



## **Privacy Policy**

### **for Personnel Marketing and the Application Procedure at the Porsche Engineering Services GmbH**

We, Porsche Engineering Services GmbH (hereinafter referred to as "we" or "PES"), appreciate your interest in our online service (hereinafter referred to as "Online Service"). We take the protection of your personal data very seriously. Your personal data will be processed exclusively in accordance with the statutory provisions of data protection law, in particular the General Data Protection Regulation (hereinafter referred to as "GDPR"). With this Privacy Policy, we inform you about the processing of your personal data and about your rights as a data subject regarding personnel marketing for job applications at Porsche Engineering Services GmbH. For information on the processing of personal data in other areas, please refer to the respective specific privacy policies.

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

#### **1. Controller and data protection officer**

Responsible for the data processing as controller in terms of data protection law is:

Porsche Engineering Services GmbH  
Etzelstraße 1  
74321 Bietigheim-Bissingen  
Deutschland  
datenschutz@porsche-engineering.de

If you have any questions or suggestions regarding data protection, please feel free to contact us. You can reach our data protection officer as follows:

Porsche Engineering Services GmbH  
Etzelstraße 1  
74321 Bietigheim-Bissingen  
Deutschland  
datenschutz@porsche-engineering.de

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 utilisation of shared databases, platforms and IT systems. We define the purposes and means of processing personal data concerning the joint processes together with the respective Group companies. In an agreement on joint controllership pursuant to Article 26 GDPR, we and the respective Group companies have determined how the respective tasks and responsibilities for the processing of personal data are structured and which company 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>.

With regard to the processing of your specific application, Porsche Engineering Services GmbH is solely responsible under data protection law.

## **2. Purpose of data protection**

The purpose of data protection is the protection of personal data.

This is all information relating to an identified or identifiable natural person (so-called data subject). This includes information such as name, postal address, email address or telephone number, but also other information that originates during the application procedure and during use of the electronic application system, such as information about your qualifications, education and work experience.

## **3. Purposes and legal bases of data processing**

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

If an employment contract is concluded with you, further data processing is conducted in accordance with the privacy policy for employees.

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 if you are required to provide personal data and the possible consequences of not providing it (e.g. a loss of claims or our notice not to provide the requested service without certain information). The use of the Online Service is generally possible without registration. The use of individual functions may require prior registration. Even if you use the Online Service without registration, personal data may still be processed.

### **3.1 Performance of a contract and pre-contractual measures**

We process your personal data if this is necessary to carry out the application process and, if applicable, to prepare 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 for the application procedure and, if applicable, to prepare an employment contract with you. The purposes include in particular:

- Recording and checking your application
- Managing the application and the selection process (forwarding to the responsible persons in-house, organizing and conducting interviews, recruitment management and administration)
- Organizing and holding selection days and tests for certain application procedures, such as the trainee program, apprenticeships, and general application days
- In the case of internal applications for in-house programs: application management and the selection process

Data is processed on the basis of Article 6 (1) (b) GDPR. We process the personal data that is required to conduct the application procedure and, if applicable, to prepare an employment contract.

If no employment contract arises, we will anonymize your data after four months, unless legal bases apply for not doing so. If the latter is the case, we anonymize the data once the other legal bases cease to apply. You can then no longer be identified. Data is processed after anonymization only for the purpose of statistical analysis.

### **3.2 Fact check**

We conduct a review of your personal information to ensure that potential employees perform their duties without conflicting interests 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), your original identity document or a comparable document proving your identity, and your certificates (in particular the last certificate of the highest

level of education) or an officially certified copy thereof in paper form. In addition, it is checked whether you already have been employed by Porsche and if so – limited to this case and in compliance with the data protection regulations – whether written disciplinary measures have been issued to you in the past three calendar years. For this purpose, personal data in the existing personal file for the past three calendar years is consulted. Your personal data will also be compared with publicly available EU sanction lists under Regulations (EC) No. 2580/2001 and 881/2002, as well as with the additions made and received by the European Commission. You will only be asked to present your original residence permit, severely disabled person's card or certificate of good conduct (reliability test) if necessary.

