



Translations available [here](#)

Data Privacy Statement

Data controller (the “**Company**”): Amcor Group GmbH, Thurgauerstrasse 34, 8050 Zurich (“**Amcor**” or “**we**” or “**our**”) or any of its affiliates and subsidiaries (collectively, the “**Amcor Group**”), depending on which entity has posted the job offer to which you are applying, takes data privacy seriously. You can check the list of the Amcor Group entities, including their addresses, by clicking [here](#).

Introduction

As part of our recruitment process, the Company collects and processes personal information, or personal data, relating to job applicants. This personal information may be held by the Company on paper or in electronic format.

The Company is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the General Data Protection Regulation (“**GDPR**”). The purpose of this privacy notice is to make you aware of how and why we will collect and use your personal information during the recruitment process. We are required under the GDPR to notify you of the information contained in this privacy notice.

This privacy notice applies to all job applicants. It is non-contractual.

If you have any questions about this notice or if you want to exercise your rights, please contact us at: privacy@amcor.com.

Content Overview

1. [Data protection principles](#)
2. [What personal data do we process about you and why?](#)
3. [How do we collect your personal information?](#)
4. [What is the legal justification for processing your personal data and what happens if you choose not to provide your personal data?](#)
5. [Why and how do we use your sensitive personal information?](#)
6. [Who has access to your data?](#)
7. [How does the Company protect your personal information?](#)
8. [Transferring personal information outside the European Economic Area](#)
9. [How long do we keep your personal data?](#)
10. [What rights do you have and how can you assert your rights?](#)
11. [Do we use cookies and other tracking technologies?](#)
12. [Questions and contact information](#)
13. [Changes to this privacy notice](#)

1. Data protection principles

Under the GDPR, there are six data protection principles that the Company adheres to. These provide that the personal information we hold about you is:



1. Processed lawfully, fairly and in a transparent manner;
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes;
3. Adequate, relevant and limited to what is necessary in relation to those purposes;
4. Accurate and, where necessary, kept up to date;
5. Kept in a form which permits your identification for no longer than is necessary for those purposes;
6. Processed in a way that ensures appropriate security of the data.

2. What personal data do we process about you and why?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymous data, i.e., where all identifying particulars have been removed.

There are also "special categories" of personal information and personal information on criminal convictions and offences, which require a higher level of protection because it is of a more sensitive nature.

The special categories of personal information comprise information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

The Company collects, uses and processes a range of personal information about you during the recruitment process. This includes:

- your contact details, including your name, address, telephone number and personal e-mail address
- personal information included in a CV, any application form, cover letter or interview notes references
- information about your right to work in specific countries and copies of proof of right to work documentation
- copies of qualification certificates
- copy of ID
- other background check documentation
- details of your skills, qualifications, experience and work history with previous employers
- your professional memberships.

Where necessary and authorized by local law, the Company may also collect, use and process the following special categories of your personal information during the recruitment process:

- whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process;
- information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation;
- information about criminal convictions and offences.

In connection to the use of our job positing portal (the "**Website**"), please note that you may use the Website without providing any personal data about you. In this case, we will collect the following metadata that result from your use of the Website: browser type and version, operating system and interface, your domain name, if applicable, the website from which you are visiting us (referrer URL), webpage(s) you are visiting on our Website, the documents you download, the date and time of accessing our Website, and your internet protocol (IP) address.



Your IP address will be used (i) to enable your access to our Website; (ii) to improve the quality and services of our Website; and (iii) to provide you with tailored marketing content.

3. How do we collect your personal information?

The Company collects personal information about you during the recruitment process either directly from you or sometimes from a third party such as an employment agency. We may also collect personal information from other external third parties, such as references from current and former employers, information from background check providers, information from credit reference agencies and criminal record checks.

The Company will only seek personal information from third parties during the recruitment process once an offer of employment or engagement has been made to you and we will inform you that we are doing so.

You are under no statutory or contractual obligation to provide personal information to the Company during the recruitment process. Your personal information may be stored in different places, including on your application record, in the Company’s HR management system and in other IT systems, such as the e-mail system.

4. What is the legal justification for processing your personal data and what happens if you choose not to provide your personal data?

We rely on the following legal grounds for the collection, processing, and use of your personal data:

Purposes of the processing	Legal basis
Register as a job applicant on the Website.	The processing is necessary for the performance of a contract to which the data subject is a party or for the implementation of pre-contractual measures at his or her request.
Manage the recruitment process and assess your suitability for employment or engagement.	The processing is necessary for the performance of a contract to which the data subject is a party or for the implementation of pre-contractual measures at his or her request.
Decide on the recruitment and/or appointment of job applicants.	Legitimate interest of the Company in hiring adequate candidates to cover its business needs.
Comply with statutory and/or regulatory requirements and obligations, e.g., checking your right to work in a certain location.	The processing is necessary for compliance with a legal obligation applicable to the Company.
Comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations.	The processing is necessary for compliance with a legal obligation applicable to the Company.
Ensure effective HR, personnel management and business administration.	Legitimate interest of the Company in organizing its business in line with its commercial, organizational and economic interests.
Monitor equal opportunities.	Legitimate interest of the Company in the implementation of policies guaranteeing equal opportunities and conditions for all job applicants.
Processing of personal data connected to the use of the Website to:	(i), (ii) and (v): Legitimate interest of the Company in promoting its brand, improving the user experience and quality of its services.



