



**BOSCH**

Tecnología para a vida

## Data protection notice for the applicant management process at Bosch Group

### We want you in our team

In this privacy notice, we inform you how your personal data is processed in the applicant management process at Bosch Group (in the following also “Bosch” or “we”/”us”). Additionally we inform you about your rights under applicable data privacy laws.

### 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.

### Controller

The Bosch Group legal entity to which you submit your application using the application management system is responsible for processing your data. You will find the contact details of the controller in the job advertisement in the application management system.

### 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, health related documents)
- Education and training details (e.g. data on primary/secondary/university education, professional qualifications)
- Payment data (e.g. bank account details for travel expenses)
- Organizational data in case of international applications (for example: personnel number, cost center, department)
- Communication data (e.g. e-mail address, (cell) phone number, IT user ID in case of internal applications)
- Audio-visual recording in the selection processes (e.g., for the Juniors Manager Program -JMP)
- Log data recorded while using IT systems

These may also include the processing of special categories of personal data such, as per art.9 section 1 GDPR, such as health data or union membership.

### Purposes of processing and legal bases

We process your personal data in compliance with the EU’s General Data Protection Regulation (GDPR) with the national data protection laws and with any other applicable national laws.



The personal data processing takes place during the applicant management process particularly for the purpose of preparation for an employment relationship with a legal entity of the Bosch Group.

The main legal basis for this purpose is the art. 6.1.b) GDPR together with national data protection laws (“in order to take steps at the request of the data subject prior to entering into a working contract”).

Other legal bases are:

- Art. 6.1.a) GDPR (consent) in conjunction with the respective national data protection law: e.g. for Bosch applicant community as part of the applicant management system
- Art. 6.1.f) GDPR (legitimate interest). We will always gently balance our legitimate interests in the organization of our business (e.g. HR evaluations like personal controlling, analytical reports) against your interest in protecting your personal data in accordance with statutory provisions.

Whenever special categories of personal data are processed as per article 9, section 1 of the GDPR in conjunction with the respective national data protection laws (for example, health data, trade union membership), this processing is carried out on the legal basis of art. 9.2.b) of the GDPR in conjunction with the respective national data protection law. Furthermore, it may be necessary to process your health data in order to assess your ability to work in accordance with Art. 9 para. 2(h) 1 GDPR in conjunction with the respective national data protection law.

## Children

This applicant management platform is not meant for children under 16 years of age.

## Collecting of personal data

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

The easiest way to apply for a job at Bosch is a direct application for a position advertised on one of our job portals, where you enter your data in the candidate profile created individually for the advertised position. You, hereby, have the possibility to send us the data by connecting to a social network, by a manual input and/or by making the upload of your CV.

The data from paper applications is transferred manually to the application system. You receive an email in order for you to activate your manually created application. If you do not activate your application within 30 days, your data is deleted from our applicant management system and you will not be considered any further in the selection process.

Additionally, you have the possibility to be referred by a Bosch Group employee. For this purpose, you need to give your application documents to this employee, who then uploads it in the application management system. You receive an email with which you can activate your application. If you do not activate your application within 30 days, your data is deleted from our applicant management system and you will no longer be considered any further in the



selection process. Your application is linked with the employee who uploaded it in the application system. This helps us in identifying that this employee has referred you. Furthermore, this employee can track the status of your application (invitation, rejection, etc.) on an overview page but has no access to the details of the application process.

We keep you up to date on the status of your application via email.

During the application process, we will ask you whether we are allowed to forward your application data to other suitable open positions.

Staffing of particularly sensitive job positions may require a further check of your application data on your career path. The result of this check is documented in the application management system. We inform you about such checks in a transparent manner in the framework of our job advertisements. This takes check place taking local legal requirements into consideration and by involving carefully selected service providers.

### Participation in Bosch recruiting events

Some Bosch locations organize Recruiting-Events in order to win potential candidates for multiple, similar job advertisement. Special events pages in different internet platforms inform about the contents of these events. You may apply for participation in these events by uploading your application in our application system via the link created for this purpose.

### Recipients of your personal data

#### - Within a legal entity of the Bosch Group

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 for the purposes mentioned above within the legal entity of the Bosch Group to which you have applied.

#### - Other legal entities within the Bosch Group

Other legal entities are data controllers themselves. The above mentioned persons involved in the recruiting process may belong to different companies of the Bosch Group. Therefore, your data may be transferred to the respective persons worldwide within the Bosch Group.

In case of your appointment, your data is transferred from our application management system to our HR-administration systems. In this process, your data may be transferred to a different legal entity and will thereafter be processed as employee data. An exchange of your personal data with other legal entities within the Bosch Group takes place especially in order to fulfill the contracts as well as due to our legitimate interest to organize the internal workflows (e.g. Shared Services, execution of transfers or relocation across legal entities).

#### - Recipients outside of the Bosch Group

We may disclose your personal data to other data controller only if necessary for the application, if the third party or we have 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".



