

## INFORMATION ON THE PROCESSING OF YOUR APPLICATION DATA

We hereby provide information on the processing of your personal data by Akiem Group and on your rights under data protection law.

If you apply for a position at Akiem SAS, Akiem Holding, mgw Service GmbH & Co. KG or any of our subsidiaries, your application will be managed by our central Akiem Group Human Resources team located in Paris, France and in Kassel, Germany.

### Who is responsible for data processing and who is the data protection officer?

#### The controller pursuant to Art. 4 point (7) of the GDPR is

Akiem Holding  
President: Fabien ROCHEFORT  
Street: EUROSQUARE 1, 151-161, Boulevard Victor Hugo  
Postcode and city: CS 60001 – FR-93452 Saint-Ouen Cedex

We use the services of the Neospheres platform as a processor to collect your application information. You can contact our **data protection officer**, Mr. Damien Coumert, s o f r a d e c, 153 Boulevard Haussmann F-75008 Paris, T +33 (0) 1 43 59 75 05, by writing to “The Data Protection Officer” at the above address or by email at [dpo@akiem.com](mailto:dpo@akiem.com). You can approach our data protection officer in English, German or French language.

### What categories of data do we use and where do these come from?

The categories of personal data we process for a recruitment are the following:

- first name, last name, name affixes such as academic degrees/titles
- contact data such as home address, (mobile) telephone number, email address
- The data from the entire application process (education, professional training, covering letter, CV, school reports and references, interviews, and any performance assessments, certificates, and previous employments)
- As far as appropriate to establish an employment relationship, other personal data (such as photo or health data, e.g. degree of disability) that you have voluntarily provided to us.

Your personal data are generally collected directly from you as part of the recruitment process. In addition, we may have obtained data from third parties (e.g. placement by the employment agency, recruitment agencies, other entities of Akiem group). The categories of personal data transmitted to us by third parties are generally identical to those mentioned above and have previously been communicated by you to these bodies.

In addition, as part of the application process, we may process personal data from publicly available sources, e.g. XING or LinkedIn, as far as they are relevant for the appreciation of your qualifications during the recruitment process and for the job in question.

### For what purposes are data processed and what is the legal basis for this?

We process your personal data in compliance with the provisions of the EU General Data Protection Regulation (GDPR) and all relevant national regulations (e.g. social security law, employment law, etc.) as they are effective in the countries where we recruit and employ.

The data are processed primarily in order to carry out and progress the application process and assess suitability for the job in question. Consequently, it is necessary to process your application data in order to decide about a basis for employment. The primary legal basis for this is Art. 6 subpara. 1 point (b) of the GDPR.

The processing of special categories of personal data is based on your consent pursuant to Art. 9 subpara. 2 point (a) of the GDPR.

If you have voluntarily provided us with such categories of personal data and their processing is functional for the decision to establish an employment, the collection and processing will take place on the basis of your consent given with the transmission

You may withdraw this consent at any time with future effect and object to processing. In this case, the personal data in question are erased.

Your applicant data will be treated confidentially at all times. We will only pass on your personal data to third parties, in particular legally independent subsidiaries and sister companies, if this is necessary to establish and/or carry out an employment relationship or if we are obliged by law to do so, e.g. in the context of criminal proceedings. If we should wish to process your personal data for a purpose not specified above, we first carry out a compatibility test in accordance with Art. 6 subpara. 4 of the GDPR in order to establish whether the new purpose is compatible with the original purpose. If this is the case, we will inform you of the other purpose and the eventual consequences for you.

#### **Who receives your data?**

Within our company, your personal data are only communicated to those people and functions (e.g. direct manager, functional manager, HR department, managing director ), who require your personal data for the decision on employment and in order to fulfil our contractual and legal obligations.

In addition, we may transmit your personal data to recipients outside the company. These include in particular our contract processors pursuant to Art. 28 of the GDPR (host and service providers).

#### **What data protection rights do you have as a data subject?**

You can request **information** on the data stored concerning you, free of charge from the above address. In addition, you can under certain preconditions request the **correction** or **erasure** of your data. You have a **right to restrict the processing** of your data and a **right to receive the data provided by you** in a structured, commonly used, and machine-readable format.

#### **Right of objection**

You have the right to object to the processing of your personal data for the purposes of direct advertising without giving reasons; please mind that we do not intend to do any direct advertising using applicant's data. If we process your data for the protection of legitimate interests, e.g. for an examination within the framework of the General Equality Act (AGG) or for the defence of claims under this act, you can object to this processing only for reasons arising from your particular situation. We will then cease to process your personal data unless we can demonstrate compelling legitimate reasons for the processing which override your interests, rights and freedoms or the processing is necessary for the establishment, exercise or defence of legal claims.



As a company conscious of our responsibilities, we do not use automated decision-making (e.g. software-supported applicant selection) in the context of the application process.

You can revoke your given consent at any time using the address mentioned above.

### **For how long are your data stored?**

We erase your personal data latest at the end of the sixth's months following the conclusion of the application process. This does not apply to the extent that legal provisions prohibit erasure or longer storage is necessary for the purposes of providing evidence or you have consented to longer storage.

Retention for this period is required for the defence of legal claims (in particular under the General Right to Equal Treatment) and is based on Art. 6 subpara. 1 point (f) of the GDPR. This does not apply to the extent that legal provisions prohibit erasure or longer storage is necessary for the purposes of providing evidence or you have consented to longer storage.

If your application was successful, we further process the data that you provided to us for the purposes of the forthcoming employment relationship. We will inform you separately on recruitment about the data processing in the context of the resulting employment contract.

If we are unable to offer you a vacant position, but are of the opinion, based on your profile, that your application could be of interest for a future job offer, we will process your personal application data for 24 months in our applicants' database, provided that we have your express consent to do so.

### **How do we transmit data outside Europe?**

We do not transmit your personal data to third countries outside the EU or the EEA.

If we pass personal data on to service providers outside the European Economic Area (EEA), this is only done provided that the EU Commission has confirmed that the third country has an appropriate level of data protection or other appropriate data protection guarantees (e.g. binding internal company data protection provisions or agreement to the EU Commission standard contractual clauses).

### **Are you obliged to provide your data?**

Your application requires the provision of the personal data necessary to carry out the application process and the assessment of your aptitude. Without such data, we will not be in a position to carry out the application process and take a decision on the basis for an employment relationship.

### **Do you want to complain about the handling of your data?**

You have the option to contact the above data protection officer or a data protection supervisory authority. The **data protection supervisory authority** responsible for us is:



In France (in French and English):

CNIL  
Commission Nationale de l'Informatique et des Libertés  
[www.cnil.fr](http://www.cnil.fr)

In Germany (in German and English):

Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit  
Husarenstr. 30  
53117 Bonn  
Allemanne  
[https://www.bfdi.bund.de/DE/Home/home\\_node.html](https://www.bfdi.bund.de/DE/Home/home_node.html)