

# **Data Protection Information for Applicants**

according to Art. 13 DSGVO

We are pleased that you are interested in us and that you are applying or have applied for a position with AP&S International GmbH. This privacy policy informs you about how AP&S International GmbH processes your personal data when you apply for a job we have advertised or send us a speculative application.

This privacy information also describes your data protection rights, including the right to object to any part of the processing that AP&S International GmbH carries out. For more information about your rights and how you can exercise them, please see the section "What rights do I have in relation to my personal data?". This data protection statement applies in addition to our existing general data protection statement, which provides you with specific information on how we process your personal data when you visit our website or in the case of non-application-specific topics.

## 1. Responsible Person and Data Protection Officer

The person responsible (hereinafter simply referred to as the "company") for processing your personal data in the context of an application to all companies is:

AP&S International GmbH Obere Wiesen 9 78166 Donaueschingen Phone: +49 771 8983 0 E-mail: datenschutz.ap-s@bbcomsecure.de

If you have any questions about this privacy policy or would like to contact us for any reason in connection with the processing of your personal data, please contact our Human Resources Department at personal@ap-s.de or our data protection officer. You can reach him by mail at:

Wolfgang Homann c/o bbcom secure Deutschland GmbH Kanalstraße 2/1 88250 Weingarten E-Mail: datenschutz.ap-s@bbcomsecure.de

You can reach our data protection officer (Singapore) by mail or e-mail at: Sebastian Blasius
Luther LLP
4 Battery Road
Bank of China Building, #25-01 Singapur 049908

Email: sebastian.blasius@luther-lawfirm.com Tel.: +65 6408 8000

#### 2. What Information and Personal Data do we Process from you:

AP&S International GmbH collects and processes all data that you provide to us through your application, both in paper and in digital form (hereinafter referred to as "Applicant Data"). This includes:

- Your contact data, such as your name, address, telephone number and e-mail address
- Your application documents, such as your resume, cover letter, work experience, and previous employment history
- Information about your professional experience and skills, such as language skills, performance appraisals, educational credentials, and references



- Your photo if voluntarily added to the application
- Our notes from interviews with you and video interviews if applicable
- Your desired salary, the type of employment you are seeking and the available date
- In exceptional cases, your identification documents
- Driver's license data, if necessary for the performance of the job.

In addition, this includes any other data you submit to us, including any correspondence you have with us during the application process. We may also collect, store and process special categories of personal data such as health data if you provide it to us.

We may also obtain the above data about you from other sources. These include, for example, recruitment service providers, references you may provide to us, websites and other publicly available data on the Internet. This includes, for example, data that you yourself have obviously made public as part of an online profile and that is not of a purely private nature. We may also receive data that you transmit to us via third-party websites, e.g. from job exchanges. When collecting data from other sources, we naturally always comply with all legal requirements.

If you apply to our website via our online portal or to our job offers, we may collect access information, such as the IP address of your access device. You can find more information on this via our privacy policy on our website. Participation in online application procedures is voluntary. If you do not participate, you will not suffer any disadvantages in the application process.

We are looking for applicants regardless of race, ethnic origin, gender, religion or ideology, disability, age or sexual identity. We do not require any information from you that is not usable under the General Equal Treatment Act under German law or any other national or international equal treatment law. Please also do not pass on any confidential internal information or even trade secrets of your former or current employer.

If you are under the age of majority and have sent us an application, we assume that you have done so with the full consent of your legal guardian. If this is not the case, please inform us immediately.

In principle, the provision of your personal data as part of the application process is voluntary. However, the provision of personal data is necessary for the processing of your application or the conclusion of a contract for employment with us. This means that we cannot enter into an employment relationship with you if you do not provide us with any personal data during the application process.

### 3. Google Jobs

We structure our job advertisements on our website according to Google's specifications. Google independently searches websites for job advertisements, copies their data and displays them to users of its search engine when they enter the relevant search commands in the "Google Jobs" box. We have no influence on whether and when our job ads are displayed, nor according to which criteria and rules Google does this. If you access our website via Google Jobs, Google will probably collect personal data about your selection and assign it to your profile on Google. We have no influence on and no knowledge of what data Google collects from you in the process. You can find Google's data protection information at https://policies.google.com/privacy?hl=de&gl=de.

