

Privacy Notice for Job Applicants

This privacy notice is to inform our job applicants of the processing of personal data and their rights under data protection law.

1. Who Is the Controller Responsible for Processing Your Personal Data?

Mi-Jack Europe GmbH

Unterreut 6

76135 Karlsruhe

Germany

Phone: +49 721 509 942-00

Email: info@mijackeu.com

If you have any questions about this information, you may contact our managing director Stephan Trauth. He may be contacted by mail, email or phone, in each case using the contact details provided above.

2. What Are the Sources and Types of Personal Data Processed by Us?

We process personal data provided to us by you in your application and within the recruitment process. Additionally, we may receive your personal data from third parties, such as recruiting or placement agencies, to whom you have provided your personal data for forwarding.

The types of personal data we process include, in particular, your basic data (e.g., name, nationality), contact data (e.g., address, telephone number, or email address), as well as other personal data from the application and the entire recruitment process (notably cover letters, resumes, certificates, questionnaires/interviews, information about your qualifications and previous employment).

Special categories of personal data (such as health data, ethnic origin, political affiliation, religious beliefs or affiliation, trade union membership, degree of disability, or sexual orientation) are **not needed** for processing your application. Please be aware that including your picture in the application may categorize it as special personal data if it reveals your ethnic origin or religious beliefs. We only use this data if you voluntarily provide it in the application or during the recruitment process and its use is justified by your consent or a statutory permission.

3. For What Purposes Will We Process Your Personal Data? What Is the Legal Basis for Such Processing?

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), and all other applicable laws, primarily to conduct and manage your application and recruiting process, and to assess your suitability for the relevant position. The processing of your personal data is carried out, in particular, on the following legal bases:

a. For the performance of a contract or to fulfill (pre-)contractual obligations (Art. 6 Para. 1 lit. b) GDPR in conjunction with Section 26(1) BDSG)

The processing of your personal data is necessary to decide on establishing an employment relationship for the position you applied for, or if no position is indicated in your application, for all open positions within Mi-Jack Europe GmbH or our affiliates (*i.e.*, group companies).

b. To pursue our legitimate interests (Art. 6 Para. 1 lit. f) GDPR)

Your personal data may be further processed for purposes of legitimate interests pursued by us or a third party, including making them available to our management holding or other affiliates or group companies working closely with us. Mi-Jack Europe GmbH is part of Lanco Group of Companies and as such may operate in organizational structures, such as so-called **matrix structures**, where disciplinary superior and functional superior are based within different group companies in multiple countries, or management functions are bundled within certain group companies. For example, if a position is advertised for the location of Mi-Jack Europe GmbH in Germany, your application documents may also be reviewed by a functional superior who is not based in Germany. Likewise, group companies providing management functions to Mi-Jack Europe GmbH, or are controlling general business processes, including IT, data and corporate security, may have access to it. Insofar these group companies act as processor within the meaning of the GDPR in performance of these functions, such as rendering IT support, we are designated as representative pursuant to Art. 27 Para. 1 GDPR. Therefore, and without prejudice to legal actions you may be able to initiate against them, you can address us with any issues related to the processing (see also below #8 and #9 for your data protection rights).

c. Based on your consent (Art. 6 Para. 1 lit. a) GDPR in conjunction with Section 26(2) BDSG)

The processing of your personal data may be based on you giving your consent for specific purposes. Such a consent results in the lawfulness of the processing. You may revoke your consent at any time. Revoking your consent applies only for the future and does not affect the lawfulness of any data processing until the revocation.

d. To comply with statutory obligations (Art. 6 Para. 1 lit. c) GDPR in conjunction with Section 26 BDSG)

Your personal data may also be processed to comply with our statutory obligations as potential employer or other statutory obligations to which we are subject. Such obligations may include the compliance with legal retention periods, control and reporting obligations, official orders and disclosure and transparency obligations.

e. With respect to processing of special categories of personal data (Art. 9 GDPR in conjunction with Section 22 Para. 1 No. 1b, Section 26 Para. 3 and Para. 4 BDSG)

We may further process special categories of personal data based on Art. 9 GDPR in conjunction with Section 22 Para. 1 No. 1b, Section 26 Para. 3 and Para. 4 BDSG or based on any consent obtained from you in accordance with Art. 9 Para. 2 lit. a) GDPR in conjunction with Section 26 Para. 2 BDSG.

4. Are You Obligated to Provide Your Personal Data?

You are not obliged to provide your personal data within the process of your application or during the recruitment process. However, certain personal data may be required by us to assess your suitability for a position. Without this relevant data, we may not be able to conduct the application or recruitment process and thus will not be able to decide on the conclusion of an employment relationship. Please note that this does not require you to provide personal data that falls within special categories of personal data (such as health data, ethnic origin, political affiliation, religious beliefs or affiliation, trade union membership, degree of disability, or sexual orientation).

5. What Categories of Recipients May Receive Your Personal Data From Us?

Within our company, the relevant persons and departments receive your personal data that require them to fulfill our contractual and statutory obligations or to pursue the purposes described above. Additionally, your personal data may also be passed on to third parties.

