



Privacy policy

for personnel marketing and the application process at MHP Consulting UK Limited

We, MHP Consulting UK Limited (hereinafter referred to as "we" or "MHP"), appreciate your interest in our online offering (hereinafter referred to as the "Online Offering"). We take the protection of your personal data very seriously. Your personal data is processed exclusively in accordance with the statutory provisions of data protection law, in particular the UK General Data Protection Regulation (hereinafter referred to as "GDPR"). With this data protection declaration, we inform you about the processing of your personal data and about your data protection rights in the context of personnel marketing and applications at MHP. For information on the processing of personal data in other areas, please refer to the respective specific privacy policy.

If we refer to this privacy policy from external social media profiles, the following explanations only apply insofar as the processing takes place in our area of responsibility and insofar as no more specific and therefore overriding information on data protection is provided in the context of such social media profiles.

1. Responsible person and data protection officer

Responsible for data processing within the meaning of data protection laws is:

MHP Consulting UK Limited
Bath Road
Calcot
Reading
England
RG31 7SE
info@mhp.com

If you have any questions or suggestions regarding data protection, please do not hesitate to contact us. You can contact our data protection officer as follows:

MHP Consulting UK Limited
Bath Road
Calcot
Reading
England
RG31 7SE
dataprivacy@mhp.com

We are joint controllers with other Porsche AG Group companies with regard to processing in the context of internal Group administration and division of labour through centralised systems. The joint processes relate to the operation and use of shared databases, platforms and IT systems. With regard to the joint processes, we determine the purposes and means of processing personal data together with the respective Group companies. In an agreement with the relevant Group companies on joint re-

sponsibility in accordance with Article 26 GDPR, we have defined how the respective tasks and responsibilities for the processing of personal data are structured and who fulfils which data protection obligations. You can find an overview of these companies at any time in the data protection information at <https://jobs.porsche.com>.

MHP Consulting UK Limited is solely responsible under data protection law for the processing of your specific application.

2. Subject matter of data protection

The subject of data protection is the protection of personal data. This is all information that relates to an identified or identifiable natural person (data subject). This includes information such as name, postal address, e-mail address or telephone number, but also other information that arises during the application process, such as information about your qualifications, education or professional background.

3. Purposes and legal bases of data processing

Below you will find an overview of the purposes and legal bases of data processing in the context of personnel marketing and the application process at MHP. In any case, we process personal data in accordance with the legal requirements, even if a legal basis other than that stated below should be relevant in individual cases.

If an employment relationship is established with you, further data processing is governed by the privacy policy for the employment relationship.

The provision of personal data by you may be required by law or contract or may be necessary for the conclusion of a contract. We will inform you separately if you are obliged to provide personal data and the possible consequences of not providing it (e.g. a loss of claims or our notification that we cannot provide the requested service without providing certain information). The use of the online offer is generally possible without registration. The use of individual services and functions may require prior registration. Even if you use our online services without registering, personal data may still be processed.

3.1 Fulfilment of contractual and pre-contractual obligations

We process your personal data if this is necessary for the implementation of the application process and, if applicable, for the preparation of an employment relationship with you. Data processing is carried out on the basis of Article 6(1)(b) GDPR.

We process personal data insofar as this is necessary to carry out the application process and, if applicable, to prepare an employment relationship with you. The purposes include in particular

- Recording and checking the application
- Application management and implementation of the selection process (forwarding to the relevant internal functions, organisation and implementation of interviews, management and administration of recruitment)
- For internal applicants for internal programmes: Application management and implementation of the selection process

If you provide us with special categories of personal data within the meaning of Article 9(1) GDPR as part of the application process, they will also be processed in accordance with Article 9(2)(b) GDPR.

If an employment relationship is not established, your data will be anonymised by us after four months, unless another legal basis applies. If another legal basis applies, we will anonymise the data once that other legal basis no longer applies. It will then no longer be possible to draw conclusions about your person. Data processing after anonymisation only takes place for statistical evaluation purposes.

3.2 Fact check

We conduct a review of your personal data to ensure that potential employees perform their duties without conflicts of interest and in compliance with high ethical standards and are committed to the company's principles.

[The verification of personal data includes your personal data (surname, first name, date of birth, address) and the presentation of your original identity card or a comparable document proving your identity, the presentation of your original certificates (in particular the last certificate of the highest level of education) or an officially certified copy thereof in paper form. We will also check whether you have already been employed by MHP and – limited to this case and in compliance with data protection regulations – whether any written disciplinary measures have been taken against you in the last three calendar years. For this purpose, personal data in the existing personnel file for the past three calendar years will be queried.]