### **- Data processors**

In addition, we use service providers to fulfil our contractual and legal obligations, among other things. Insofar as these service providers' processes personal data on our behalf, we have concluded the contracts required under data protection law with them.

We select our service providers carefully and monitor them on a regular basis, especially regarding their diligent handling and protection of the data that they store and process. All service providers are obliged to maintain confidentiality and to comply with the statutory provisions. Service providers may also be other companies of the Bosch Group.

You will find a list of our contractors and service providers (with whom we have a long-term or ongoing business relationship) in Annex 1.

### **Transfer to recipients outside the EEA**

We might transfer personal data recipients outside of the European Economic Area (EEA). In such case prior to the transfer, we ensure that either the respective country provides an appropriate level of data protection due to a decision of adequacy by the European Commission, or due to other appropriate safeguards (e.g. binding corporate rules on data protection or EU standard contractual clauses), or a legal basis authorises the transfer.

You are entitled to receive an overview of third country recipients and a copy of the specifically agreed-provisions securing an appropriate level of data protection. For this purpose, please contact the Controller mentioned above.

Should a transfer to recipients outside the European Economic Area (e.g. authorities, courts, parties of a lawsuit or advisors) be necessary for the enforcement/exercise of or defense against legal claims, this shall be done in accordance with Art. 49 para. 1 e) GDPR.

### **Duration of storage**

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 applicable national law.

After the selection process is finished (e.g. because your application has been rejected for the process or due to revocation of your consent) we will delete your data after the legally established time has elapsed.

### **Security**

Our employees and the companies providing services on our behalf are obliged to confidentiality and to compliance with the applicable data protection laws. We take all necessary technical and organizational measures to ensure an appropriate level of security and to protect your personal data particularly from the risks of unintended or unlawful destruction, manipulation, loss, alteration or unauthorized disclosure or unauthorized third



parties. We are constantly trying to improve our security measures and keep them state of the art.

## Your rights

To enforce your rights, please use the details provided in the Contact section. Please, make sure that we can unambiguously identify you.

- **Right to information and access:** you have the right to obtain confirmation from us about whether or not your personal data is being processed, and, if this is the case, access to your personal data.
- **Right to correction and deletion:** you have the right to obtain the rectification or inaccurate personal data. As far as statutory requirements are fulfilled, you have the right to obtain the completion or deletion of your data. This does not apply to data which is necessary for billing or accounting purposes or which is subject to a statutory retention period. If access to such data is not required, however, its processing is restricted (see the following).
- **Restriction of processing:** if the legal requirements are fulfilled, you can demand that we restrict the processing of your data.
- **Data portability:** if the legal requirements are fulfilled, you may request to receive data that you have made available to us in a structured, common and machine-readable format or - if technically feasible - to request that the data be transmitted to a third party.
- **Objection to data processing based on the legal basis of “legitimate interest”:** you have the right to object to the processing of your personal data at any time, insofar as this is based on legitimate interest. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements, which override your rights.
- **Withdrawal of consent:** in case you consented to the processing of your data, you have the right to revoke this consent at any time with effect for the future. The lawfulness of data processing prior to your withdrawal remains unchanged.

## Right to complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority. You can appeal to the supervisory authority, which is responsible for your place of residence or your state of residency, or to the supervisory authority responsible for us. This is:

Comissão Nacional de Proteção de Dados

Av. D. Carlos I, 134 - 1.º

1200-651 Lisboa / Portugal

Tel: +351 213928400 / Fax: +351 213976832 / e-mail: [geral@cnpd.pt](mailto:geral@cnpd.pt)

[www.cnpd.pt](http://www.cnpd.pt)



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## Adjustments to the Data Protection Notice

We reserve the right to adjust our security and data protection measures. In such cases, we will amend our data protection notice accordingly. Please, therefore, notice the current version of our data protection notice in the job advertisement.

## Contact

You can reach our data protection officer under:

Data Protection Officer (C/ISP)

Post office box 30 02 20

70442 Stuttgart, Germany

[dpo@bosch.com](mailto:dpo@bosch.com)

To assert your rights, please, use the following link: <https://request.privacy-bosch.com/>.

Should the legal entity to which your request refers not be selectable on the link paged or to notify data protection incidents, please, use the following link: <https://www.bkms-system.net/bosch-datenschutz>.

## Effective date

April 2021



## Annex 1

Service providers	Type of processing
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.
Viaso GmbH Badstr. 20, 13357 Berlin Deutschland	Processing of personal data from video interviews / creation
Signum GmbH Rungestrasse 19 10179 Berlin, Germany	Processing of personal data for background checks.
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.
Text Kernel BV Nieuwendammerkade 28A17 Amsterdam, Noord-Holland 1022 AB The Netherlands	Provision, operation and ongoing development of a CV parsing application.
I.K. Hofmann Projektmanagement GmbH Lina-Ammon-Str. 19 90471 Nürnberg	Processing of personal data from video interviews / selection process.