

Data protection information for applicants (m/f/d)

Version 4 dated May 22nd, 2024

Hello,

At the dormakaba Group we take the protection of your personal data very seriously and will always process your personal data in compliance with the legal data protection regulations. In the following, terms such as "applicant", "employee", etc. will be used in a gender-neutral manner.

Regardless of whether you are an applicant or an employee, we want to provide you with an overview of how we process your personal data and information regarding what your rights are according to provisions of article 13, 14 and 21 of European General Data Protection Regulation (GDPR). The term "employee" also includes interns, diploma students, student trainees, seasonal workers, and temporary employees.

A. Responsible authority and data protection officer

a. Responsible for the processing of your personal data is the

dormakaba International Holding GmbH
DORMA Platz 1
58256 Ennepetal
Germany
Phone: +49 2333 793 0
Mail: info.de@dormakaba.com

b. You can reach out Data Protection Officer via

dormakaba International Holding GmbH
attn. Data Protection Officer
DORMA Platz 1
58256 Ennepetal
Germany
Mail: data.protection@dormakaba.com

The responsibility for the data processing of your personal data changes, depending on a possible employment with a dormakaba company other than above. Detailed information can be found in annex "Responsible persons and data protection officers". Please find the responsible Data Protection Officer in annex "Responsible persons and data protection officers" as well.

B. How do we collect your personal data?

We collect your data as part of an application process in several ways:

- **Online application** via our applicant tracking systems in which we may gather
 - o Your private contact details e.g. name, phone number, address, email address,

- Employment records in the form of a resumé and cover letter, or by the means of entering your experiences and skills in the system manually
 - Qualifications either by entering them in the system or uploading certificates, diploma, etc.
 - Further documents may be requested during the recruitment process if necessary for the role (e.g. driving license, etc.)
- **Recruitment Agency:** If we mandate a third-party recruitment agency, your application data will be transmitted by them to us
 - **Paper or email application:** if you choose to send us your details via email or in paper

Visibility of your data within the organization

When applying online, you have the possibility to make your data available:

1. "to also consider me for other open positions (I consent that my personal data may be processed for this purpose as described in more details in the Data Privacy Statement)." In this case all permitted Recruiters within dormakaba group worldwide may find your data while performing a search. In this case you will be notified of a suitable opening and asked to apply if interested.
2. "to only consider me only for positions to which I have applied for." In this case, your data will only be visible and findable for the Recruiter in charge of managing the recruitment for the role you applied for.

Please note that your data will be placed in a talent pool with the visibility access as you have defined for a duration according to our retention periods listed in the annex C at the end of this document. You can naturally delete your profile or revoke your consent at any time in your account or sending us an e-mail.

C. Purpose and legal basis of data processing

We process your personal data in accordance with EU-GDPR and for the purpose of establishing, your employment relationship according to Art. 88 EU-GDPR in conjunction with Art. 26 BDSG-Neu (New German Federal Data Protection Law as well as eventually Art. 6 (1) EU-GDPR.

1. Performance of contractual measures (Art. 6 (1) (b) GDPR)

Processing of data is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract.

2. Compliance with a legal obligation (Art. 6 (1) (c) GDPR)

Furthermore, personal data can be processed if processing is necessary for compliance with a legal obligation or defense and assertion of legal claims from the responsibility relationship. Legal basis is here Art. 6 (1) (f) EU-GDPR. Justified interest for example could be burden of proof in legal proceedings according to the local equal opportunity laws in place.

3. Consent (Art. 6 (1) (a) GDPR)

If you give your consent to processing your personal data for designated purposes, the legality of such processing is given according to Art. 6 (1) (a) EU-GDPR. Given consent can be revoked with future effect any time (see chapter one of this data protection information).

4. Establishing, fulfilling the contract

Initially, the purpose of processing the data is to select suitable candidates. As early as the contract initiation stage, we are legally obliged to subject your data to an "anti-terror screening" in some countries.

Depending on your individual role, it is possible that a reliability or security check of your background is required before we can assign you to certain customers or areas (e.g. aviation security).

If necessary for the safety of the role a medical check may be organized and required as legally permitted in the country of employment.

5. For the investigation of criminal offences

We reserve the right to process personal data of employees for the purpose of investigating criminal offences in accordance with local laws. This requires clear, documentable indications to support the suspicion that the person concerned has committed a criminal offence within the scope of their employment relationship and that the processing of this data is necessary for the investigation and has undergone a balancing of interests.

D. Recipients of personal data

Within our company, your data can be accessed by those individuals or offices who require them to perform their respective role in the company, or to fulfill our contractual or legal obligations.