The fact check is carried out by the respective HR department and, if necessary, additionally by the HR Compliance & Labour Law department of Dr. Ing. h.c. F. Porsche AG. Only a limited number of internal personnel are authorised to access your data. In the case of conspicuous findings as part of the fact check, the results are discussed in a committee (specialist department, HR department, works council). The result of the consultation is documented and stored in the personnel file. For new hires under the collective agreement, the completed checklist for the fact check is retained in the personnel file and remains there in accordance with the deletion period for relevant personnel documents and data. Other data storage or processing does not take place. The checklist for the fact check is deleted from the personnel file after four months for external candidates who are not hired and after three years for all other cases.

The processing of your personal data for the purpose of establishing an employment relationship is necessary within the meaning of Art. 6 (1) (b) GDPR, as we have a legitimate interest in hiring people who have integrity and act in accordance with the applicable law. The contents of the fact check are also regulated in a collective labour agreement.

The provision of personal data is necessary for a contract.

### **3.3 Newsletter**

To subscribe to the "Job Abo" newsletter, you only need to enter your e-mail address and how often you would like to receive the newsletter. The newsletter is only sent to individuals who have subscribed, i.e. given their consent based on 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 newsletter contains information about your career opportunities at Porsche AG and at other Group companies.

Subscription is carried out using the so-called double opt-in process, i.e. after subscribing, you receive an e-mail prompting you to confirm your subscription to prevent misuse of your e-mail address. We make a record of all subscriptions so that we can provide evidence of the subscription process and associated consent in line with legal requirements. Subscriptions are always logged and the mandatory processing of data you entered during the subscription process is performed accordingly on the basis of legitimate interests according to Article 6 (1) (f) GDPR. You can withdraw your consent to receiving our "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 Job application account**

You can use the application account to send your application to us or other group companies of Porsche AG via the electronic application system, and to manage and keep an eye on job offers. We recommend that you use the job application account, as the internal processes and the application procedure itself at Porsche AG and other group companies of Porsche AG are adapted to work with this account. Even if you send us your application via another channel, your application will be scanned as part of our internal processes, and the data will be further processed electronically (see Item 3). Your paper documents will then be returned to you by post.

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

Your application account gives you the option of creating an applicant profile. You can use an online questionnaire to enter or upload your personal data (e.g., title, first name, surname, 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., cover letter, résumé, etc.), and other relevant information (e.g., desired salary, availability). Required fields in the online form are marked.

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 enable the respective application process and – if you have given your consent – as part of the review of your application within 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 to PES, the provisions in item 3 apply. With regard to the deletion of data relating to specific applications to other Group companies, the provisions in the relevant data protection notices apply (see item 1).

### **3.5 Compliance with legal obligations**

We also process your personal data to comply with legal obligations to which we are subject. These obligations may arise, for example, from commercial, tax, money laundering, financial or criminal law. Measures in the area of health management and aptitude tests may also result from legal obligations. The purposes of the processing result from the respective legal obligation; the processing usually serves the purpose of complying with state control and information obligations.

Data is processed on the basis of Article 6 (1) (c) GDPR. We process the personal data that is necessary for the compliance with the legal obligation.

We delete the data once the statutory obligation ceases to apply, unless other legal bases apply. If the latter is the case, we delete the data once the other legal bases cease to apply.

