

## HR Privacy Notice for Job Applicants

- for countries outside the European Economic Area, Switzerland and the UK -

deugro-group of companies takes data protection very seriously and we are committed to respecting and protecting your privacy. We have developed this Notice in particular to clearly inform you about how we collect, use, disclose and otherwise process personal data in the context of a job application process, in compliance with applicable data protection laws or as we require in the course of fulfilling our professional responsibilities and operating our business as well as about your rights.

The deugro-group entity which offers the vacancy you are applying for or to which you apply for a position proactively, solely or jointly with DEHOCO (Deutschland) GmbH, part of deugro group (hereinafter referred to as "the Company" or "we" or "us"), is the controller of your personal data. For a list of the relevant deugro-group entities with their contact details, as well as for questions about this Notice, the processing of your personal data in general and to exercise your rights towards us please contact [dpo@deugro-group.com](mailto:dpo@deugro-group.com).

If you notice any changes or inaccuracies in your personal information, you should inform us of such changes so that your personal information may be updated or corrected.

Any job application or the granting of an interview will not create an employment relationship or other agreement between the Company or any entity part of deugro-group and yourself. The submission of your CV/resume and application does not obligate the Company or any other deugro-group entity in any way to consider your application, grant you an interview or make an offer of employment. If you are offered employment by the Company or other entity part of deugro-group as a result of an application, this offer of employment will be conditional on your executing written terms and conditions of employment and complying with any other reasonable requests of the Company or of the hiring deugro-group entity.

## Types of Personal Information Collected

We may collect personal data relating to you when you submit your CV/resume, cover letter, references, and all application related documents, or when you apply for a job through an online registration form or job search website, or when your personal data is submitted to us through third parties, such as recruiters or referees. The personal data we collect and use about you includes the following types of data:

- Personal details (such as name, title, date of birth, address, email address, phone number, nationality, gender, work permit),
- Education and training details (such as educational/academic history, certifications and qualifications);
- Employment history (including CV and contact details of persons who may recommend you - referees),
- Performance evaluation reports, results of performance evaluation interviews, performance evaluation audits, information on activities and training on career development, driver's license, membership in associations, foundations,
- Where applicable, health-related data (medical examinations and/or testing) providing aptitude for the job, and
- Any other information you provide to us on a voluntary basis (e.g. a photo, family, lifestyle or personal circumstances – e.g., marital status).

The Company may request and process data from your criminal record only under special legal conditions, if the processing is required or permitted by the applicable law.

## Purpose and Legal Basis for the Processing of Personal Data

The personal data that we process relating to you will be used by the Company for the purpose of:

- entering into an employment contract with you if your application is successful, including for purposes of personnel administration and to take steps which are necessary before the Company or other deugro-group hiring entity can enter into an employment contract with you, including carrying out appropriate background and security checks;
- Company's legitimate interests in connection with the administration, evaluating and management of your application, including to determine your suitability for the role you have applied for and to keep you informed of your progress; and
- Meeting Company's legal obligations, such as processing information about your nationality or visa status to comply with immigration and employment laws.
- Internship and internship related projects and implementation

If you oppose the collection and use of some personal data processed in order to meet Company's legal obligations or to enter into the employment contract, we may not be able to process your job application.

If you provide us with personal data of third parties (such as information relating to your referees), please ensure that you notify the relevant third party before sharing their personal data with us by showing them this Privacy Notice, explaining that their personal data will be processed in accordance with this Privacy Notice and, where applicable, obtaining their consent.

## Background Checks

Subject to applicable law, any offer of employment may be conditional upon successful completion of any background checks such as reference checks or in exceptional cases – criminal checks. The background checks may involve the collection of additional information about you from educational institutions, government agencies, previous employers, information in the public domain and law enforcement agencies at the international, national or local level so far as is permitted by applicable law.

If you accept an offer of employment, or if you are employed before the background checks are completed, and the results of your background checks are unsatisfactory to the Company, your employment may be terminated, or if you have not commenced employment, any employment offer may be rescinded or any employment contract entered into may be terminated immediately.