- The works council or alternatively the representative body for executive staff, eventually the representative for severely disabled people will receive any necessary data within the scope of its legal duties and rights according to local laws like for instance the to the Works Constitution Act in Germany.
- Your personal data can be passed to companies associated with the dormakaba Group as far as this is in accordance with the purposes and legal bases stated in chapter C of this data protection information.
- In case of travel reimbursement, data will be passed to the relevant internal or external accounting services.
- Human Resources administration to proceed with organizing a contract and the further administrative paperwork.
- Hiring department and interviewers within dormakaba group who are assigned to take part to the assessments for the applied role.
- Under certain conditions, personal data may also be transferred to public institutions (e.g. tax authorities, job centers, integration offices), social insurance agencies, judicial and law enforcement authorities (e.g. police, prosecution offices, courts), lawyers and notaries, as well as accountants.
- Internal Audit will receive the data for examination purposes.

Specifically, the following recipients may receive your personal data:

- Trade associations;
- Financial authorities;

- Social insurance agencies, e.g. health insurance providers, pension insurance companies, etc.;
- Aviation security authority;
- Integration office;
- Insurance companies;
- Accountants;
- ISO auditors;
- Authorities (within the scope of assignments);
- Chamber of industry and commerce, universities, training workshop (in the case of apprentices);
- Centre for Occupational Healthcare and Work Safety (ZAA);
- Leasing companies

E. Transfers to third countries or international organizations

Your data is stored within the EU according to GDPR protection standards and made available to recipients in the country of your application. If your personal data is transmitted to third countries outside the European Economic Area, which might not provide an appropriate data protection level, we will take all necessary measures for such data transmissions according to EU-GDPR. We use adequate technical and organizational measures (TOMs) to protect your personal data from unauthorized access or usage as well as unintentional, accidental loss or destruction.

F. Duration of storage

We will always delete your personal data, once the purpose of processing has expired, all mutual obligations have been fulfilled and no other legal obligations or justifications for the storage of your data exist to the contrary.

Data are stored according to the principle of storage limitation. This means that data are only stored for as long as it is necessary for the respective purpose. Legal deletion and retention periods are also taken into account in accordance with the country regulations. Please refer to annex C for the country specific retention periods.

G. Your data protection rights

You have the following rights to data protection in accordance with the legal provisions:

1. the right to information about the personal data stored by the respective dormakaba entity (article 15 EU-GDPR) as well as
2. the right to rectification of your data (article 16 EU-GDPR),
3. the right to deletion of your data (article 17 EU-GDPR),
4. the right to restrict the processing of your data (article 18 EU-GDPR),
5. the right to the portability of your data (article 20 EU-GDPR),
6. and the right to object (article 21 EU-GDPR)

In addition, you have the right to address an inquiry or complaint to the responsible supervisory authority.

For North Rhine-Westphalia, for example, this would be the responsibility of the Representative for Data Protection and Freedom of Information for North Rhine-Westphalia (LDI NRW) (<https://www.lidi.nrw.de>).

H. Am I required to provide you with my personal data?

As part of the employment relationship, you must provide the personal data that is required for the initiation, fulfillment and termination of the employment relationship and for the fulfillment of the associated contractual obligations, or that we are legally obliged to process. Without this data, we are generally unable to enter into or fulfill an employment contract with you.

In our contract forms and on our website, it is clearly marked which information is voluntary and which is compulsory.

I. Right of objection

1. The right of objection in individual cases

You have the right to object to the processing of your personal data at any time, for reasons arising from your particular personal situation, if processing takes place on the legal basis outlined in article 6 para. 1 point e EU-GDPR (processing in the public interest) and art. 6 para. 1 point f EU-GDPR (data processing for the purpose of balancing of interests). This also applies to profiling that is supported by this condition.

If you file an objection, we will refrain from processing your personal data, unless we can demonstrate mandatory, legitimate reasons for processing such data that outweigh your interests, rights and freedoms, or serve the purpose of enforcing, exercising or defending legal claims.

2. Recipient of your objection

You can send your objection in any format with the subject line "Objection", stating your name, address and date of birth, to us (see annex).

You also have the possibility in your candidate account to revoke the data privacy statement consent at any time which will result in deleting the information gathered with immediate effect.

J. Video conferences, online meetings, webinars and screen sharing

We use platforms and applications of other providers (hereinafter referred to as "Third-Party Providers") for the purpose of conducting video and audio conferences, webinars and other types of video and audio meetings. When selecting third-party providers and their services, we comply with any associated legal requirements. See annex B for an overview of used providers.

In this context, any communications facilitated on the platform of a third-party provider will have participant data processed by and stored on the servers of those third-party providers.