In detail:

- Internally: Your personal data may be disclosed to personnel involved in the application and recruiting process.
- Our group companies: We may disclose your personal data to our affiliates if required by our organizational structure to make hiring decisions, for example, insofar these decisions are made by management functions or your (future) functional superiors, or by and rendering certain group-wide functions (e.g., IT, data and corporate security).
- Recruitment agencies: We may disclose your personal information to recruitment agencies with whom you provided your personal information. if passing on your

personal data is required by our business operations, in particular, to comply with contractual or statutory obligations.

- Public authorities and institutions if we are obliged to provide your personal data by statutory law.
- Other third-parties if our business operations necessitate making accessible your personal data to them.

Any transfer of personal data to third-party recipients is made in accordance with the applicable data protection laws. Insofar as third-party recipients are located outside of the European Union, we comply with the applicable data protection laws by checking whether a transfer is permissible and ensure an appropriate level of data protection (see below #7).

6. How Long Do We Store Your Personal Data?

In principle, we store your personal data only for as long as required by the purposes and legitimate interests described in this privacy notice (e.g., during the recruitment process). In addition, we store your personal data for as long as we are required by statutory documentation and retention obligations which may exceed the relevant purpose of the processing. For example, in compliance with the recommendations of the competent data protection supervisory authority, we currently store your personal data in any event for a period of 4 months after a hiring decision has been made. Other statutory limitation periods may require us to store your personal data even longer. With respect to any consent granted by you to us to use your personal data, we will retain the personal data until the date indicated in the consent or until you object to its processing (any usage is confined to the purposes to which you consented). If you successfully pass the application and recruitment process, we will only retain personal data from your application that we are legally entitled to keep in our personnel files. All other personal data will be deleted. Similarly, any personal data we are no longer permitted to store will also be deleted.

7. How Do We Transmit Personal Data to Countries Outside of the European Union?

Within the limits of the purposes described in this privacy notice, we may transfer your personal data to recipients based in countries that are not part of the European Union. Such recipients may include group companies or other third parties. It is particularly of note that certain of our group companies are based in the United States of America.

Any transfer of personal data to recipients outside of the European Union is made in compliance with Art. 44 to 49 GDPR. Thereupon, your personal data may be transferred to recipients in non-European Union Member States for which the European Commission decided by adequacy decision that an adequate level of data protection exists in accordance with the standards of the European Union (e.g., Argentina, Canada, Israel, New Zealand,

Switzerland, Uruguay). With respect to the United States of America, the European Commission has issued an adequacy decision if the recipient takes part in the Data Privacy Framework program of the U.S. Department of Commerce. All other data transfers to recipients in non-European Member States, including the United States of America, require that data protection standards comparable to the European Union are otherwise sufficiently guaranteed, for example, by the conclusion of binding corporate rules or of the Standard Contractual Clauses provided by the European Commission.

We have adopted Standard Contractual Clauses with group companies for which no adequacy decision of the European Commission is applicable to ensure an adequate level of data protection. The agreements with service providers or other recipients for which no adequacy decision of the European Commission is applicable generally also provide for the conclusion of the Standard Contractual Clauses or other safeguards to ensure the adequate level of data protection. The Standard Contractual Clauses can be requested from us at info@mijackeu.com.

Finally, personal data can be transferred in certain cases to recipients based outside of the European Union on the basis of the exceptions for certain cases pursuant to Art. 49 GDPR.

8. What Are Your Data Protection Rights?

You have the right to obtain information about your personal data stored by us at any time. Upon presentation of the relevant requirements, you are also entitled to the following rights:

- **Right to rectification**: You have the right to rectify any inaccurate or incomplete personal data relating to you.
- **Right to erasure**: You can also request the erasure of your personal data, for example, if your personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- **Right to data portability**: Where we process your personal data for the performance of a contract with you or on the basis of your consent, you have the right to receive your personal data in a structured, commonly-used, machine-readable format, if and to the extent that you have provided us with the personal data.
- **Right to revoke consent**: You can revoke any consent you have given to us for the processing of your personal data at any time. The revocation of the consent does not affect the lawfulness of the processing carried out on the basis of the consent until its revocation.
- **RIGHT TO OBJECT**: You may object to our processing of your personal data on grounds relating to your particular situation. However, this only applies in cases

where we are processing your personal data for the purpose of pursuing legitimate interests or public interests. Upon you presenting the aforementioned grounds, we will no longer process your personal data, unless we can demonstrate compelling legitimate grounds which override your grounds.

In addition, you have the right to lodge a complaint with any competent supervisory authority for data protection (see below #9).

9. Would You Like to File a Complaint About How Your Personal Data is Being Handled?

You have the right to file a complaint with any competent supervisory authority for data protection at any time, for example, with the one named below. The right to file a complaint exists without prejudice to any other administrative or judicial remedy.

The following supervisory authority for data protection is responsible for us:

State Commissioner for Data Protection and Freedom of Information of Baden-Wuerttemberg
(*Landesbeauftragte für Datenschutz und Informationsfreiheit Baden-Württemberg*)

Postal address: Postfach 10 29 32, 70173 Stuttgart | email: poststelle@lfdi.bwl.de

Please note that, in addition, to the data protection supervisory authority responsible for us, further supervisory authorities for data protection may be competent to receive your complaint.