## Sharing of Personal Data

For the purposes set out above, we may share your personal information with other parties. The recipients of your personal data may include:

- Referees

In the context (and for the purposes) of your job application process with us, the Company will contact any persons you have indicated as referees (persons that may recommend you for the job you have applied for) and discuss

your previous experience and performance. This may involve the transfer of some of your personal data to these individuals.

- **Other entities part of deugro-group**

The Company may transfer your personal data to other departments and affiliated companies part of deugro-group, who may use your personal data in accordance with this Privacy Notice. In particular, if you are applying for positions in one of our entities located in a specific country, your personal data will be shared with the management of that local entity, who will make the final hiring decision.

### Service providers

The Company may share your personal data with companies that provide services to us in connection with the application process, such as IT providers for system development and technical support. The service providers are required to keep your personal information confidential and are not allowed to use the personal data for any other purpose than to carry out the services they are performing to us.

### Business partners

We may share your personal information with our business partners if it is necessary for the job application process, such as recruitment consultants and agencies, online recruitment tool providers, and companies hired to conduct background checks on our behalf – if applicable.

### Third parties, where required by law

We may disclose your personal information to third parties if it is necessary to comply with a legal obligation or the decision of a judicial authority, public agency or government body, or if the disclosure is necessary for national security, law enforcement or other matters of significant public interest.

### Third parties in connection with a business sale

If we make a sale or transfer of assets, or are otherwise involved in a merger or transfer of business or assets, we may transfer your personal information to one or more third parties as part of that transaction.

### Other third parties with your consent

We may also share your personal information with other third parties when you consent to such sharing.

## International Transfers of Personal Data

The recipients of your personal data may be located in countries outside of your country of residence, where the laws may provide a different level of data protection than the laws. In particular, we may transfer your personal data to DEHOCO (Deutschland) GmbH based in Germany. The Company and deugro-group is committed to protecting your personal data that may be transferred across borders, consistent with relevant data protection laws.

Before transferring your personal data outside the country in which you reside, we will adopt safeguards to ensure that the recipient entities provide an adequate level of data protection that is at least comparable to the protection set out under applicable data protection law of the country you reside in, by execution of appropriate data transfer agreements or confirming there are in place adequate security measures and other controls.

## Data Retention

Your personal data will be retained only for so long as reasonably necessary for the purposes set out in this notice and as long as required by applicable law. In case your application is rejected, your personal data may be retained for maximum six (6) months after the completion of the application process, to be used for future employment opportunities, subject to applicable laws on retention of personal data. If you do not want us to store your personal data in our talent database, please let us know in your application or contact us using the form provided in the "[How to contact us](#)" section.

The information obtained in the context of background checks will be retained only for as long as reasonably necessary for the purposes set out above, in accordance with applicable law.

If your application is successful and you are offered an employment with the Company or other deugro-group entity, your personal data will be transferred to an employee personnel file and will be processed and retained in accordance with applicable law and the applicable employee privacy notice, a copy of which will be provided to you.

## Your Rights

Subject to the conditions and limitations set out in applicable law, you are entitled to request access to, rectification or erasure of your personal data or restriction of the processing or to object to the processing of your personal data by us. You may also request data portability and challenge certain automated decisions we make about you where those decisions have legal or other similarly significant consequences. We don't typically carry out automated decision-making but, if we do, we will make it clear where such decisions are being made.

Requests should be submitted via the form in the "[How to contact us](#)" section below.

You also have a right to lodge a complaint with the supervisory authority for data protection in your country of residence or in which the company processing your data is based. Supervisory authorities are independent public authorities that monitor the application of data protection law through investigative and corrective powers. They advise on data protection issues and deal with complaints about violations of applicable data protection law.

## How to contact us

If you have any questions about how we use your personal data or about this Privacy Notice in general, please contact us using this [form](#).

## Changes to this Privacy Notice

We may change and update this Privacy Notice from time to time. Any changes to our Privacy Notice will be posted on [www.deugro.com](http://www.deugro.com).

This Privacy Notice was last updated on September 19, 2024.