

# Data Protection Information for Candidates

We hereby inform you about the processing of your personal data by Master Builders Solutions Holdings GmbH on behalf of all Master Builders Solutions companies and the rights you are entitled under data protection law.

Changes to our privacy policy may become necessary due to changes to our website and offers or due to changes in legal or official requirements. We reserve the right to make such changes at any time.

## **Who is responsible for data processing, who is our Data Protection Officer and who is our Service Provider?**

The controller responsible for data processing is

Master Builders Solutions Holdings GmbH  
Glücksteinallee 43-45,  
68163 Mannheim, Germany

You may also contact our Group data protection team using the above postal address or via e-mail at [dataprotection@masterbuilders.com](mailto:dataprotection@masterbuilders.com)

In Germany, you may contact our data protection officer:

Thomas Stegemann, Dacuro GmbH  
Otto-Hahn-Straße 3  
69190 Walldorf

Phone Number: +49 6227 - 78 93 930  
[www.dacuro.de](http://www.dacuro.de)  
[dsb@dacuro.de](mailto:dsb@dacuro.de)

### The service provider in charge of data processing is

Workable Software Single Member Private Company,  
with offices located at 95-97 Leoforos Kifissias,  
15125 Marousi,  
Greece

We use Workable, an online application provided by Workable Software Limited, to assist with our recruitment process. We use Workable to process personal information as a data processor on our behalf. Workable is only entitled to process your personal data in accordance with our instructions (its processing of job applicants' personal data is based on the Data Processing Agreement under art. 28 GDPR we closed with Workable.)

Where you apply for a job opening posted by Us or you are actively contacted by Us in connection with a job opening, these Data Protection Information provisions will apply to our processing of your personal information in addition to our other Data Protection Information which has been provided to you separately or is available on our Website (<https://www.master-builders-solutions.com/footer/privacy-notice>).

Where you apply for a job opening via the application function on a job site or similar online service provider ("Partner"), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner's data protection information.

### **What categories of data do we process and where does it come from?**

The categories of personal data processed include a.o.:

- Information disclosed on your professional social media profiles and other social media profiles, if linked to the professional ones;
- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method;
- Information disclosed on your social media profiles mentioned above when you are directly approached by us in the course of the active sourcing procedure;

- In particular, We process personal details such as name, e-mail address, address, country of residence, telephone number, date of birth, qualifications, experience, information relating to your employment history (curriculum vitae), degrees, skills, Information regarding your personal circumstances (e.g. cover letter, career interests), which may also include special categories of personal data (e.g. information on a severe disability) as well as your video in case you conduct your interview using the Video Interview feature;
- If you contact us, we will keep a record of that correspondence;
- A record of your progress through any hiring process that we may conduct;
- Details of your visits to Workable's Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Workable's Website and the resources that you access;
- Your video interview in case your interview was performed through the video interview feature.

We collect and store your personal data when you provide it to us by:

- registering on our career portal
- creating and updating your candidate profile
- applying for a job with your data
- being added to our talent pool
- sending us your data by e-mail or post
- providing us with your data at a career fair or other events

### **Why and according to which legal basis is the data processed?**

We will only process data in connection with your job-application in order to perform pre-employment-contractual measures.

By registering in the career portal, you are expressing interest in working for us or for a company within Master Builders Solutions and agree to the collection, processing and use of the provided

information for the purposes described here. Registration is a necessary step in the application process and is intended to make it as easy as possible for you to apply for various positions.

It is up to you to decide whether you want to apply for future vacancies in addition to your specific application and therefore agree that your data will be stored in our talent pool. If you choose to do so, you will be asked via e-mail to consent to it under art. 6 para. 1 section a) GDPR.

We process your personal data in accordance with the provisions of the General Data Protection Regulation ("GDPR") and the German Federal Data Protection Act ("BDSG") for the purposes of establishing, carrying out and fulfilling contracts as well as to perform pre-contractual measures.

Insofar as the provision of personal data is necessary to initiate or execute contractual relationships or in connection with performing pre-contractual measures, the legal basis for the processing is Art. 6 para. 1 section b) GDPR in conjunction with Art. 26 para. 1 BDSG.

If you are actively contacted by Us via social media, we process your personal data on the basis of art. 6 para. 1 section f) GDPR (active sourcing). You will be then asked for your consent regarding the processing of your data in connection with the particular job opening.

If you consent to the processing of your personal data for specific purposes (e.g. talent pool), the lawfulness of this processing shall be determined on the basis of your consent pursuant to Art. 6 para. 1 section a) GDPR. Consent that has been granted can be withdrawn at any time and without giving reasons. Please note that the withdrawal only applies to the future. Processing that took place prior to the withdrawal shall not be affected thereby.

We will also process your data in order to fulfill legal obligations in connection with your job-application in accordance with Art. 6 para. 1 section c) GDPR (e.g. the European regulations 2580/2001 and 881/2002 require us due to the dual use nature of our products to compare your data with the "EU terror lists" in order to ensure that no funds or other economic resources are used for terrorist purposes.)

Should the data processing be necessary to protect a legitimate interest of the person responsible or of a third party and should the interests, fundamental rights and freedoms of the data subject not outweigh the former interest, Art. 6 para. 1 1<sup>st</sup> sentence section f) GDPR shall serve as the legal basis for the processing. For instance, this applies to any investigations concerning criminal offences (legal basis Art. 26 para. 1 2<sup>nd</sup> sentence BDSG). If necessary, we shall inform you separately by stating the legitimate interest, insofar as this is required by law.

If we would like to process your personal data for a purpose not mentioned above, we will inform you of this in advance.

