

## Privacy policy

### Porsche Engineering Romania S.R.L application process

#### **1. Introduction and General Information on Data Processing**

We, Porsche Engineering Romania S.R.L (hereinafter referred to as "We" or "PERO"), appreciate your interest in our online offering (hereinafter referred to as the "Online Offering").

This section establishes the organization's commitment to data protection and acknowledges the application of GDPR, which is essential for transparency. This aligns with GDPR Article 13, which mandates that individuals be informed about the processing of their data in a clear and transparent manner.

With this data protection declaration, we inform you about the processing of your personal data and your data protection rights in the context of personnel marketing and applications to PERO.

For information on the processing of personal data in other areas, please refer to the respective specific privacy policy.

Insofar as 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 priority information on data protection is provided in the context of such social media profiles.

#### **2. Controller and Data Protection Officer (DPO) Contact Information**

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

**Porsche Engineering Romania S.R.L**

16 Alexandru Vaida Voevod Street

4000006 Cluj-Napoca

Romania

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

[dataprotection@porsche-engineering.ro](mailto:dataprotection@porsche-engineering.ro)

The policy notes that PERO is a joint controller with other Porsche AG Group companies regarding certain shared data processing activities. This is compliant with GDPR Article 26, which requires transparency about joint controllership arrangements and the allocation of responsibilities between the parties.

#### **3. 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 (so-called data subject). This includes information such as first name and last name, hometown, street/ zip code, place of birth, date of birth, nationality, communication language, e-mail address, telephone number, LinkedIn/GitHub address, but also other information that arises during the application

process, such as information about your qualifications, education or professional background, employment history, objective/ career goal, certifications.

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

Listing the purposes and legal bases for processing data in the recruitment process is in line with GDPR Article 6. If an employment relationship is established with you, further data processing is governed by the data protection declaration 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 certain information). The use of the online offer is generally possible without registration. The use of individual services and functions may require prior re-registration. Even if you use our online services without registering, personal data may still be processed.

### **4.1 Fulfillment of Contractual and Pre-Contractual Obligations**

We process your personal data as necessary to conduct the application process and, if applicable, to prepare for a potential employment relationship with you. This data processing is performed based on Article 6(1)(b) of the GDPR, which allows processing necessary for the performance of a contract or for steps taken at your request prior to entering into a contract.

Specifically, we process personal data for the following purposes:

Recording and reviewing your application to assess your suitability for the position.

Managing your application and implementing the selection process, which includes forwarding your data to the relevant internal departments, organizing and conducting job interviews, and managing the administrative steps required to fill the position.

For internal applicants applying to internal programs: managing and implementing the selection process in alignment with internal procedures.

Under GDPR and Romanian data protection laws, all processing of personal data must be legally justified. For our processing activities, we generally rely on the following legal bases:

**Contractual Justification:** Processing is necessary for the performance of the employment contract or to take steps, at your request, prior to entering into a contract, as outlined in Article 6(1)(b) GDPR and corresponding Romanian data protection laws specific to employment.

**Legal Obligation Justification:** Processing is necessary for compliance with a legal obligation to which we are subject, as per Article 6(1)(c) GDPR. This may include complying with Romanian labor laws, tax obligations, or other regulatory requirements.

Legitimate Interest Justification: Processing is necessary to pursue our legitimate interests, provided that these interests are not overridden by your rights and freedoms. This may include activities related to operational efficiency, ensuring fair and efficient recruitment processes, and preventing conflicts of interest, in compliance with Article 6(1)(f) GDPR.

If you provide us with special categories of personal data (e.g., health information such as disability status) as defined in Article 9(1) GDPR, we will process this data only when strictly necessary and in compliance with Article 9(2)(b) GDPR, as well as relevant provisions of Romanian labor and data protection laws. Specifically, processing of health data may be necessary for fulfilling obligations in the field of employment, social security, or social protection law, or for assessing your ability to perform work-related tasks, subject to Section 26(3) sentence 1 GDPR.

