

## Privacy Notice for Applicants

### 1 General information

We are pleased that you are interested in us and are applying or have applied for a position with one of the brands listed below that belong to the Erwin Hymer Group SE. Below we would like to provide you with information on the processing of your personal data in connection with your application.

#### 1.1 Controller (responsible entity)

Etrusco GmbH Ölmühlestraße 6 88299 Leutkirch Telefon: +49 7561 9097 -450 E-Mail: info@etrusco.com	Sunlight GmbH Ölmühlestraße 6 88299 Leutkirch Telefon: +49 7561 9097-300 E-Mail: info@sunlight.com	Carado GmbH Ölmühlestraße 6 88299 Leutkirch Telefon: +49 7561 9097-300 E-Mail: info@carado.com
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#### 1.2 Data Protection Officer

We have appointed a data protection officer in our company. You can reach them using the following contact details:

DDSK GmbH  
Stefan Fischerkeller  
Dr.-Klein-Str. 29  
88069 Tett nang, Germany  
Email: anfragen@ddsk.de

## 2 Scope of processing

### 2.1 Sources and categories of data

We process the data that you have sent us in connection with your application in order to assess your suitability for the position (or, if applicable, other open positions in our companies) and to carry out the application process. In addition, we process personal data that you have published on the internet and that we are permitted to process within the scope of data protection laws. This includes, for example, your CV, career history, etc.

### 2.2 Purposes and legal bases for processing

We process your personal data in compliance with the provisions of the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG-new), and other applicable laws.

The primary legal basis for processing your personal data in this application procedure is Article 6(1)(b) GDPR in conjunction with Section 26 BDSG-new. Under these provisions, processing is permitted if it is necessary in connection with the decision on the establishment of an employment relationship. This also includes the processing of communication data (user details, content data, connection data and comparable data) within the scope of conducting the application process through the use of internet-based communication tools.

If, after completion of the application process, data may be required for the assertion of legal claims, processing may take place on the basis of Article 6 GDPR, in particular to safeguard legitimate interests pursuant to Article 6(1)(f) GDPR. Our interest then lies in the assertion or defense of claims. We may process your personal communication data (user details, content data, connection data and comparable data) within the scope of the application process, in particular for the digital conduct of job interviews, where contract initiation is carried out using internet-based communication tools, in order to simplify the organisational flow of the application process and to adapt it to the respective current needs of applicants and employers.

Furthermore, your voluntary consent pursuant to Article 6(1)(a) GDPR may constitute the legal basis for data processing (e.g., inclusion in the applicant pool,

newsletter for new job offers). Consent may be withdrawn at any time with effect for the future.

If we process your personal data for a purpose not listed above, we will inform you in advance.

## 2.3 Consequences of not providing data

As part of your application, you must provide the personal data that is necessary for establishing the employment relationship that we are legally obliged to collect.

## 2.4 Automated individual decision-making

We do not use solely automated decision-making procedures within the meaning of Article 22 GDPR. Should we use such a procedure in individual cases in the future, we will inform you separately, provided this is required by law.

## 3 Recipients of the data

### 3.1 Within the EU

Within our company, only those persons and departments (e.g., the relevant department, management, HR department) receive your personal data that require it for the application process.

Your applicant data is reviewed by the HR department after receipt of your application. Suitable applications are then forwarded internally to the department managers responsible for the respective open position.

The further process is then coordinated. In principle, only those persons in the company have access to your data who require it for the proper conduct of our application procedure.

## 3.2 Overview of recipients

The following recipients receive your data within the scope of the data processing described here:

**Recipient:** Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA

**Third-country transfer:** There is no adequacy decision for the transfer. The transfer is based on Article 46 GDPR. The services used are provided by Microsoft, a US provider. Personal data is therefore also processed in a third country. We have concluded a data processing agreement with the service provider that meets the requirements of Article 28 GDPR. Data will only be transferred to a third country once the special requirements of Articles 44 et seq. GDPR have been met. The present transfer of data to the USA is based on the Standard Contractual Clauses and the amended contractual terms following the Schrems II ruling. Specifically, Microsoft has included the following provisions in the new contractual clauses:

- the right to compensation for the data subject whose data has been unlawfully processed and who has suffered material or non-material damage as a result;
- informing the data subject if Microsoft is legally obliged by a government order to disclose data to US security authorities;
- Microsoft's obligation to pursue legal remedies and appeal to US courts in order to challenge the authority's order to disclose the data.

## 4 Retention periods

Data of applicants will be deleted after 6 months in the event of a rejection.

If you have consented to further storage of your personal data for additional job postings or for a period extending beyond the current application procedure, we will transfer your data to our applicant pool. There, the data will be deleted after two years.

If you receive an offer for a position as part of the application procedure, the data will be transferred from the applicant data system to our HR information system.

## 5 Your rights as a “data subject”

Under certain conditions, you may assert your data protection rights against us. Wherever possible, your requests to exercise your rights should be addressed in writing or by email to the address given above or directly in writing or by email to our data protection officer.

- You have the right to obtain information from us about the data stored about you in accordance with Article 15 GDPR (possibly subject to restrictions under Section 34 BDSG-new).
- Upon your request, we will correct the data stored about you pursuant to Article 16 GDPR if it is inaccurate or incorrect.
- If you wish, we will delete your data in accordance with the principles of Article 17 GDPR, unless other legal provisions (e.g., statutory retention obligations or restrictions under Section 35 BDSG-new) or an overriding interest on our part (e.g., to defend our rights and claims) prevent this.
- Subject to the requirements of Article 18 GDPR, you may request that we restrict the processing of your data.
- If your personal data is processed on the basis of legitimate interests pursuant to Article 6(1)(f) GDPR, or if it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, you have the right to object to the processing of your personal data pursuant to Article 21 GDPR, insofar as there are grounds for doing so arising from your particular situation or if the objection is directed against direct marketing. In the latter case, you have a general right to object, which we will implement without requiring reasons relating to your particular situation.
- You also have the right to receive your data in a structured, commonly used and machine-readable format under the conditions of Article 20 GDPR or to have it transmitted to a third party.
- In addition, you have the right to withdraw any consent you have given for the processing of personal data at any time with effect for the future.
- You also have the right to lodge a complaint with a data protection supervisory authority (Article 77 GDPR). However, we recommend that you first always address a complaint to our data protection officer.

You can contact the supervisory authority responsible for us at:

The State Commissioner for Data Protection and Freedom of Information Baden-Württemberg

# CORIGON

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