

Data protection information from Greiner - Application process and recruiting portal

The protection and security of your personal data are important to us. This information sheet provides you with an overview of why we collect your data as part of an application process and how it is processed. The data you provide will be used by Greiner exclusively for the purposes stated here. Greiner undertakes to comply with the data protection laws applicable in the countries in which Greiner does business and applies generally recognized technical security standards to protect all data used in the applicant database and thus ensure the best possible protection against misuse, data loss or falsification. In addition, only certain Greiner employees (limited to those persons involved in the respective application process) are granted access to the personal data in order to ensure that the confidentiality of the data is maintained.

Please note that Greiner consists of the Greiner AG, Greiner Bio-One, Greiner Packaging and NEVEON divisions and thus of a group of companies.

1. Who is responsible for data processing and who can I contact?

All Greiner companies are jointly responsible for **the operation of the Greiner Recruiting Portal** and the **global applicant database** and use it together.

Inclusion in the applicant database takes place by creating a applicant profile . If applications are submitted by other means, e.g. by post or email, the Greiner company issuing the job advertisement will create an applicant profile for the applicant. The applicant receives the access data by email, can edit the applicant profile, select from the usage preferences and finalize it.

You can find an overview of the Greiner companies [here](#)

The Greiner company that advertised the position is responsible for data processing in the course of a **specific selection and application process**.

If you submit an **unsolicited** application, the Greiner company that has advertised the relevant position for unsolicited applications is responsible for data processing.

In the Greiner Recruiting Portal, you have the option of setting up job alerts based on your preferences; you will be notified of relevant vacancies by e-mail. All Greiner companies are jointly responsible for data processing in the course of this **job notification**. You can adapt and deactivate the job notification option in your profile at any time.

The Greiner Training Center of Greiner AG is responsible for providing general information about **apprenticeships** at Greiner in the context of consultations, as well as if you have registered for a taster day or a similar event via the Greiner Training Center career portal.

The Greiner company shall remain responsible even if it commissions others (third parties) to perform certain tasks (see point 3).

Regardless of whether your concern relates to the processing of your data in the context of a specific selection or application process, your applicant profile or another of the above-mentioned scenarios, you can contact us at any time at one of the e-mail addresses provided.

- Greiner Bio-One: recruiting.dataprotection@gbo.com
- Greiner Packaging: recruiting.dataprotection@greiner-gpi.com
- NEVEON: recruiting.dataprotection@neveon.com
- Greiner AG: recruiting.dataprotection@greiner.com

If you send us your personal data by e-mail or post, we ensure secure handling and processing as follows:

- ✓ **Receipt:** Upon receipt of your application, your personal data will be securely uploaded to our SuccessFactors applicant management system.
- ✓ **Consent request:** You will receive an e-mail from us asking you to reset your password and to check and accept our terms of use.

Data retention:

If you do not accept the terms of use, your profile and your personal data will be deleted. If you agree to the terms of use, your profile and personal data will be stored indefinitely until you withdraw your consent. If you are inactive, your profile and personal data will be deleted within 3 years of your last login. Your data will be stored as part of the entire application process for as long as we or legal claims can be asserted or made against us (within the applicable statutory limitation periods) or statutory retention periods must be observed.

2. Processing frame

2.1 What is the source of the data and which data categories are processed?

We process personal data that we have received from you as part of the application process.

Personal data includes your identity data (name, date of birth, nationality, etc.), private contact details and all application documents. In addition, we also store your personal data for processing results that we generate ourselves.

In the context of job notifications, we only process data that originates from you.

2.2 Data from external sources

We process personal data that we have legitimately received from third parties who are authorized to transfer data to us (e.g. personnel consultants or personnel service providers) and, in exceptional cases, from publicly accessible sources (e.g. telephone directory, media) as part of the application process.

2.3 For what purposes will my data be processed?

2.3.1 Processing for the fulfillment of contractual obligations arising from the GREINER RECRUITING PORTAL - TERMS OF USE concluded with us and for the implementation of pre-contractual measures with regard to a future employment contract :

- Job notifications
- Membership in our (global) talent network by creating a applicant profile (even without a specific job application)
- Unsolicited application process
- Job application process
- Apprenticeship application process
- Career orientation process - taster place
- Making contact via social media (social media recruiting)

From the start of the application and selection process, i.e. until the conclusion of an employment relationship, we process your information and also the correspondence in connection with your application and the selection process for the implementation of pre-contractual measures.

2.3.2 Processing based on your (explicit) consent

If you have given us separate consent as part of the processes mentioned at 2.3.1 by selecting the special option "Own profile visible to: All recruiters at Greiner worldwide" in the selection mask of the applicant profile, the data of your applicant profile will be visible to all recruiters of the entire Greiner Group worldwide and across countries for the purpose of future recruitment. In addition, by agreeing to our terms of use, you give us your consent to process the data of your applicant profile for a maximum period of three (3) years after the last update of the applicant profile for the purpose of future recruitment.