The fact check is carried out by the responsible HR department. [Only a limited number of people are authorised to access your data internally. In the event of negative findings in the fact check, the results are discussed in a committee (specialist department, HR department, works council). The result of the consultation is documented and filed in the personnel file.]

[For new hires at the Director, Senior Sales Director, Associated Partner, Executive Director and Partner levels, the completed fact check checklist and the completed self-disclosure form are stored in the personnel file and remain there in accordance with the deletion period for relevant personnel documents and data. No other data storage or processing takes place. The fact check checklist and the self-disclosure form will be deleted from the personnel file after four months for external candidates who are not hired and after three years for all other cases.]

3.3 Job subscription

To subscribe to the "Job Abo" newsletter, all you need to do is enter your email address and state how often you would like to receive the "Job Abo" newsletter. Newsletters are only sent after you have registered, i.e. with your consent on the basis of Article 6(1)(a) GDPR. If the contents of the "Job Abo" newsletter are specifically described in the context of a registration, these are decisive for the scope of the consent. In addition, the "Job Abo" newsletter contains information about your career opportunities at MHP and other Group companies.

Registration takes place by means of the so-called double opt-in procedure, i.e. after your registration you will receive an e-mail in which you will be asked to confirm your registration in order to prevent misuse of your e-mail address. The registrations are logged by us in order to be able to prove the registration process and the consent contained therein in accordance with the legal requirements. The logging of the registration and the necessary processing of the data entered by you during registration is therefore carried out on the basis of legitimate interests in accordance with Article 6(1)(f) GDPR. You can revoke your consent to receive the "Job Abo" newsletter at any time, e.g. by unsubscribing from the newsletter. You will find an unsubscribe link to exercise this right at the end of each newsletter.]

3.4 Application account

The application account allows you to send and manage your application to us or other Group companies via the electronic application system or to monitor job offers. We recommend that you use the application account, as the internal processes and implementation of the application procedure at MHP and the other Group companies are harmonised with this. Even if you send us your application by other means, the application will be scanned as part of our internal processes and the information will be processed electronically. You will then receive your paper documents back by post.

If you would like to set up an application account, registration is required. Your registration details (user name and password) are collected and processed when you register and log in.

As part of the application account, you have the option of setting up an applicant profile. You can use an online questionnaire to enter or upload your personal data (e.g. form of address, title, surname, first name, date of birth, place of birth, country of birth, nationality, address, telephone number, e-mail address), your qualifications (e.g. educational background, professional experience

if applicable, language skills, IT skills), your application documents (e.g. letter of motivation, application documents) and other application information (e.g. desired salary if applicable, availability if applicable). Corresponding mandatory fields are marked in the online questionnaire.

This data is processed on the basis of Article 6(1)(b) GDPR in order to create your application account with your applicant profile to carry out the respective application procedure and – if you have given your consent – as part of the review of your application in the Porsche Group or the Talent Pool on the basis of Article 6(1)(a) GDPR.

If you delete your application account, your user profile will also be deleted. With regard to the deletion of data relating to specific applications at MHP, the provisions under this section 3 apply. With regard to the deletion of data relating to specific applications at other Group companies, the provisions of the corresponding data protection notices apply (see section 1).]

3.5 Fulfilment of legal obligations

We also process your personal data in order to comply with legal obligations to which we are subject. These obligations may arise, for example, from commercial, tax, money laundering or financial law. Measures in the area of health management and aptitude tests may also result from legal obligations.

Data processing is carried out on the basis of Article 6(1)(c) GDPR. In this respect, we process those personal data that are necessary for the fulfilment of the legal obligation.

We delete the data after the legal obligation no longer applies and if no other legal basis applies. If another legal basis applies, we delete the data after that other legal basis no longer applies.

3.6 Safeguarding legitimate interests

We also process your personal data to protect our legitimate interests or those of third parties, unless your interests, which require the protection of your personal data, take precedence. Data processing is carried out on the basis of Article 6(1)(f) GDPR. Processing to protect legitimate interests is carried out for the following purposes or to protect the following interests:

- Operational reporting
- Implementation and optimisation of personnel marketing and the recruitment process (implementation of personnel marketing consulting, applicant surveys and statistical evaluations)

When you access the online offer, data relating to your end device and your use of the online offer is processed and stored in a log file. This relates in particular to technical data such as the date and time of access, duration of the visit, type of end device, operating system used, functions used, amount of data sent, IP address and referrer URL. We process this data to ensure technical operation and to identify and rectify faults. In doing so, we pursue the interest of ensuring technical functionality in the long term. We do not use this data for the purpose of drawing conclusions about your person.