## Retention and Anonymization of Data

If an employment relationship is not established, we will retain your personal data only for as long as necessary to fulfill the purposes for which it was collected. Unless another legal basis requires extended retention, your data will be anonymized **four months** after the conclusion of the application process. Once anonymized, it will no longer be possible to identify you personally. This anonymized data may be used solely for statistical and analytical purposes to improve our recruitment processes.

## **4.2 Fact Check**

We conduct a fact check on your personal data to ensure that potential employees can perform their roles without conflicts of interest, maintain high ethical standards, and uphold the company's principles.

Equity and inclusiveness are core values of our organization. We believe that every candidate should have an equal opportunity to succeed, and we aim to foster a diverse, equitable, and inclusive environment. To support these values, we may monitor anonymized and aggregated data related to candidates to make informed, inclusive hiring decisions. Please note that this data will never be used to identify you individually or to make decisions about you personally. This information is not visible to anyone involved in the recruitment process for any specific role.

## Verification of Personal Data

To conduct the check, we may need to verify specific personal data such as your full name, date of birth, and address. We may ask you to present original identity documents (e.g., identity card, passport) and educational certificates (particularly the highest level of education attained) or officially certified copies. Additionally, we may check whether you have previously been employed by PERO and, if so, review any written disciplinary records from the past three calendar years, as permitted under GDPR and Romanian labor and privacy regulations.

Furthermore, we may perform a comparison with publicly accessible EU sanctions lists as required under EU regulations, specifically Regulations (EC) No. 2580/2001 and 881/2002, as amended. Please note that any such checks are conducted solely to ensure compliance with applicable laws.

In certain cases, you may be asked to provide specific documents, such as a residence permit, disabled person's pass, or certificate of good conduct, if necessary for your role or required by law.

## Process and Access Authorization

The fact check is conducted by authorized personnel within the HR department and, if necessary, the Legal & Compliance department of PERO. Access to your personal data is restricted to a limited group of employees with appropriate internal authorization. In the event that any concerning findings arise during the fact check, the results are reviewed by a committee (including relevant departments and, where appropriate, a works council representative). The outcome of this review is documented and may be stored in your personnel file.

## Data Storage and Retention Period

For new hires in senior roles (e.g., Director, Senior Sales Director, Associated Partner, Executive Director, Partner), the completed fact check checklist and self-disclosure form will be stored in the personnel file. These documents will be retained in accordance with the applicable retention period for personnel records. For candidates who are not hired, the checklist and self-disclosure form will be deleted after **four months**. For other cases, these documents will be retained for a **maximum of three years** unless otherwise legally required.

The processing of your personal data for the purpose of establishing an employment relationship is necessary for pre-contractual and contractual purposes, in compliance with Article 6(1)(b) of the GDPR. Furthermore, we have a legitimate interest in recruiting individuals who demonstrate integrity and comply with relevant legal standards, in line with Article 6(1)(f) GDPR.

This process is also governed by internal agreements that regulate the fact-checking process to ensure compliance with GDPR and Romanian labor laws. Please note that providing this data is necessary for the completion of the recruitment process and potential employment.

## 4.3 Job Subscription

To subscribe to the "Job Abo" newsletter, you only need to provide your email address and indicate your preferred frequency for receiving the newsletter. We will send newsletters to you only after you have provided explicit consent, in accordance with Article 6(1)(a) GDPR.

The "Job Abo" newsletter provides information about career opportunities within PERO and other Porsche Group companies. If you specify particular areas of interest during registration, these preferences will determine the content of the newsletters you receive.

## Double Opt-In Registration

Your registration is completed through a double opt-in procedure. After you sign up, you will receive a confirmation email with a link to verify your subscription. This step is required to prevent unauthorized use of your email address. We logged onto each registration to comply with legal requirements and document the consent process, as required by GDPR.

## Legal Basis for Processing

The logging of your registration and processing of data during registration are conducted based on our legitimate interest in ensuring a secure and transparent registration process, in accordance with Article 6(1)(f) GDPR.

