

## **Data privacy notice for the applicant management process at Bosch Group**

### **We want you on our team.**

In this privacy notice, we inform you how your personal data is processed in the applicant management process at Bosch Group. Additionally we inform you about your rights under applicable data privacy laws. Personal data is all data that refers to an identified or identifiable natural person, such as date of birth, address or invoice data, and data that is specific to their identity.

The personal data you have entered in our applicant management system will be processed by the relevant legal entities of the Bosch Group for the purpose of processing your application and with the objective of filling vacant positions in one of the companies at Bosch Group.

At Bosch Group, the process of filling vacancies involves several members of our HR departments, together with the respective managers and if required also the members of the respective department responsible for the recruitment process. As these people may belong to different companies of Bosch Group, your data may be exchanged within the Bosch Group all over the world.

### **Bosch respects your privacy**

Protecting your personal data and ensuring the security of all our business data are important concerns for us. We always consider these concerns in our business processes. The personal data collected when you apply online is treated confidentially and strictly in accordance with the statutory provisions.

Data privacy and information security are an integral part of our corporate policy.

### **Contact details of the data controller and the data privacy officer**

The Bosch Group legal entity to which you submit your application is responsible for processing your data. The contact details of the Bosch Group in Georgia:

Robert Bosch LTD, 61 Davit Aghmashenebeli Avenue, 0102, Tbilisi, Georgia

Below are the contact details of our Data Privacy Officer, Makarov Sergej,

(Regional Data Security Officer):

Mr.  
Makarov Sergej  
Regional Data Security Officer  
Information Security and Data Privacy Department, OOO Robert Bosch (C/DSO-RU)  
OOO Robert Bosch  
24 Vashutinskoe shosse  
141400 Khimki  
Russian Federation  
or

Mail to: [RBRU.DSO.Privacy @bosch.com](mailto:RBRU.DSO.Privacy@bosch.com).

To assert your rights or to notify a data privacy incident use the following link:

<https://www.bkms-system.net/bosch-datenschutz>

## **Applying for positions advertised on our job portal**

The easiest way to apply for a job at Bosch is a direct application for a position advertised on one of our job portals. Your application will be assessed as per our internal processes.

Paper applications are entered manually in our applicant management system and then either returned to you or destroyed. You will receive an e-mail allowing you to activate your application once it has been manually entered in the system. If you do not activate your application within 30 days, your data will be deleted from our applicant management system and you will be removed from the selection process.

You also have the option to make use of your own personal network and submit your application via an associate of the Bosch Group. Simply forward your résumé to the associate, who will then upload it to the applicant management system. You will then receive an e-mail allowing you to activate your application. If you do not activate your application within 30 days, your data will be deleted from our applicant management system and you will be removed from the selection process. We can recognize that a Bosch associate has recommended you. The associate in question can see an overview of the status of your application, but cannot see any further details of your application process.

We keep you up to date on the status of your application by e-mail. You are free to edit your data or withdraw your application at any time during the application process. To do so, you require a SmartRecruiters profile, which you can create on the SmartRecruiters website.

During the application process, you will be alerted via e-mail about any other vacancies that may be of interest to you. If applicable, we may also offer you membership in a Bosch applicant community.

## **Membership in a Bosch applicant community**

If you are invited to join one of our Bosch applicant communities, you can publish your personal data to all HR departments of the Bosch Group. You are free to accept or reject the invitation to this community. If you accept, it enables us to inform you about the future vacancies and make your personal data available for these vacancies. As a member, you also have an option to contact HR managers directly, and will receive recruitment marketing information and invitations to events. You may delete your profile in the Bosch applicant community at any time.

## **Data categories processed**

The following are the main categories of personal data processed:

- Master data (e.g. name, date of birth, nationality, place of residence)
- Documents (e.g. references, certificates, résumés)
- Claims for travel expenses (e.g. bank account details)
- Communication data (e.g. e-mail address, (cell) phone number, IT user ID, audio and film recordings)
- Log data recorded while using IT systems

These may also include special categories of personal data such as health data.

