# **Data privacy information Greiner - Recruiting Portal**

The protection and security of your personal data are important to us. With this data privacy information, we provide you with an overview of why we record your data as part of an application process and in what form your data is processed. The data you submit will be used by Greiner exclusively for the purposes stated here. Greiner is committed to complying with the data protection laws applicable in the countries in which Greiner does business and applies generally accepted technical security standards in order to protect all data used in the applicant database and thus to ensure the best possible protection against misuse, data loss or falsification. In addition, only certain employees of Greiner (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 divisions Greiner AG, Greiner Bio-One, Greiner Packaging and NEVEON and thus of a group of companies.

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

All Greiner companies are jointly responsible for **operating the Greiner Recruiting Portal** and the **global applicant database** and all Greiner companies use both jointly.

You will be submitted to our applicant database by creating an applicant profile. An overview of the Greiner companies can be found <u>here</u>.

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

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

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

The Greiner Training Center of Greiner AG is responsible for general information about **apprenticeships at Greiner** during counseling sessions, as well as if you have registered for a trial day or a similar event via the career portal of the Greiner Training Center.

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

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 any other of the above-mentioned scenarios, you can contact us at any time at one of the e-mail addresses listed.

- 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



### 2. Processing framework

### 2.1 What is the source of the data and what categories of data 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, birthday, nationality, etc.), private contact data and all application documents. In addition, we also store your personal data on 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 source

We process personal data that we have permissibly received as part of the application process 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).

#### 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 performance of pre-contractual measures regarding a future employment contract:

- Job notifications
- Membership in our (global) talent network by creating an applicant profile (even without a concrete job application)
- Unsolicited application process
- Job application process
- Apprenticeship application process
- Vocational orientation process trial days
- 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 correspondence in connection with your application and the selection process in order to carry out pre-contractual measures.

### 2.3.2 Processing based on your (explicit) consent

Insofar as you provide us with separate consent within the scope of the processes mentioned under 2.3.1 by selecting the special option "Make my profile visible to: Any Recruiter within Greiner worldwide" in the selection screen 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 job placements. In addition, by agreeing to our Terms of Use, you give us permission 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 job placements.

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

During consultations regarding apprenticeship 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 apprenticeship at Greiner or job offers.

When applying for an apprenticeship or for trial days, 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 the parents) also consent.

You have the right to revoke your consent at any time (via e-mail or directly in your applicant profile), without affecting the lawfulness of the processing carried out until the revocation (see point 4).

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

For the specialist assessment of an application, we may consult qualified experts / committees within the Group.

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 to conduct the testing 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 transfer information about the staffing status and data of 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 during the application or staffing process, the data required for appropriate legal prosecution 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 the data is neither legally required nor contractually stipulated. 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 foreign reference: Who receives my data? Is data transferred to a third country or an international organization?

In order to achieve the intended purposes, it may be necessary on a case-by-case basis 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, in order to carry out aptitude 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 data relevant in the respective individual case takes place on the basis of (pre)contractual agreements or for the implementation of pre-contractual measures, on the basis of legal provisions or with your explicit consent.

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

A transfer to other group companies in third countries can take place on the basis of your explicit consent and depends on whether you decide that you want your profile to be visible to all Greiner recruiters worldwide or to limit the visibility of your profile to those persons involved in the specific hiring process of the position for which you are applying, when creating your applicant profile.

A transfer of your personal data takes place to cooperation partners (order processors, recipients) located within the EU, and in rare exceptional cases access from the USA (see table).

Partner/Recipient	Registered office (country)	Purpose and basis for the transfer to a third country
Legal representative	Potential third countries	Pursuit of legal claims
Dishes	Potential 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 of country-specific competent authorities; country-specific enacted standard contract clauses; contract clauses.
Greiner AG (Group parent company) as Service provider of central (IT) services	Austria	Processor Within the EEA area; Adequacy decision of country-specific competent authorities; country-specific enacted standard contract clauses; contract clauses.
Divisional parent companies as Service provider of central (IT) services	Austria	Processor Within the EEA area; Adequacy decision of country-specific competent authorities; country-specific enacted standard contract clauses; contract clauses.
Division sister company as Service provider of (IT) services	Austria	Processor Within the EEA area; Adequacy decision of country-specific competent authorities; country-specific enacted standard contract clauses; contract clauses.
<u>All Greiner companies</u>	worldwide	Your consent; Alternatively: Within the EEA area, Adequacy decision of 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 action; performance of contract Within the EEA area; Adequacy decision of country-specific competent authorities; country-specific enacted standard contract clauses; contract clauses.
Service provider for suitability and Personnel Diagnostics	EU	Processor Within the EEA area
Service provider for social media recruiting	Germany	Processor Within the EEA area
Applicant survey provider		Processor

### 3.1 How long will my data be stored?

Your data will be stored in the context of the entire application process in any case as long as we or against us legal claims are asserted or can be made (within the applicable statutory limitation periods) or statutory retention periods must be complied with. Your personal data may also be stored for longer if this is necessary to comply with applicable laws or to defend our legal interests.

Based on your consent, we store your data calculated from the last active use of your applicant profile for three (3) years, i.e., your applicant profile is 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 of the application (e.g., after rejection).

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

In the context of job notifications, we store your data indefinitely until you revoke it.

# 4. Data subject rights

# 4.1 What data protection rights do I have?

You have the right at any time,

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

# 4.2 Can I revoke my consent?

You have the right to revoke your consent to the use of data at any time (see point 2 - Consent) without affecting the lawfulness of the processing carried out on the basis of the consent until revocation. If you wish to revoke your consent to the use of data, please login to your applicant profile that you created when you applied. After logging in, you can:

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

Alternatively, you can contact us at one of the following email addresses to withdraw your consent 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 inform you that the controller has alternative legal bases for processing, in particular with/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 respective supervisory authority at any time.

The following applies to 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 any automated decision-making including profiling<sup>1</sup> for job placements?

Neither automatic decision-making nor decision-making based on profiling takes place.

### 4.5 Is data further processed for other purposes?

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

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

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

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