

## **Privacy Policy for Applicants per Article 13 DSGVO**

We from AP&S International GmbH are delighted that you would like to submit an application to us. With the information below, we are providing you with an overview of the processing of your personal data in the application procedure and provide further information relevant to this topic.

### **1. Who is responsible for the processing of your personal data?**

Responsible for the processing of your personal data within the application procedure at AP&S is:

AP&S International GmbH  
Obere Wiesen 9  
78166 Donaueschingen  
Telefon: 0771 8983 0  
E-Mail: [datenschutz@ap-s.de](mailto:datenschutz@ap-s.de)

*Hereinafter referred to as AP&S, the company or we.*

For questions regarding data protection at AP&S you can contact our HR department at [personal@ap-s.de](mailto:personal@ap-s.de) or our data protection officer as follows:

Wolfgang Homann  
c/o bbcom secure Deutschland gmbh  
Reichenaustraße 11  
78467 Konstanz  
E-Mail: [datenschutz@ap-s.de](mailto:datenschutz@ap-s.de)

Our data protection officer in Singapore can be contacted via mail or email as follows:

Sebastian Blasius  
Luther LLP  
4 Battery Road  
Bank of China Building, #25-01  
Singapur 049908  
Email: [sebastian.blasius@luther-lawfirm.com](mailto:sebastian.blasius@luther-lawfirm.com)  
Tel.: +65 6408 8000

### **2. What personal data do we process?**

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

- Your contact details, such as your name, address, telephone number and email address;
- Your application documents, such as CV, cover letter, work experience and previous employment
- Information about your professional experience and skills, such as language skills, performance assessments, educational credentials and credentials
- Your photo, if you have voluntarily added it to the application
- Our notes from interviews with you and possibly video interviews
- Your desired salary, the type of job you are interested in and the entrance date
- In exceptional cases, your identity documents
- Driving license data, if this is necessary for the job performance

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

Your personal data will usually be gathered directly from you in the context of the employment process, in particular from your application documents and the job interview, as well as by way of the staff questionnaire. Furthermore we may also receive the above data from other sources.

This includes, for example, employment agencies, the references you may provide us with, websites and other publicly available information on the Internet. This includes, for example, data which you have obviously made public yourself within the framework of an online profile and which 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 portals. When collecting data from other sources, we of course always observe all legal regulations.

If you apply via our online portal or our job offers on our website, we may collect access information, such as the IP address of your access device. Further information about it can be found in our privacy policy on our website. Participation in online application procedures is voluntary. If you do not participate, you will not incur any disadvantages in the application process.

We seek applicants regardless of race, ethnic origin, gender, religion or belief, disability, age or sexual identity. We do not require any information from you that cannot be used in accordance with the German Equal Treatment Act or any other national or international Equal Treatment Act. Please do not pass on any confidential internals or even trade secrets of your former or current employer.

If you are not yet of legal age 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.

Basically, the provision of your personal data as a part of the application process is voluntary. However, the provision of personal data is required for the processing of your application or a contract for employment with us. This means that unless you provide us with personal data when applying, we cannot enter into any employment relationship with you.

### **3. On which legal basis do we process your data?**

The legal basis for the processing of your personal data in the application process is primarily § 26 BDSG-neu. When collecting data about you from other sources, if applicable, 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 yourself available to the public within the meaning of Article 9 paragraph 2 letter e DSGVO.

Furthermore, we may process personal data about you, as far as this is required to defend against asserted legal claims from the application process against us. The legal basis is Article 6 paragraph 1 letter b and f. The legitimate interest here is, for example, a burden of proof on our part in a procedure under the General Equal Treatment Act (AGG).

If you have received a confirmation for a job as part of the application process, the data from the applicant data system will be transferred to our personnel information system. In this case, in accordance with § 26 (1) BDSG-neu, we may further process the personal data, we have already received from you for employment purposes.

If you cannot be offered a vacancy that is currently vacant and if, on the basis of your profile, we are of the

opinion that your application could be of interest for future job advertisements, we may ask you whether we may store your application data in our applicant management system for a further twelve months. This will only be done, if you agree on the legal basis of your explicit consent in accordance Art. 6.(1) letter. a DSGVO. In this case, your data will be automatically deleted after 12 months from your consent.

#### **4. For what purpose do we process your data?**

The data provided by you will be processed for the processing and examination of your application and, if an employment relationship is established, also for the execution of the employment relationship. We collect and process your personal data in order to offer advertised positions and to be able to carry out the selection process. Processing for another purpose does not take place.

#### **5. Who receives your application data?**

Your application data will be stored and processed by the persons entrusted with the application process. The storage of the data is designed so that only a narrow circle of authorized persons is authorized to access and any other access or other notice of the data according to the prior art is excluded. Your data is usually processed in Germany.

Your application data will be processed within the HR department as well as in the relevant department for your application. Access to your personal data is always limited to the group of people who need the information to perform their duties.

If necessary, data processing companies that provide personnel services for us may also receive personal data insofar as this is necessary for processing purposes. The processing then takes place according to our instructions (order data processor). The data processing companies are contractually obliged to implement appropriate technical and organizational measures in order to protect their personal data and to process it only as contractually stipulated by us.

Personal information will also be disclosed to government agencies and / or law enforcement agencies if required for the above purposes, if required by law, or if required to protect our legitimate interests in accordance with applicable laws.

#### **6. How long will the data be stored?**

Data from applicants will be deleted after 6 months after the end of the selection procedure.

In the case that you have agreed to further storage of your personal data, we will keep your data in our applicant management system. There, the data will be deleted after 12 months.

If you have applied in paper form and have received a cancellation within the framework of the application process, your application documents will be destroyed according to the deadlines above in accordance with data protection.

#### **7. What rights do I have in regard to my personal information?**

You can request information about the data stored about you at the addresses listed under point 1. In addition, under certain circumstances, you may request the correction or deletion of your data. You may also be entitled to restrict the processing of your data and have the right to disclose the data you provide in a structured, common and machine-readable format.

#### **Right of objection**

If we process your data in order to safeguard legitimate interests, you can object to this processing for reasons that arise from your particular situation. We will then no longer process your personal

information unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is intended to assert, exercise or defend legal claims.

If we have asked for your consent, you can 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 has no influence on an already completed processing.

You have the option to contact our data protection officer or a data protection supervisory authority with a complaint.