3.7 Consent

We process your personal data on the basis of your consent. Data processing is carried out on the basis of Article 6 (1) (a) GDPR. If you give your consent, this is always for a specific purpose; the purposes of the processing are determined by the content of your declaration of consent. You can withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

If you have given your consent for specific purposes, such as for the review of your application in other Group companies, for inclusion in a talent pool [or to receive the "Job Abo" newsletter], the purposes are determined by the respective content of this consent.

We delete the data if you have withdrawn your consent and no other legal basis applies. If another legal basis applies, we will erase the data once that other legal basis no longer applies.

3.8 Change of purpose

Insofar as we process your personal data for a purpose other than that for which the data was collected, we take into account the compatibility of the original and the now pursued purpose, the type of personal data, the possible consequences of further processing for you and the guarantees for the protection of personal data in accordance with Article 6(4) GDPR.

3.9 Profiling

We do not carry out automated decision-making or profiling in accordance with Article 22 GDPR. Profiling is only carried out to protect our legitimate interests as described above.

4. Access authorisations in the end device

Some functions of our online offering require you to grant authorisation to access your end device (e.g. access to location data). The granting of authorisations is voluntary. However, if you wish to use the corresponding functions, it is necessary to grant the corresponding authorisations, as otherwise you will not be able to use these functions. The authorisations remain active as long as you have not reset them in your end device by deactivating the respective setting.

5. Cookies and comparable technologies

We use cookies and similar technologies as part of the online offer, which serve to communicate with your end device and exchange stored information (hereinafter collectively referred to as "cookies"). These cookies are primarily used to make the functions of the online offer usable. General examples in which the use of cookies is technically necessary in this sense are the storage of a language selection, login data or a shopping or watch list. Accordingly, we may use technically necessary cookies to enable the processing described in section 3.1 and to ensure the proper and secure operation of the online offering. The data processing is then carried out on the basis of Article 6 (1)(b) and (f) GDPR, as it is necessary to implement the functions you have selected or to safeguard our legitimate interest in the functionality of the online offering.

If we also use cookies in order to analyse the use of the online offer and to be able to target it to your interests and, if necessary, to be able to provide you with interest-based content and advertisements, this is done exclusively on the basis of your voluntary consent in accordance with Article 6(1)(a) GDPR. You then have the option of making the appropriate settings via the consent management function within the online offering. You can revoke your consent at any time. Further information on cookies and their function in detail as well as on setting and revocation options can be found directly in the corresponding areas of consent management. Please note that we only provide consent management as part of the online offering if cookies are to be used on the basis of consent in addition to the technically required cookies mentioned above.

If you do not wish cookies to be used in general, you can also prevent them from being stored by making the appropriate settings on your end device. You can delete stored cookies at any time in the system settings of your end device. Please note that blocking certain types of cookies may result in impaired use of our online services.]

6. Integrated third-party services

Insofar as we integrate services from other providers as part of our online offering in order to offer you certain content or functions (e.g. playing videos or route planning) and we process personal data in the process, this is done on the basis of Article 6(1)(b) and (f) GDPR. This is because the data processing is then necessary to implement the functions you have selected or to protect our legitimate interest in optimising the functionality of the online offering. Insofar as cookies may be used in the context of these third-party services, please see section 5. Please also refer to the privacy policy of the respective provider with regard to the third-party services.

Services from other providers that we include or to which we refer are provided by the relevant third parties. The third-party services also include offers from other Porsche AG Group companies and Porsche Centres. We have no influence on the content and function of the third-party services and are not responsible for the processing of your personal data by their providers, unless the third-party services are designed entirely on our behalf and then integrated by us under our own responsibility. Insofar as the integration of a third-party service leads to us establishing joint processes with its provider, we will define with this provider in an agreement on joint responsibility in accordance with Article 26 GDPR how the respective tasks and responsibilities for the processing of personal data are structured and who fulfils which data protection obligations. If cookies are also to be set on the basis of your consent, you will receive further information on the responsibility for setting these cookies or any associated third-party services in the corresponding areas of consent management.

Unless otherwise stated, profiles on social media are only integrated into our online offering as a link to the corresponding third-party services. After clicking on the integrated text/image link, you will be redirected to the website of the respective social media provider. After forwarding, personal data may be collected directly by the third-party provider. If you are logged into your user account with the respective social media provider during this time, the provider may be able to assign the information collected from the specific visit to your personal user account. If you interact via a "Share" button of the respective social media provider, this information can be stored in the personal user account and possibly published. If you wish to prevent the information collected from being directly assigned to your user account, you must log out before clicking on the integrated text/image link.