## Right to Withdraw Consent

You have the right to withdraw your consent to receive the "Job Abo" newsletter at any time. To unsubscribe, simply click on the unsubscribe link included at the bottom of each newsletter. Upon unsubscribing, we will cease sending the newsletter to you, and your email address will be removed from our distribution list.

## **4.3 Application account**

The application account allows you to submit and manage your application with us or other Group companies via our electronic application system, as well as to monitor job opportunities. We recommend setting up an application account, as it facilitates a coordinated and efficient application process across PERO and other Group companies. Even if you apply through other means, we will scan your application documents as part of our internal process, and the data will be processed electronically (see Section 3). Any paper documents you provide will be returned to you by post.

To create an application account, registration is required. During registration, we will collect and process your login details (username and password) to secure and manage your account.

As part of the application account, you may also set up a detailed applicant profile. The online questionnaire allows you to enter or upload personal information (such as your form of address, title, first and last names, date and place of birth, nationality, address, phone number, and email), your qualifications (including educational background, professional experience, language skills, and IT skills), and application documents (such as cover letters, CVs, and other application-related information, including desired salary and availability if applicable). Mandatory fields are clearly marked in the online questionnaire.

## Legal Basis for Processing

Your personal data within the application account is processed based on Article 6(1)(b) GDPR, as it is necessary to create your account, establish your applicant profile, and facilitate the application process. Where you have provided additional

consent (e.g., for application review within the Porsche Group or inclusion in the Talent Pool), processing is based on your consent under Article 6(1)(a) GDPR.

## Data Retention and Deletion

If you choose to delete your application account, all data associated with your user profile will also be deleted. The specific retention and deletion policies for application data processed by PERO are detailed in Section 3. If your data has been shared with other Group companies, the relevant data protection policies of those companies will apply (see Section 1).

## **4.4 Compliance with Legal Obligations**

We process your personal data as necessary to fulfill legal obligations to which we are subject. These obligations may stem from commercial, tax, anti-money laundering, or financial legislation, as well as other regulatory requirements. For example, health management measures or aptitude tests may be required by law.

The specific purposes for this processing arise from each applicable legal requirement, and generally aim to meet regulatory control and reporting obligations imposed by state authorities.

## Legal Basis for Processing

Processing to comply with legal obligations is carried out based on Article 6(1)(c) GDPR, which allows processing necessary to fulfill legal obligations. In this context, we will only process the personal data strictly required to meet these obligations.

## Data Retention and Deletion

We will retain this data only as long as necessary to fulfill the legal obligation. Once legal obligation no longer applies and no other legal basis exists, we will delete the data. If another legal basis for retention applies (e.g., defense against potential legal claims), we will retain the data only as long as necessary for that purpose, after which it will be securely deleted.

## **4.5 Safeguarding Legitimate Interests**

We may process your personal data to protect our legitimate interests or those of third parties, provided that your rights and interests do not override these interests.

## Legal Basis for Processing

This processing is based on Article 6(1)(f) GDPR, which allows for processing necessary for legitimate interests. Our legitimate interests include:

Operational reporting to improve internal processes.

The implementation and optimization of personnel marketing and recruitment, such as consulting, applicant surveys, and statistical evaluations to improve recruitment processes.

## Technical Data Collection for Online Services

When you access our online services, we collect data related to your device and usage of the service, which is stored in log files. This includes technical data, such as the date and time of access, duration of the visit, device type, operating system, features used, data volume transmitted, IP address, and referrer URL.

This data is processed to ensure the proper technical functioning of our online services, identify and resolve technical issues, and improve our services over time. We pursue the long-term interest of ensuring technical stability and reliability. Please note that we do not use this data to draw conclusions about your identity.

## Data Retention and Deletion

Technical data is stored only as long as necessary to achieve these purposes, after which it is deleted or anonymized, depending on the applicable retention periods and our data retention policies.