(i) improve its quality and the services offered through the same, (ii) tailor marketing materials by analyzing the usage behavior of its users in anonymized form, (iii) prevent fraud and misuse of its IT systems, (iv) ensure physical, IT and network security and (v) provide you with marketing materials if no consent is required.	(iii) and (iv): Protecting the Company and users against fraud and any other illicit activities, ensuring the security of its products and services.
Anonymization of the data.	Legitimate interest of the Company in giving use to anonymized information for various purposes (enhancement of the recruiting process, market analysis, etc.).

The provision of your personal data is not required by a statutory or contractual obligation. However, the provision of your personal data is necessary to participate in the recruitment process or enter into a contract with us. The provision of your personal data is voluntary for you.

If you do not provide your personal data or if you fail to provide certain personal information when requested, we may not be able to process your job application properly or at all, we may not be able to enter into a contract with you, or we may be prevented from complying with our legal obligations.

5. Why and how do we use your sensitive personal information?

We will only collect and use your sensitive personal information, which includes special categories of personal information and information about criminal convictions and offences, when the law allows us to.

Some special categories of personal information, i.e., information about your health, and information about criminal convictions and offences or information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation is processed so that we can perform or exercise our obligations or rights under employment law and in line with our data protection policy.

When the law allows us to do so, we may also process information about your health and information about any criminal convictions and offences where we have your explicit written consent. In this case, we will first provide you with full details of the personal information we would like and the reason we need it, so that you can properly consider whether you wish to consent or not. It is entirely your choice whether to consent. Your consent can be withdrawn at any time.

Where the Company processes other special categories of personal information, i.e., information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation, this is done only for the purpose of equal opportunities monitoring in recruitment. Personal information that the Company uses for these purposes is either anonymized or is collected with your explicit written consent, which can be withdrawn at any time. It is entirely your choice whether to provide such personal information.

We may also occasionally use your special categories of personal information, and information about any criminal convictions and offences, where it is needed for the establishment, exercise or defense of legal claims.

6. Who has access to your data?



Your personal information may be shared internally within the Company for the purposes of the recruitment exercise, including with members of the HR department, members of the recruitment team, managers in the department which has the vacancy and IT staff if access to your personal information is necessary for the performance of their roles.

The Company might also share your personal information with third parties acting as data processors, during the recruitment process that support us in the recruitment process, specifically:

- external organizations for the purposes of conducting pre-employment reference and employment background checks;
- external organizations that offer specific tools for the recruitment process (for example video interviewing);
- our professional advisors, such as HR advisors or lawyers.

In some cases, we may need to share your personal information with regulatory authorities or other third parties to comply with legal requirements, to facilitate the recruitment process, or where it is necessary for entering into an employment contract with you, or to protect our legitimate interests (or those of a third party).

7. How does the Company protect your personal information?

The Company has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorized way.

In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities.

Where your personal information is shared with third parties, we require all third parties to take appropriate technical and organizational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection laws.

We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

8. Transferring personal information outside the European Economic Area

Due to the global nature of our operations, the Company might transfer your personal information to recipients located in countries outside the European Economic Area (“**EEA**”) which do not provide an adequate level of data protection as defined by data protection laws in the EEA, Switzerland or the UK. These transfers will be made taking into account all necessary legal safeguards and following a privacy impact assessment of the transfer in question (such safeguards will generally include the conclusion of standard contractual clauses approved by the European Commission and, where necessary, the implementation of additional, usually technical, protection measures, such as encryption of the data). To obtain a copy of the safeguards or for further details about international data transfers, please contact us (See “Contact Information,” below).

9. How long do we keep your personal data?



The Company will only retain your personal information for as long as is necessary to fulfill the purposes for which it was collected and processed.

If your application for employment or engagement is unsuccessful, the Company will generally retain your personal records for two years following the conclusion of the relevant recruitment process, after which they will be securely destroyed.

However, this is subject to:

- If you have consented to the Company keeping your personal information on file, in case there are future suitable employment opportunities with us, the Company will hold your personal information for a further six months after the end of the relevant recruitment exercise, or until you withdraw your consent if earlier.
- If your application for employment or engagement is successful, personal information gathered during the recruitment process will be retained for the duration of your employment or engagement and in accordance with the privacy notice for employees, workers and contractors.
- Personal information which is no longer retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances, we may anonymize your personal information so that it no longer permits your identification. In this case, we may retain such information for a longer period.

10. What rights do you have and how can you assert your rights?

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- request access to your personal information – this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- request rectification of your personal information – this enables you to have any inaccurate or incomplete personal information we hold about you corrected;
- request the erasure of your personal information – this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g., it's no longer necessary in relation to the purpose for which it was originally collected;
- restrict the processing of your personal information – this enables you to ask us to suspend the processing of your personal information, under certain circumstances, e.g., if you contest its accuracy and so want us to verify its accuracy;
- object to the processing of your personal information – this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and we do not have compelling legitimate grounds for the processing which override your interests, rights and freedoms;
- data portability – this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, you can do this either via your online profile as a self-service or please contact us at: privacy@amcor.com.



We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal.

If you wish to withdraw your consent, you can do this either via your online profile or please contact us at: privacy@amcor.com.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis, for processing.

11. Do we use cookies and other tracking technologies?

The Website uses cookies and other tracking technologies. For further information, please read our Cookie Policy [here](#).

For additional information on how Amcor processes personal data, please access our website privacy policy [here](#).

12. Questions and contact information

If you have any questions about this notice or if you want to exercise your rights as stated above in Section 10, please contact us through either of:

- privacy@amcor.com
- Amcor Group GmbH, Thurgauerstrasse 34, 8050 Zurich, +41 (0)44 316 17 17
- You can check the list of the Amcor Group entities, including their addresses, by clicking [here](#).

13. Changes to this privacy notice

The Company reserves the right to update or amend this privacy notice at any time.