Country-specific deviations: For applications in the Netherlands and Portugal, we will keep your personal data on file for a period of one (1) year based on your consent.

In the context of consultations regarding apprenticeships at Greiner, you have given your consent for your data to be processed for a period of 1 year for the transmission of information in connection with apprenticeships at Greiner or job offers.

In the course of an application for an apprenticeship or a taster position, you also give your consent for your documents to be processed by all Greiner companies wishing to fill apprenticeship positions. If you have not yet reached the age of sixteen, you also confirm that your legal guardians (usually your parents) also give their consent.

You have the right to withdraw your consent at any time (via e-mail or directly in your applicant profile) without affecting the lawfulness of processing based on consent before its withdrawal (see point 4).

2.3.3 Processing based on our legitimate interests or those of third parties in the implementation of entrepreneurial freedom

We may consult qualified experts/committees within the Group for a specialist assessment of an application.

For selected positions, we use test systems for aptitude and personnel diagnostics in cooperation with partner companies. For this purpose, we provide our cooperation partners with certain personal information for carrying out the tests and receive the corresponding results.

If we have legitimately received your data from a personnel consultant or personnel service provider, it may be necessary for us to transmit information about the staffing status and data from the employment contract to the personnel consultant or personnel service provider in order to fulfill our contract with them.

If you do not want this for reasons worthy of consideration, you can object to the processing (point 1).

2.3.4 Processing in the event of (labor law) disputes

If a legal dispute arises in the course of the application or recruitment process, the data required for the appropriate legal action will be transmitted to legal representatives and courts.

2.4 Is the provision of data required by law or contract or necessary for the conclusion of a contract?

The provision of data is neither legally nor contractually required. Without the provision of certain personal data, we cannot/could not carry out the application process or conclude a contract with you in the future.

3. Transfer and international reference: Who receives my data? Will data be transferred to a third country or an international organization?

In order to achieve the intended purposes, it may occasionally be necessary for us to transfer and disclose your data to recipients (other group companies worldwide, authorities, public bodies, legal representatives, courts) or to grant cooperation partners access to your data, for example to carry out suitability and personnel diagnostics or data management on our behalf, to use software and IT infrastructure, and for support and maintenance purposes.

The transmission of the relevant data in each individual case takes place on the basis of (pre-)contractual agreements or for the implementation of pre-contractual measures, on the basis of statutory provisions or with your express consent

We only work with cooperation partners who offer sufficient guarantees that your data is also in safe hands with them

Transmission to other Group companies in third countries may take place on the basis of your express consent and depends on whether, when creating your applicant profile, you decide to be visible to all Greiner recruiters worldwide or to limit the visibility of your profile to those persons who are responsible for the specific recruitment process for the position for which you are applying. This also applies to applications by other means, e.g. by post or e-mail, for which Greiner has created an applicant profile for you. However, if you never complete the registration process of your applicant profile with the access data sent by e-mail after selecting your consent preferences, only those persons who manage the specific recruitment process for the position for which you are applying will have access to your data.

Your personal data will be transferred to cooperation partners (processors, recipients) based within the EU and, in rare exceptional cases, will be accessed from the USA (see table).

Partner/recipient	Registered office (country)	Purpose and basis for the transfer to a Third country
Legal representative	Potentially third countries	Pursuit of legal claims
Courts	Potentially third countries	Pursuit of legal claims
Public bodies in connection with the establishment of flexible workplaces and similar programs		Contract fulfillment; Within the EEA area; Adequacy decision by country-specific competent authorities; country-specific standard contractual clauses; contractual clauses
Greiner AG (parent company of the Group) as Service provider of central (IT) services	Austria	Processor Within the EEA area; Adequacy decision by country-specific competent authorities; country-specific standard contractual clauses; contractual clauses
Divisional parent companies as Service provider of central (IT) services	Austria	Processor Within the EEA area; Adequacy decision by country-specific competent authorities; country-specific standard contractual clauses; contractual clauses
Division sister company as Service provider of (IT) services	Austria	Processor Within the EEA area; Adequacy decision by country-specific competent authorities; country-specific standard contractual clauses; contractual clauses
All Greiner	Worldwide	Your consent Alternatively: Within the EEA area, Adequacy decision by the EU Commission or country-specific competent authorities; EU standard contractual clauses or country-specific standard contractual clauses; contractual clauses
HR software service provider	Germany, EU	Processor Within the EEA area