## **4.6 Consent**

We process your personal data based on your explicit consent when required. Data processing under consent is carried out in accordance with Article 6(1)(a) GDPR. Each instance of consent is obtained for a specific purpose, as outlined in your consent declaration. You may withdraw your consent at any time, which will not affect the lawfulness of processing conducted based on consent prior to withdrawal.

## Examples of Consent-Based Processing

If you have provided consent for specific purposes, such as for application review by other Group companies, inclusion in a talent pool, or to receive the "Job Abo" newsletter, processing will be limited to these purposes as described.

## Double Opt-In for Newsletters

We use a double opt-in procedure for newsletter subscriptions to verify your consent and prevent misuse of your email address. After registering, you will receive a confirmation email asking you to validate your subscription. The registration

process, including logging of consent, is based on our legitimate interests in accordance with Article 6(1)(f) GDPR to ensure a secure and verifiable consent process.

## **Right to Withdraw Consent**

You may withdraw your consent at any time by unsubscribing through the link provided at the end of each newsletter or by contacting us directly. Upon withdrawal of consent, we will immediately cease the relevant data processing and delete your data unless another legal basis applies. If another legal basis applies, we will retain the data only as long as necessary on that basis, after which it will be deleted.

## **4.7 Change of purpose**

If we need to process your personal data for a purpose different from the one for which it was initially collected, we will evaluate the compatibility of the original purpose with the new purpose. In doing so, we will consider factors such as the nature of the personal data, the context in which it was collected, the potential impact of further processing on you, and the safeguards implemented to protect your data, in accordance with Article 6(4) GDPR. If the new purpose is not compatible with the original purpose, we will inform you in advance and, if required, obtain your consent.

## **4.8 Profiling and Automated Decision-Making**

We do not engage in automated decision-making, including profiling, which produces legal effects concerning you or similarly significantly affects you, as defined in Article 22 GDPR.

If any profiling is performed, it is strictly limited to protecting our legitimate interests, such as improving recruitment efficiency or understanding applicant trends, without any legal or significant effect on individual applicants. Any profiling conducted for these purposes is performed in compliance with GDPR Article 6(1)(f) and is subject to strict data protection measures.

## **5. Access Permissions on Your Device**

Some features of our online services may require access permissions on your device (e.g., location data). Granting these permissions is entirely voluntary; however, without them, certain functionalities may not be available.

Once permissions are granted, they remain active until you change your device settings to deactivate them. You can manage these permissions in your device settings at any time.

## **6. Cookies and Similar Technologies**

Cookies are small text files stored on your device to collect standard internet log information and visitor behavior data. Our online services use cookies and similar technologies to interact with your device and exchange stored information.

**Technically Necessary Cookies:** These cookies are essential to make certain functionalities of our online services available. Examples include storing language preferences, login data, or items in a shopping or watch list. These cookies enable the processing described in Section 3.1 and support the secure and proper operation of our online services. Data processing for these cookies is based on Article 6(1)(b) and (f) GDPR, as it is necessary to provide the services you selected and to safeguard our legitimate interest in ensuring website functionality.

**Analytics and Marketing Cookies:** If we use cookies to analyze usage of our online services, tailor content to your interests, or deliver personalized advertisements, this is done only with your explicit consent, in accordance with Article 6(1)(a) GDPR. You can control these cookie preferences via our consent management tool within the online service. You may withdraw your consent at any time with future effect.

For detailed information on the specific types and functions of cookies, as well as how to manage or withdraw your consent, please refer to our consent management area. Please note that if you block or restrict certain types of cookies, the functionality of our online services may be impaired.

**Managing Cookies:** If you prefer not to use cookies, you can adjust your device settings to block cookies or delete stored cookies. However, please note that blocking certain cookies may limit your use of some functionalities on our online services.

## **7. Integrated Third-Party Services**

Our online services may integrate content or functionalities provided by third-party service providers (e.g., video players or route planning tools). In cases where personal data is processed to provide these services, processing is based on Article 6(1)(b) and (f) GDPR, as it is necessary to provide the selected features or support our legitimate interest in offering a diverse range of functionalities.

