

Privacy notice - Job applicants

In our privacy notice below, you can find information about how we collect, process and use the data which you provide us when you apply for a job within Plugsurfing. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

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The data controller

For the purpose of the EU General Data Protection Regulation 2016 (GDPR), the data controller is Plugsurfing GmbH.

How does Plugsurfing process your personal data?

We need to treat your personal data for many different purposes and in several ways. Common for all our personal data processing is that it is carried out with appropriate safeguards taken into account and in accordance with the fundamental principles in data protection legislation.

In this information, we have compiled the different data types, purposes and legal bases on which we rely for our data processing. In case of significant changes, we will inform you appropriately, see below at the end of the information text.

What kind of data does Plugsurfing collect?

Plugsurfing collects and processes personal data in various categories, including :

- **Contact data** - such as your address, phone number;
- **HR data** - such as job applicant evaluation data, CV, job applicant background clearance;
- **Identifying data** - such as name, national ID/social security number;
- **Medical and health data** - such as health checks and health data;
- **Behavioral data** - such as log in details

Plugsurfing collects data that is necessary for the relationship you have with us and the purposes for which the data are used. All our data processing of personal data has legal basis.

What sources are the personal data obtained from?

The personal data which we process about you comes from different sources:

- We receive information from yourself, when you apply for a job, or when you send in your personal data to us.
- We receive information, as part of our relationship with you as a job applicant, such as background clearance or behavioral information.
- Based on your consent, we may collect information from third parties, such as national security authorities, health service.

What are the purposes for processing personal data?

We process personal data only for predefined purposes. The purposes for which we process personal data are:

- **Employee recruitment**
To be able to manage a professional recruitment process with our job applicants, we need your personal data. We review the personal data which you share with us, such as CV and references; and we assess and select applicants in the process. Furthermore, we might collect background clearance and references. From the recruitment until the termination of the employment, the records are stored in our HR protected systems and network drives, with restricted access only for authorized personnel.
- **Management of employee information**
We need a contract with all our employees to fulfil our contractual obligations. Therefore, we

collect personal data to create and manage contracts with our job applicants. We also manage our employee information as part of our employer role.

On what legal basis do we process your personal data?

We rely on several legal bases when processing your personal information:

- Your specific and freely given consent. If we rely on your consent as the legal basis for processing your data, you may withdraw your consent at any time,
- The processing is necessary to fulfill an agreement between us and you or necessary to conclude such an agreement,
- The processing is necessary to fulfill a legal obligation that is owed to us (for example, we are required by law to store certain data for a certain period of time) and / or to determine, enforce or defend Plugsurfing against legal claims or claims,
- The processing is necessary for purposes pertaining to the legitimate interests of our or third parties, which consider the registrant's interests and fundamental rights and freedoms (ie, balance of interests). Our legitimate interest in such treatments is employee recruitment, e.g. planning, interviewing.

How does Plugsurfing use your personal data in automated decision-making?

We do not make decisions about you through automated decision making in recruitment.

How long do we store the personal data?

Plugsurfing seeks to limit the period for which the personal data are stored to a minimum. Thus, Plugsurfing processes your personal data only to the extent and as long as is necessary to meet the purposes of the data processing.

The specific retention periods may be different depending on the categories of data. Plugsurfing sets out and regularly re-evaluates data type specific retention periods for the personal data it holds. Once personal data is no longer necessary, Plugsurfing will delete it or anonymise it as soon as possible.

Who processes your personal data?

Principally, we do not sell, trade or license any personal data to third parties. Personal data may be disclosed to our authorized employees or affiliates to the extent necessary for the purpose of processing. The data will never be available to all employees but to a limited number of authorized persons.

In addition, personal data may be disclosed to authorities when we are required to do so by law, based on demands made by competent authorities in accordance with existing privacy laws.

Does Plugsurfing transfer personal data to third countries?

Principally, Plugsurfing does not transfer personal data outside the European Union or the European Economic Area (EEA). However, if personal data is transferred outside the EU or the EEA, Plugsurfing uses appropriate safeguards in accordance with existing privacy legislation, such as the standard contractual clauses provided by the European Commission.

How does Plugsurfing protect the personal data?

Plugsurfing fulfils the necessary technical and organizational measures, which ensure and demonstrate that privacy laws are being followed in the processing of personal data.

These measures include the monitoring of access rights so that only the authorized persons have access to the personal data, using firewalls, pseudonymisation of data, detailed instructions and training for personnel on protection of personal data and careful consideration when selecting our service providers that are involved in the processing of personal data on our behalf.

How do we handle personal data from IP addresses, cookies and similar technologies?

When you use our services or visit our websites, Plugsurfing can collect data about your devices through cookies and other tracking techniques.

Cookies are a small text file that we use to identify and count the browsers and devices that visit our websites. This information may then be used by us or third parties for marketing purposes.

What are your rights when it comes to your personal data?

You have as registered a number of rights by law:

- **Right of access** - You have the right to access your personal data, which means that you have the right to confirm whether your personal data are processed and, if so, also receive a copy of the personal data that is processed by Plugsurfing (so-called registry extracts) and further information about the processing carried out by Plugsurfing.
- **Data Portability Right** - You are entitled to data transfer, which means that you may, under certain circumstances, have the right to have the personal data transmitted to another controller.
- **Right to rectification**- You are entitled to have incorrect information about you corrected or supplemented.
- **Right to erasure** - You have the right to have your data erased, if
 - the data are no longer necessary for the purposes for which they are processed;
 - you revoke your consent for some treatment and thereafter there is no legal basis for Plugsurfing to process the data,
 - your data has been processed illegally, or
 - the processing of your data is not necessary to comply with applicable legal requirements in order to determine, enforce or defend legal claims and / or for archival, research or statistical purposes.
- **Right to revoke consent** - If you have given special consent to certain treatment, you are always entitled to withdraw your consent.
- **Right to object to processing of personal data** – When processing is carried out on the basis of the legitimate interests pursued by Plugsurfing or by a third party, you have the right to object at any time to processing of personal data concerning you. Unless Plugsurfing can demonstrate compelling legitimate grounds for the processing, Plugsurfing shall no longer process the personal data.

- **Right to object to direct marketing** - You are entitled to object to the processing of personal data pertaining to you for direct marketing at any time. Then we will no longer process personal data for such purposes.
- **Right to restriction** - You are entitled to limit your data during the time we investigate and check your request.
- **Right not to be subject to automated decision** - If we have made a decision about you based entirely on an automated process and the decision has legal consequences or otherwise significantly affects you, you may request that the decision be reviewed by us through renewed and individual assessment. This applies if we cannot prove that an automated decision is necessary to conclude or implement an agreement between you and us.
- **Right to complain to the supervisory authority** - You are entitled to complain to the Data Inspection Authority or other competent regulatory authority if you believe that we treat your personal data in violation of applicable data protection legislation.

Changes to our privacy notice

Plugsurfing reserves the right to amend this Privacy Notice. Possible amendments to the Privacy Notice will be notified about on our website.

Amendments may be necessary due to the development of our services or, for example, changes in the relevant laws.

Contact

Questions and comments regarding this privacy notice are welcomed and should be addressed lisa.jacob@plugsurfing.com or in writing to the address below.

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