### **3.6 Safeguarding of legitimate interests**

We also process your personal data to pursue our legitimate interests or those of third parties, unless your interests, which require the protection of your personal data, outweigh these. The data processing is based on Article 6 (1) (f) GDPR. The processing to safeguard legitimate interests is carried out for the following purposes or to safeguard the following interests:

- Operational reporting
- Implementing and optimising personnel marketing and the recruitment process (performing consultations in personnel marketing, applicant surveys and statistical analyses)

When you access the Online Service, data relating to your end device and your use of the Online Service are processed and retained in a so-called log file. This concerns in particular technical data such as 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 determine and eliminate faults. In doing so, we pursue the interest of permanently ensuring technical operability. 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. The data processing is based on Article 6 (1) (a) GDPR. If you give your consent, it is always for a specific purpose; the purposes of processing are determined by the content of your declaration of consent. You can withdraw your consent at any time without affecting the lawfulness of the processing that has taken place until the withdrawal of consent.

If you have given consent for specific purposes, such as the assessment of your application in other companies of Porsche Group, for inclusion in a Talent Pool, or to receive the "Job Abo" newsletter, the purposes are determined by the content of the consent given in each case.

We use the so-called "double opt-in procedure" when sending the newsletter to prevent misuse.

We delete the data when you have withdrawn your consent, unless other legal bases apply. If the latter is the case, we delete the data once the other legal bases cease to apply.

### **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 nature of the 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 authorizations in the end device**

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

## **5. Integrated third-party services**

Insofar as we integrate services from other providers as part of our Online Service 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 data processing is then necessary to implement the functions you have selected or to protect our legitimate interest in optimising the functionality of our Online Service. Regarding third-party services, please also refer to the privacy policy of the respective provider.

Services from other providers that we include or to which we refer are provided by the relevant third parties. 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 a joint controllership agreement 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 Service 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 redirection, 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 retained in the personal user account and published if necessary. 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.

## **6. Recipients of personal data**

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

- **Processors:** Group companies or external service providers, in particular the companies EDAG 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.

## **7. Data processing in third countries**

If data is transferred to entities whose registered office or place of data processing is not located in a member state of the European Union, another signatory state to the Agreement on the European Economic Area or a state for which an adequate level of data protection has been established by a decision of the European Commission, we will ensure before the transfer that the data transfer is either protected by a legal authorisation, that there are guarantees for an adequate level of data protection with regard to the data transfer (e.g. by agreement of contractual guarantees, officially recognised regulations or binding internal data protection regulations at the data recipient) or that you have given your consent to the data transfer.

If the data transfer is based on Article 46, 47 or 49 (1) subparagraph 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 item 1 for this purpose.

## **8. Storage duration, erasure of data**

We retain your personal data, if legally permissible, only 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 legal 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 erase your personal data without undue delay

- after the legal basis has ceased to apply and provided that no other legal basis (e.g. retention periods under commercial and tax law) applies. If the latter applies, we will delete the data once the 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 the latter applies, we will delete the data once the other legal basis no longer applies;

## **9. Rights of data subjects**

**Right of access:** You have the right to receive information about the personal data we have stored about you.

**Right to rectification and erasure:** You can demand that we rectify incorrect data and, if the legal requirements are met, erase your data.

**Right to restriction of processing:** You can demand that we restrict the processing of your data, provided that the legal requirements are met.

**Right to data portability:** If you have provided us with data on the basis of a contract or consent, you may request 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.

**Right to object:** 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 our processing of your data for this purpose at any time. If you exercise your right to object, we will cease processing your data for this purpose.

**Withdrawal of consent:** If you have given us your consent to process your personal data, you can withdraw it at any time with effect for the future. The legality of the processing of your data until withdrawal remains unaffected.

**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.

**Contacting us and exercising your rights:** You can also contact us free of charge if you have questions regarding the processing of your personal data and your rights as a data subject. Please contact us at [datenschutz@porsche-engineering.de](mailto:datenschutz@porsche-engineering.de) <https://www.porsche.com/privacy-contact/> or by post to the address provided in item 1. Please ensure that we are able to clearly identify you. If you wish to withdraw your consent, you can alternatively use the contact method you used when giving your consent.

## **10. Latest version**

The latest version of this Privacy Policy applies. This version dates from 27.11.2024.