**Cookies for Third-Party Services:** If cookies are required for third-party services, the rules described in Section 5 on cookies apply. Please also refer to the privacy policy of each respective provider to understand how your data is processed in connection with third-party services.

**Third-Party Services and Social Media Links:** Certain third-party services may include offerings from other Porsche AG Group companies or Porsche Centers. In general, we do not have control over the content or functionality of third-party services and are not responsible for data processing carried out by these providers unless the service is provided entirely on our behalf and under our responsibility.

In cases where we jointly control processing with a third-party provider (e.g., for integrated services), we have entered into an agreement on joint controllership in compliance with Article 26 GDPR. This agreement defines each party's responsibilities for data protection obligations. You will be informed about who is responsible for cookies or other third-party services that require your consent within our consent management tool.

**Social Media Integration:** Our online services may include links to social media platforms. Clicking on these links will redirect you to the respective social media provider, who may then collect personal data directly. If you are logged into your account on that social media platform at the time, the provider may link your visit to your user account.

For instance, if you use a "Share" button, this action may be associated with your social media profile and made publicly visible depending on your privacy settings on that platform. To avoid such associations, please log out of your social media accounts before interacting with these links. For further information on how these providers handle your data, please consult the privacy policy of the relevant social media platform.

## **8. Recipients of personal data**

Within our organization, access to your personal data is strictly limited to personnel who require it to fulfill the specified processing purposes. We only share your personal data with external recipients if we have a legal basis to do so, such as a contractual obligation, legal authorization, or your explicit consent.

The relevant categories of external recipients are outlined below:

**Processors:** We may share your data with group companies or external service providers, such as milch & zucker Talent Acquisition & Talent Management Company AG, which provides, operates, and supports our electronic application system. These processors are carefully selected, bound by data protection agreements, and regularly monitored by us to ensure the protection of your data in accordance with GDPR. Processors may only use the data as instructed by us and solely for the specified purposes.

**Public Authorities:** We may disclose your data to government bodies and institutions, such as tax authorities, public prosecutors, or courts, if required to fulfill our legal obligations or protect our legitimate interests. This may include providing data to comply with tax, regulatory, or law enforcement requirements.

**Private Entities:** In certain circumstances, we may share your data with private entities, including other group companies, Porsche dealers, service companies, cooperation partners, authorized agents (such as Porsche Centers and Porsche Service Centers), financing banks, credit agencies, or transport service providers. In such cases, data sharing is done in compliance with GDPR and Romanian data protection laws, and only when necessary for the intended purposes.

We ensure that any recipient of your personal data processes it in compliance with applicable data protection regulations, including implementing appropriate technical and organizational measures to protect your privacy.

## **9. Data Processing in Third Countries**

If we transfer personal data to entities located outside the European Union (EU) or the European Economic Area (EEA), or to a country not recognized by the European Commission as having an adequate level of data protection, we will ensure that appropriate safeguards are in place in accordance with GDPR and Romanian data protection laws.

Such safeguards may include:

**Standard Contractual Clauses (SCCs):** We may enter into data protection agreements incorporating SCCs, as approved by the European Commission, to provide adequate protection for your personal data.

**Binding Corporate Rules (BCRs):** For transfers within the Porsche Group or affiliated companies, we may rely on BCRs that have been approved by the relevant supervisory authorities to ensure data protection standards are upheld.

**Consent:** In cases where other safeguards are not available, we may request your explicit consent for the transfer of data to a third country, ensuring you are informed of any potential risks involved.

In certain situations, data transfers may also be permitted based on exemptions provided under GDPR Articles 46, 47, or 49(1)(2). You may request a copy of the applicable safeguards and guarantees in place for data transfers outside the EU/EEA by contacting us using the details provided in Section 1.