### 4. On what Legal Basis do we Process your Data?

The legal basis for the processing of your personal data in the application process is Article 6 para 1 lit b DSGVO and, if legally effective, Section 26 BDSG-neu. When collecting data about you,



possibly also from other sources, this is done on the legal basis of a legitimate interest pursuant to Article 6 para 1 lit f DSGVO. Our legitimate interest in this case is to gain a better profile of you from information that you have obviously made available to the public yourself according to Article 9 (2) (e) DSGVO.

Furthermore, we may process personal data about you to the extent necessary to defend asserted legal claims against us arising from the application process. The legal basis for this is Art. 6 (1) lit b and f. The legitimate interest here is, for example, a duty of proof on our part in proceedings under the General Equal Treatment Act (AGG).

If you have received an acceptance for a position as part of the application process, the data from the applicant data system will be transferred to our personnel information system. In this case, we can further process the personal data already received from you for the purposes of the employment relationship in accordance with Article 6 para 1 lit b DSGVO and, if legally effective, § 26 BDSG-neu.

If we are unable to offer you a current vacancy and if, based on your profile, we believe that your application could be of interest for future vacancies, we may ask you whether we may store your application data in our applicant management system for a further twelve months. This will only take place if you agree to this on the legal basis of your express consent in accordance with Art. 6 Para. 1 lit. a DSGVO. In this case, your data will then be deleted automatically after 12 months from your consent.

### 5 What Purpose do we Process your Data for?

The data you provide will be processed for the purpose of processing and reviewing your application and, if an employment relationship is established, also for the purpose of implementing the employment relationship. We collect and process your personal data in order to offer advertised positions and to carry out the selection process. Processing for any other purpose does not take place.

#### 6 Who Receives your Application Data?

Your application data is stored and processed by us by the persons entrusted with the application procedures. The data is stored in such a way that only a narrowly defined group of specially authorized persons is entitled to access it, and any other access or other knowledge of the data is excluded in accordance with the state of the art.

As a rule, your data will be processed in Germany.

Your applicant data will be processed within the personnel department and in the specialist department relevant to your application. Access to your personal data is always restricted to the group of persons who require the information for the performance of their duties.

If necessary, data processing companies that provide personnel services for us may also receive personal data insofar as this is necessary for the processing purposes. Processing is then carried out in accordance with our instructions (commissioned data processors). The data processing companies are contractually obligated to implement appropriate technical and organizational measures to protect their personal data and to process it only as contractually specified by us.

Personal data will also be disclosed to public authorities and/or law enforcement agencies if this is necessary for the above purposes, if required by law or if necessary to protect our legitimate interests in accordance with applicable laws.



#### 7. How Long is the Data stored?

Applicants' data will be deleted after 6 months following completion of the selection process. In the event that you have agreed to further storage of your personal data, we will retain your data in our applicant management system. There, the data will be deleted after 12 months.

If you have applied in paper form and received a rejection as part of the application process, your application documents will be destroyed in accordance with the above deadlines in line with data protection requirements.

## 8. What Rights do I Have with Regard to my Personal Data?

You can request information on the data stored about you at the addresses listed under point 1. In addition, you may, under certain conditions, request the correction or deletion of your data. You may also have the right to restrict the processing of your data and the right to demand that the data you have provided be returned to us in a structured, common and machine-readable format.

#### Right of Objection

If we process your data to protect legitimate interests, you may object to this processing on grounds relating to your particular situation. We will then no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Insofar as we have asked for your consent, you may revoke it at any time. If you wish to revoke your consent to the processing of your personal data by AP&S International GmbH, this will not affect any processing that has already taken place.

You have the option of contacting our data protection officer or a data protection supervisory authority with a complaint.

Status: Aug 2023