## **Sources of personal data**

As a general rule, your personal data is collected directly from you during the application process.

When particularly sensitive positions are being filled, an additional check of your application data and background might be necessary. The result of this check will be documented in the applicant management system. If a background check is required, this information will be clearly stated in the job advertisement. These checks are carried out as per the local statutory regulations. For this purpose only carefully selected service providers are used.

The application process for our Junior Managers Program may entail submission of audio and video recordings. If such submissions are required, this information will be clearly stated in the job advertisement. These checks are carried out as per the local statutory regulations. For this purpose only carefully selected service providers are used.

## **Transfer of data upon recruitment**

If we recruit you for a position, your data will be transferred from our applicant management system to our HR administration systems, where it will be stored as associate data and processed accordingly.

## **Purposes of processing and legal bases**

We, and the external service providers we commission, process your personal data in compliance with the EU's General Data Privacy Regulation (GDPR), with the national data privacy laws and with any other applicable national laws. Your data is processed, in particular, during the applicant management process in preparation for an employment relationship with a legal entity of the Bosch Group.

The main legal basis for this purpose is GDPR Article 6 para. 1(b) ("in order to take steps at the request of the data subject (in this case applicant) prior to entering into a contract"). Other legal bases are:

- GDPR Article 6 para. 1(a) (Consent): e.g. for Bosch applicant community as part of the applicant management system
- GDPR Article 6 para. 1(f) (Legitimate interests): e.g. for HR evaluations (controlling, analytical reporting)

## **Special categories of data**

As far as special categories of personal data as per GDPR Article 9 para. 1 (e.g. data concerning health) are processed, such processing are carried out in accordance with GDPR Article 9 para. 2(b). Furthermore, it may be necessary to process this data in order assess your ability to work in accordance with GDPR Article 9 para. 2(h).

## **Disclosure of data**

Only the people involved in the application process (e.g. line managers and associates of the recruiting department, HR associates and associate representatives) have access to your personal data within the legal entity of the Bosch Group to which you have applied. Furthermore, your application data may be disclosed to other parties if you are deemed suitable for another vacant position within the Bosch Group. You will be informed about this via e-mail and your consent is required to activate any new application.

We will disclose your personal data to other data controller only if necessary for the application, if we or the third party has a legitimate interest in this disclosure, or if you have provided your consent. You will find the details of the legal bases in the section "Purposes of processing and legal bases." Other legal entities of the Bosch Group may also be defined as third parties. If data is disclosed to third parties on the basis of a legitimate interest, such cases will be explained in data privacy statement. In some cases, we also use the services of various providers in order to meet contractual and or statutory obligations. You will find a list of these contractors and service providers in the section "Contractors and service providers (data processors)." Additionally, we may disclose your personal data to other recipients outside the Bosch Group provided this is necessary to meet contractual or statutory obligations.

## **Contractors and service providers (data processors)**

We have selected our service providers carefully and monitor them at regular intervals, particularly to ensure that they handle your personal data with due care and store it securely. We obligate all our service providers to observe confidentiality and comply with the statutory regulations. Other legal entities of the Bosch Group may also be defined as service providers.

The following table shows the contractors and service providers with whom we have an ongoing business relationships:



<b>Service providers</b>	<b>Type of processing</b>
SmartRecruiters GmbH Dircksenstrasse 47 10178 Berlin, Germany SmartRecruiters SP. Z o.o. Fabryczna 20, 31-553 Kraków, Poland SmartRecruiters Inc. 225 Bush Street, San Francisco, CA 94104, USA	Provision and ongoing development of the cloud platform (Software as a Service) for the above-mentioned processing. Processing of personal data provided.
Amazon Web Services Inc. 10 Terry Avenue North Seattle, WA 98109-5210, USA	Provision and operation of the technical infrastructure for the cloud platform (Platform as a Service)
SendGrid Inc. 1801 California Street Suite 500 Denver, Colorado 80202, USA	Processing of e-mail communications between BOSCH and the applicant
LLC "New Information Systems" 1 <sup>st</sup> Mozhayskiy tupik, 8, bld. A-1 121059, Moscow, Russia	Processing of personal data from video interviews / selection process