## **10. Storage Period and Data Deletion**

We retain your personal data only for as long as it is necessary to fulfill the purposes for which it was collected or as required to comply with legal obligations, unless you have withdrawn your consent and there is no other legal basis for processing.

If you object to processing, we will delete your personal data unless we are legally permitted to continue processing it for specific reasons (e.g., for legal defense purposes). We will also delete your personal data if required to do so by law or if it is no longer needed for the intended purposes and there is no other legal basis for retention.

In line with these principles, we generally delete your personal data under the following conditions:

**Upon the Expiration of the Legal Basis:** Once the legal basis for processing ceases to apply and no other legal basis (e.g., statutory retention periods under commercial or tax law) applies, we will delete your data. If additional legal grounds exist, we will delete the data as soon as they no longer apply.

**Data No Longer Needed for Processing Purposes:** If your personal data is no longer required for the purposes for which it was collected and no other legal basis (e.g., statutory retention requirements) applies, we will delete it promptly. In cases where retention periods under commercial or tax law require extended storage, data will be deleted as soon as these retention periods expire.

We apply strict internal guidelines to ensure data is deleted or anonymized in compliance with GDPR and Romanian data protection laws.

## **11. Your Rights as a Data Subject**

In accordance with applicable data protection laws, including the GDPR and Romanian data privacy laws, you have various rights concerning the processing of your personal data. Each of these rights may be exercised in line with the specific conditions defined in the relevant laws:

**Right of Access:** You have the right to request information regarding the personal data we hold about you, including details on how your data is processed, the purposes of processing, and the categories of data involved.

**Right to Rectification and Erasure:** You may request the correction of inaccurate or incomplete personal data. Additionally, you have the right to request the deletion of your data where legal requirements are met, for example, if the data is no longer necessary for the purposes for which it was collected, or if you have withdrawn your consent and there is no other legal basis for processing.

**Right to Restriction of Processing:** You may request the restriction of processing of your personal data under certain circumstances, such as if you contest the accuracy of the data or object to the processing based on legitimate interests. While processing is restricted, we may only store your data and will not process it further unless permitted by law.

**Right to Data Portability:** If your personal data is processed based on your consent or a contract, you have the right to request that we provide the data you submitted to us in a structured, commonly used, and machine-readable format. You may also request, where technically feasible, that we transmit this data directly to another data controller.

**Right to Object:** You have the right to object to the processing of your personal data at any time on grounds relating to your particular situation, provided the processing is based on our legitimate interests (Article 6(1)(f) GDPR). If you object, we will stop processing your data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or if the processing is necessary for the establishment, exercise, or defense of legal claims.

**Right to Object to Direct Marketing:** If we process your personal data for direct marketing purposes, you have the right to object at any time to such processing. If you exercise this right, we will immediately cease processing your data for direct marketing purposes.

**Right to Withdraw Consent:** If you have provided consent for specific processing activities, you have the right to withdraw this consent at any time, with future effect. This does not affect the lawfulness of processing conducted based on consent before its withdrawal.

**Right to Lodge a Complaint with the Supervisory Authority:** If you believe that the processing of your personal data violates applicable data protection laws, you have the right to lodge a complaint with the supervisory authority. You may contact the supervisory authority for your place of residence or the authority responsible for our organization. In Romania, the relevant authority is the **National Supervisory Authority for Personal Data Processing (ANSPDCP)**.

## **Contacting Us and Exercising Your Rights**

If you have any questions regarding the processing of your personal data or wish to exercise your rights, you may contact us free of charge at any time. Please reach out to us at:

# Porsche Engineering

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**Email: [dataprotection@porsche-engineering.ro](mailto:dataprotection@porsche-engineering.ro)**

To ensure that we can process your request effectively, please provide sufficient information to verify your identity. If you wish to withdraw consent, you may also use the same method that you used to grant consent.

## **12. Policy Status**

This privacy policy reflects the most recent version as of November 6, 2024. Please note that it may be updated periodically to ensure continued compliance with applicable data protection laws and reflect changes in our data processing practices.