, the data will be automatically deleted after 14 days.

In deviation from the above deadlines, the following deadlines apply to the countries in the table

Country	Application	Candidate profile (with consent)	Candidate profile (without consent)
Sweden	12 months	12 months	60 days
France	12 months	12 months	60 days
Serbia	12 months	12 months	14 days
Slovakia	48 months	48 months	60 days
Czech republic	24 months	24 months	30 days
Russia	1 month	1 month	30 days
Japan	12 months	12 months	30 days
Korea	6 months	6 months	90 days
Thailand	6 months	6 months	30 days
Canada	6 months	6 months	30 days
USA	6 months	6 months	30 days
Mexico	12 months	12 months	365 days
India			

## 6 Data subject rights

You have, if the legal requirements are met, the following rights to the extent provided by law:

- Right of access (Art. 15 DSGVO)
- Right to rectification / completion (Art. 16 DSGVO)
- Right to erasure (Art. 17 DSGVO)
- Right to restriction (Art. 18 DSGVO)
- Right to data transfer (Art. 20 DSGVO)

## 7 Right of complaint to the supervisory authority

You also have the right to file a complaint with a data protection supervisory authority.

## 8 Revocation of consent

If you have given us your consent for processing, you have the right to revoke the consent at any time without affecting the lawfulness of the processing carried out on the basis of the consent up to the revocation. You can revoke your consent to participate in the candidate pool and/or the interested party pool at any time with effect for the future by restricting access via your profile settings.

## **9 Obligation to provide the data / consequences of non-provision**

The provision of personal data in the context of application processes is neither legally nor contractually required. You are therefore not obliged to provide information about your personal data. Please note, however, that these are required for the decision on an application or the conclusion of a contract relating to an employment relationship with us. If you do not provide us with any personal data, we will not be able to make a decision regarding the establishment of an employment relationship.

Some information provided as part of the online application is voluntary and you are not required to provide this information. Voluntary information is marked by corresponding system notes.

If you do not give your consent for your application to be included in our applicant pool, this will not result in any disadvantages for the specific application process. However, we will then not be able to contact you about further job offers.

## **10 Automated decision making / profiling**

Since the decision on your application is not based exclusively on automated processing, no automated decision in individual cases within the meaning of Art. 22 DSGVO takes place.

## **11 Data source**

We receive your data primarily from you, e.g. from your application documents, your completed applicant profile. Some personal data is also generated by us, e.g. notes taken during interviews, or automatically from our IT systems, e.g. when you create your user account. In some cases, we also receive data about you from third parties, for example, as part of the implementation of the purposes described, such as

- Personnel consultants (see section 3.7)
- Brose employees within the scope of bring-a-friend (see item 3.5)
- Assessment providers (see section 3.2)
- publicly available sources, such as data from job-related social networks (e.g. LinkedIn, Xing).

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## **Notice of objection according to Art. 21 para. 4 DSGVO**

**You may object to processing based on Art. 6(1)(e) or (f) DSGVO on grounds relating to your particular situation (Art. 21). After the objection has been made, we will no longer process your data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the assertion, exercise or defense of legal claims.**