7. Recipients of personal data

Within our company, only those persons have access to your personal data who need it for the purposes stated in each case. Your personal data will only be passed on to external recipients if we are legally authorised to do so or if we have your consent. Below you will find an overview of the relevant recipients:

- Processors: Group companies or external service providers, in particular the companies DAG Engineering GmbH (support with application administration), Randstad Sourceright GmbH (support with personnel recruiting and recruitment processes), MHP - Management- und IT-Beratung GmbH (support of the electronic application system) and milch & Zucker Talent Acquisition & Talent Management Company AG (Provision, operation, and support of the electronic application system.). These processors are carefully selected by us and regularly audited to ensure that your privacy is respected. The service providers may only use the data for the purposes specified by us.
- Public bodies: Authorities and state institutions, such as tax authorities, public prosecutor's offices or courts, to which we (have to) transmit personal data, e.g. to comply with legal obligations or to protect legitimate interests.
- Private entities: Group companies, Porsche dealers and service companies, cooperation partners, service providers (not bound by instructions) or commissioned persons such as Porsche Centers and Porsche Service Centers, financing banks, credit agencies or transport service providers.

8. Data processing in third countries

If data is transferred to bodies whose registered office or place of data processing is not located in the UK, we will ensure before the transfer that the data transfer is either covered by a legal authorisation, that there are guarantees for an adequate level of data protection with regard to the data transfer or you have given your consent to the data transfer.

If the data transfer takes place on the basis of Article 46, 47 or 49(1)(2) GDPR, you can obtain a copy of the guarantees for the existence of an adequate level of data protection in relation to the data transfer from us. Please use the information in section 1 for this purpose.

9. Storage period, deletion

If we are legally authorised to do so, we will only store your personal data for as long as necessary to achieve the purposes pursued or as long as you have not withdrawn your consent. In the event of an objection to processing, we will erase your personal data unless further processing is still permitted under the statutory provisions. We will also erase your personal data if we are obliged to do so for other legal reasons. Applying these general principles, we usually delete your personal data immediately

- after the legal basis no longer applies and provided that no other legal basis (e.g. retention periods under commercial and tax law) applies. If another legal basis applies, we delete the data after that other legal basis no longer applies;
- if your personal data is no longer required for the purposes pursued by us and no other legal basis (e.g. retention periods under commercial and tax law) applies. If another legal basis applies, we will delete the data once that other legal basis no longer applies.

10. Rights of data subjects

Right to information: You have the right to ask us for information about the personal data we have stored about you.

Right to rectification and erasure: You have the right to ask us to rectify incorrect data and – insofar as the legal requirements are met – erase your data.

Restriction of processing: You have the right to ask that we restrict the processing of your data, provided that the legal requirements are met.

Data portability: If you have provided us with data on the basis of a contract or consent, you have the right to ask that you receive the data you have provided in a structured, commonly used and machine-readable format or that we transfer it to another controller if the legal requirements are met.

Objection: You have the right to object to data processing by us at any time for reasons arising from your particular situation, insofar as this is based on the protection of legitimate interests. If you exercise your right to object, we will cease processing unless we can demonstrate compelling legitimate grounds for further processing which override your rights and interests.

Objection to direct marketing: If we process your personal data for the purpose of direct marketing, you have the right to object to data processing by us for this purpose at any time. If you exercise your right to object, we will stop processing your data for this purpose.

Revocation of consent: If you have given us your consent to process your personal data, you can revoke this at any time. This does not affect the lawfulness of the processing of your data prior to the revocation of your consent.

Right to lodge a complaint with the supervisory authority: You can also lodge a complaint with the competent supervisory authority if you believe that the processing of your data violates applicable law. To do so, you can contact the supervisory authority responsible for your place of residence or country or the supervisory authority responsible for us. If you are based in, or the issue relates to, the UK, the Information Commissioner's Office can be contacted as follows:

Telephone: +44 303 123 1113

Email: casework@ico.org.uk

Website: www.ico.org.uk

Web-form: www.ico.org.uk/concerns/

Address: Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

Contacting us and exercising your rights: You can also contact us free of charge if you have any questions about the processing of your personal data and your rights as a data subject. Please contact us at dataprivacy@mhp.com or by post at the address given in section 1 above. Please ensure that we are able to clearly identify you. Alternatively, if you wish to withdraw your consent, you can also use the contact method you used when giving your consent.

11. Latest version

The latest version of this privacy policy applies. Status 19.07.2024.