**Disclosure to recipients outside the European Economic Area**

We disclose your personal data to contractors, service providers or Group companies located outside of the European Economic Area (EEA) only if the EU Commission has confirmed that the third country in question has appropriate levels of data privacy or if other appropriate data privacy guarantees (e.g. binding corporate regulations on data privacy or standard EU contractual clauses) are in place.

On request, we will provide you with a list of the recipients in third countries and a copy of the specifically agreed regulations to ensure appropriate levels of data privacy. Contact details for this purpose can be seen above in the 'Contact details of the data controller and the data privacy officer'.

**Duration of storage; retention periods**

We delete your personal data as soon as it is no longer required for the above-mentioned purposes or we no longer have any legitimate interest in its retention. After completion of the application process, your personal data is further stored if we are obligated for such storage under the national law. Furthermore, your personal data may be stored for the period during which claims may be made against us. If you are a member of one of our Bosch applicant communities, you may delete your profile yourself at any time.

**Security during data processing**

We take all the necessary technical and organizational measures to ensure appropriate levels of security and to protect your personal data particularly from the risks of unintended or unlawful destruction, manipulation, loss, alteration, or disclosure to or access by unauthorized third parties. We are constantly trying to improve our security measures and keep them state of the art.

**Rights of users**

If you wish to assert any of your rights, please refer to the Contact section. While contacting us, please ensure that you can be identified individually.

**Right of access:**

You are entitled to receive information from us about the processing of your data. You may assert your right of access with respect to any of your personal data processed by us.

**Right to rectification or erasure:**

You may demand that we correct the incorrect data and complete the incomplete data or erase your data; provided the statutory requirements are met.

This does not apply to the data that is required for invoicing or accounting purposes or that is subject to statutory retention periods. If access to such data is not required, processing of the data will be restricted (see below).

**Restriction of processing:**

Provided the statutory requirements are met, you may demand that we restrict processing of your data.

**Objection to data processing:**

You are also entitled to object at any time to our processing your data. In such cases we will cease processing your data unless we can demonstrate – in accordance with the statutory provisions – compelling legitimate basis to continue its processing that outweighs your interests.

**Objection to data processing in cases of “legitimate interest”:**

You are also entitled to object at any time to our processing your data, provided you can lawfully claim a legitimate interest. In such cases we will cease processing your data, unless we can demonstrate – in accordance with the statutory provisions – compelling legitimate grounds to continue its processing that outweighs your interests.

**Withdrawal of consent:**

If you have provided us your consent to process your data, you may withdraw it at any time with effect for the future.

This shall have no effect on the lawfulness of our processing of your data prior to withdrawal of consent. To withdraw your consent, please, send request to [TalentHubSupport@ru.bosch.com](mailto:TalentHubSupport@ru.bosch.com)

**Data portability:**

You are also entitled receive your data from us in a structured, commonly used and machine-readable format and/or – if technically possible – to demand transfer of that data to a third party.

**Right to complain to a data privacy authority:**

You are entitled to file a complaint with a data privacy authority. You can contact either the data privacy authority responsible for your place of residence or German federal state, or the data privacy authority responsible for the Bosch Group.

The data privacy authority responsible for the Bosch Group is:

Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit

Office address:

Königstrasse 10a  
70173 Stuttgart, Germany

Postal address:

P.O. Box 10 29 32  
70025 Stuttgart

GERMANY

Phone: +49 (0)711/615541-0

Fax: +49 (0)711/615541-15