### **How do we protect your data?**

We take all appropriate technical and organizational measures to protect your data against accidental or deliberate manipulation, partial or complete loss, destruction, or unauthorized access by third parties in accordance with the requirements of Art. 32 GDPR. Our security measures are continuously improved as the technology develops.

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

Within our company, we pass on your personal data exclusively to those departments and persons (e.g. human resources department, specialist department, works council, representatives for severely handicapped employees) and service providers (Workable) who need this data to fulfil contractual and legal obligations or to pursue our legitimate interests.

Master Builders Solutions Holdings GmbH is a company of Master Builders Solutions. Since we are a global company, we use our same recruiting system in different countries. Therefore, your personal data may be transferred across national borders to any company within Master Builders Solutions. We protect your personal information worldwide by implementing internal policies and complying with local laws and regulations governing the collection and use of information.

Your personal data will not be passed on to third parties outside Master Builders Solutions unless required or permitted by law, if it is necessary to do so, or a legitimate interest is at stake, or you have given your consent. If we transfer personal data to service providers or Master Builders Solutions companies outside the European Economic Area (EEA), the transfer will only take place if the European Commission has confirmed that the third country has an adequate level of data protection or if other appropriate data protection safeguards (e.g. binding corporate rules or EU standard contractual clauses) are in place. Should we wish to transfer your personal data to service providers or Master Builders Solutions companies outside the EEA, we will inform you of this in advance.

### **Which data protection rights can you exercise as a data subject?**

You have the right of access according to Art. 15 GDPR, the right to rectification according to Art. 16 GDPR, the right to erasure according to Art. 17 GDPR, the right to restriction of processing



according to Art. 18 GDPR, the right to notification according to Art. 19 GDPR and the right to data portability according to Art. 20 GDPR.

Insofar as processing is carried out to safeguard legitimate interests in accordance with Art. 6 para. 1 1<sup>st</sup> sentence section e) or f) GDPR (e.g. active sourcing), you have the right under Art. 21 GDPR to object to the processing of this data at any time for reasons resulting from your particular circumstances. You can object to the processing directly in your profile on Workable or by sending an e-mail to [dataprotection@masterbuilders.com](mailto:dataprotection@masterbuilders.com) or [dsb@dacuro.de](mailto:dsb@dacuro.de). We will then stop processing your personal data unless we can provide proof of compelling reasons for the processing that are worthy of protection, that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Insofar as the data is processed on the basis of your consent, you are entitled under Art. 7 GDPR to withdraw your consent regarding the use of your personal data at any time. You can object to the processing directly in your profile on Workable or by sending an e-mail to [dataprotection@masterbuilders.com](mailto:dataprotection@masterbuilders.com) or [dsb@dacuro.de](mailto:dsb@dacuro.de). Please note that the withdrawal only applies to the future. Processing that took place prior to the withdrawal shall not be affected thereby. Please also note that we may need to store some of your data for a certain period of time to comply with legal requirements.

You can access and update the data you have provided in your profile on Workable at any time. If you discover that your personal data stored with us is incorrect or outdated, you have the right to verify and correct it directly in the Career Portal. You are solely responsible for ensuring that this data is true and correct.

You can withdraw your application at any time via your candidate profile as well as delete your profile. Please note that any active applications will be withdrawn automatically. Your profile with all your personal data will be immediately blocked and deleted as part of our regular deletion schedule.

If you would like to receive automated notifications about new job offers, you can specify this when creating your candidate profile or at any time afterwards under the tab "Options" and "Job notifications". You can create detailed search profiles and will be notified by e-mail for the duration of the time period you choose. If you no longer wish to receive such e-mails in the future, you can deactivate the job notifications at any time. If you have deleted your profile, you will no longer receive job notifications.

### **Where can you lodge a complaint?**

Should you believe that the processing of your personal data violates the GDPR, you have the right to complain to a supervisory authority, in particular in the member state where you reside or work, or where a suspected infringement has occurred, irrespective of any other administrative or judicial remedy.

The supervisory authority with which the complaint has been lodged shall inform the complainant of the status and outcome of the complaint, including the possibility of a judicial remedy in accordance with Art. 78 of the GDPR.

Moreover, you can lodge a complaint with our designated supervisory authority:

Der Landesbeauftragte für den Datenschutz  
und die Informationsfreiheit Baden-Württemberg  
[Lautenschlagerstraße 20, 70173 Stuttgart](https://www.datenschutz.bw.de/)

### **How long is personal data stored?**

We store your personal data for the duration of the job application process and as long as we have a legal base regarding their storage. In other words, we will delete your no longer than data six months after the relevant application procedure has been completed (e.g. in the form of a job offer or a rejection), unless other legal provisions stipulate longer retention periods. After that, the application is made anonymous in our application system. You can withdraw your application and end the application process at any time. If you are hired, we reserve the right to keep your application for a longer period of time if your start date is more than six months in the future.

If your personal data is stored in the talent pool, your data will be deleted in accordance with the relevant data protection policies mentioned above, with the stipulation that if you have not revised or used your profile for a period of twelve months, we will send you an e-mail requesting you to update your data. If you fail to update your data or to actively confirm that the data is still up-to-date, we will remove you from the talent pool and delete your personal data as part of our regular deletion schedule.

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

We only process data that we receive from you or that you supply to us via other sources (e.g. over the telephone). In accordance with Art. 13 para. 2 section e) GDPR, we would like to point out that you are not obliged to provide us with your data. Without your data, however, we are not able to include you in the application process.

**To what extent do automated individual decisions or profiling measures take place?**

We do not use purely automated processing to bring about a decision regarding the conclusion of an employment agreement. This decision is made by the authorized staff of Master Builders Solutions. Any IT or AI tools play only an auxiliary role in the job application process.

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