Recruitment agencies, partners		Pre-contractual measure; fulfillment of contract Within the EEA area; Adequacy decision by country-specific competent authorities; country-specific standard contractual clauses; contractual clauses
Service provider for suitability and Personnel diagnostics	EU	Processor Within the area
Service provider for social media recruiting	Germany	Processor Within the EEA area
Provider of applicant surveys		Processor

3.1 How long will my data be stored?

Your data will be stored throughout the entire application process for as long as we or legal claims can be asserted or made against us (within the applicable statutory limitation periods) or statutory retention periods must be observed. Your personal data may also be stored for longer if this is necessary to comply with applicable laws or to defend our legal interests. This also applies to applications by other means, e.g. by post or e-mail, provided that you never complete the registration process of your applicant profile with the access data sent by e-mail according to your consent preferences.

<u>Legal retention period for applicant data</u>		<u>Country/Region</u>
7	Month(s)	Austria (AUT)
5	Year(s)	Belgium (BEL)
6	Month(s)	Bulgaria (BGR)
36	Month(s)	Brazil (BRA)
3	Month(s)	Switzerland (CHE)
6	Month(s)	Czech Republic (CZE)
6	Month(s)	Germany (DEU)
2	Month(s)	Estonia (EST)
24	Month(s)	France (FRA)
6	Month(s)	England (GBR)
36	Month(s)	India (IND)
12	Month(s)	Italy (ITA)
6	Month(s)	Japan (JPN)
1	Month(s)	Netherlands (NLD)
12	Month(s)	Romania (ROU)
12	Month(s)	Serbia (SRB)
24	Month(s)	Sweden (SWE)
24	Month(s)	Turkey (TUR)
12	Month(s)	America (USA)
1	Month(s)	

1	Month(s)	Slovakia
36	Month(s)	Poland
1	Month(s)	Portugal
12	Month(s)	Spain
36	Month(s)	Thailand
12	Month(s)	Mexico
36	Month(s)	China
6	Year(s)	Singapore
18	Month(s)	United Arab Emirates (Dubai)
5	Year(s)	Indonesia

Based on any consent you may have given, we will store your data for **three (3) years** from the last active use of your applicant profile, i.e. your applicant profile will be anonymized in case of inactivity, three years after your last login. Data relating to a specific application will be anonymized three years after the last update (e.g. after rejection).

Country-specific deviations: For applications in the Netherlands and Portugal, we will store your data for one year from the last active use based on your consent, i.e. your applicant profile will be anonymized one (1) year after your last login in case of inactivity. Data relating to a specific application will be anonymized one (1) year after the last update (e.g. after rejection).

We will store your data for an unlimited period of time until you withdraw your consent.

4. Rights of data subjects

4.1 What data protection rights am I entitled to?

You have the right at any time,

- to request information about which of your data is processed by us
- to have your data corrected or deleted, unless our legitimate interests in processing prevail
- restrict the processing of your data
- to object to the data processing
- To assert data portability

4.2 Can I withdraw my consent?

You have the right to withdraw your consent to the use of data at any time (see point 2 - Consent) without affecting the lawfulness of processing based on consent before its withdrawal. If you wish to withdraw your consent to the use of your data, please log in to your applicant profile that you created when you applied.

After registration you can:

- Change/delete your data
- View/delete your data
- Delete your profile

Alternatively, you can contact one of the following e-mail addresses to object to the processing of your personal data:

- Greiner Bio One: recruiting.dataprotection@gbo.com
- Greiner Packaging: recruiting.dataprotection@greiner-gpi.com

- NEVEON: recruiting.dataprotection@neveon.com
- Greiner AG: recruiting.dataprotection@greiner.com

At this point, we would also like to point out that the controller has alternative legal bases for processing, in particular from the start of the formal selection procedure.

4.3 Is there a right of appeal to a supervisory authority?

You have the right to lodge a complaint with the competent supervisory authority at any time.

For EU/EEA citizens: You have the right to lodge a complaint at any time with a data protection supervisory authority within the European Union/EEA, in particular in the member state of your habitual residence, your place of work or with the Austrian data protection authority as the data protection authority responsible for Greiner.

4.4 Is there automated decision-making, including profiling, for recruitment ?¹

No automated decision-making or decision-making based on profiling takes place

4.5 Is data processed for other purposes?

We only process your data for the purposes listed above. If we intend to (further) process your data for other purposes, we will inform you of this separately.

For statistical purposes (e.g. reporting), your data will only be processed anonymously and no conclusions can be drawn about your person.

We hope that this information sheet has provided you with clarity as to how and for what purposes we process your data. If you still have questions about the processing of your data, please get in touch with the contact point in **point 1**.

¹ The definition of "Profiling" can be found in Article 4.4 of the GDPR (<http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679&from=DE>).