

Graebel Companies Inc. Job Applicant Privacy Notice

As part of any recruitment process, Graebel Companies Inc., and all of its subsidiaries which includes; Graebel UK Centre Limited, Graebel Global Client Services Limited, Graebel EMEA Center s.r.o., ("Graebel") –a "data controller" under data protection legislation) collects and processes personal data relating to job applicants ("you"). The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information do we collect?

Graebel collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the EU and UK (including a copy of your passport).

Graebel may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may need to collect sensitive data relating to you (such as medical or health record or condition, etc.) The purpose for collecting and processing of such data is to ensure that we fully comply with our regulatory, legal and contractual obligations.

We may also collect personal data about you from third parties, such as references supplied by former employers and recruitment agencies if they are submitting an application on your behalf. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email). These systems are located both within the EEA and outside of the EEA. Please refer to both our Privacy Notice at <https://www.graebel.com/privacy-policy/> and Employee Privacy Notice policy for further details on data shared outside of the EEA.

Why does Graebel process personal data?

Graebel needs to use the information listed above in order to make decisions about your recruitment, to comply with its legal obligations (for example checking a successful applicant's eligibility to work in the EU and UK before employment starts), to determine the terms on which you work for Graebel, and then once employed, for a number of different reasons

relating to performing the Company's contract with you and complying with its legal obligations etc. Please see Graebel's Employee Privacy Notice for more information <https://www.graebel.com/privacy-policy/>.

Graebel has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Graebel may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics for the purposes of equal opportunities monitoring. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, Graebel may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

If your application is successful, and you become employed/appointed to Graebel, then please refer to Graebel's Employee Privacy Notice for further information about data processing/use during employment.

Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you and employment background check providers to obtain necessary pre-employment screening

All our third-party service providers (including recruitment agencies and background check agencies), are required to take appropriate security measures to protect your personal information in line with our policies. Where we are providing your data to a background check agency for example, we will only permit them to process your personal data for specified purposes and in accordance with our instructions.

How does Graebel protect data?

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For how long does Graebel keep data?

If your application for employment is unsuccessful, and if you agree to allow us to keep your personal data on file, we will hold your data on file for 6 (six) months from when the job you applied for is filled for consideration for future employment opportunities. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronically) and retained during your employment. The periods for which your data will be held will be provided to you in Graebel's Employee Privacy Notice.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where Graebel is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please Graebel's Chief Security and Privacy Officer at privacy@graebel.com.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Graebel during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

Automated Decision Making

Recruitment processes are not based solely on automated decision making.