This data can in particular include registration and contact data, visual and vocal contributions, as well as entries in chats and shared screen contents.

If dormakaba invites a user to use a third-party provider, utilizing that platform or software to facilitate business operations, communication, or other forms of a relationship between the user and dormakaba, that third-party provider will have the ability to process the data and metadata used in that exchange for security, service optimization, or marketing purposes. We therefore ask that users review the data protection information of the third-party providers being utilized.

Notes on the legal basis: If we ask users for their consent to use the third-party providers or certain functions (e.g. consent to a recording of conversations), the legal basis for processing is the consent. Furthermore, their use can be a component of our (pre)contractual services, insofar as the use of third-party providers has been agreed in this context. Otherwise, user data is processed on the basis of our legitimate interest in efficient and secure communication with our communication partners. In this context, users may refer to the following information on the use of cookies in this privacy policy.

- **Processed Types of Data:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text entries, photographs, videos), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Persons concerned:** communication partners, users (e.g. website visitors, users of online services).
- **Purposes of processing:** contractual services and support, contact requests and communication, office and organizational procedures.
- **Legal bases:** Consent (Art. 6 para. 1 sentence 1 lit. a GDPR), contract performance and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b. GDPR), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. GDPR)

The above written data privacy statement is valid for all dormakaba group's legal entities and is based on your country of residence.

Should you choose to apply in another country, some additional information or differences may apply. you can find in annex D a link to additional and specific local country data protection information.

Thank you for taking the time to read our data protection information for applicants.

Annex:

Annex A: Responsible persons and data protection officers

A1. General data protection Officer

For any inquiries in local countries, the coordination and dispatch will be done by our Global Data Protection Officer and can be contacted here:

dormakaba International Holding GmbH

attn. Data Protection Officer

DORMA Platz 1

58256 Ennepetal
Germany
Mail: data.protection@dormakaba.com

A2. In these legal entities, the direct contact is:

Austria

dormakaba Austria GmbH
Urbanek Lind Schmied Reisch Rechtsanwälte OG
Domgasse 2
3100 St. Pölten
dsgvo.at@dormakaba.com

Bulgaria

dormakaba Bulgaria EOOD
r.d. Druzhiba 2, Heidelberg 15 Str.
Sofia, 1582
personaldata.BG@dormakaba.com

dormakaba business services Bulgaria EOOD
bul. Tsarigradsko shose 90, Capital fort, vh B, et 5,
Sofia, 1582
personaldata.BG@dormakaba.com

France

dormakaba France
attn. Délégué à la Protection des Données
3 rue Descartes
78320 Le Mesnil Saint-Denis
data.protection.fr@dormakaba.com

Germany

DORMA-Glas GmbH
attn. Data Protection Officer
Max-Planck-Str. 33-45
32107 Bad Salzuflen
claus.frohwitter@dormakaba.com

DORMA Hüppe Raumtrennsysteme GmbH + Co. KG
Industriestraße 5
26655 Westerstede / Ocholt
Externer Datenschutzbeauftragter:
MERENTIS DataSec GmbH
Fachbereich Datenschutz
Rechtsanwalt Tobias K. Eicke
Kurfürstenallee 130
28211 Bremen
teicke@merentis.com

Japan**dormakaba Japan co.,ltd**

Address: 2F Omori Prime Building 6-21-12 Minamioi, Shinagawa-ku
140-0013 Tokyo, Japan

Hr.jp@dormakaba.com

Norway**dormakaba Norge AS**

Graterudveien 16
3036 Drammen

anders.birkeland@dormakaba.com

The Netherlands**dormakaba Nederland B.V.**

Dalwagen 45
6669 CB Dodewaard
Nederland

info.nl@dormakaba.com

Spain**dormakaba España S.A.U**

Maria Tubau, 4
28050 Madrid
protecciondedatos@dormakaba.com

Sweden**dormakaba Sverige AB**

FO Petersons gata 28
421 31 Vastra Frolanda

anders.birkeland@dormakaba.com

Annex B: Used services and service providers**Microsoft Teams and Skype:**

Messenger and conferencing software; service providers: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA;

Website Skype:<https://www.skype.com/de/>;

Website Teams:<https://www.microsoft.com/de-de/microsoft-365/microsoft-teams/group-chat-software/>

Privacy policy:[https://privacy.microsoft.com/de-](https://privacy.microsoft.com/de-de/privacystatement)

[de/privacystatement](https://privacy.microsoft.com/de-de/privacystatement), safety instructions:<https://www.microsoft.com/de-de/trustcenter>.

Annex C: Data retention periods

Country	Candidate Profile	Job Application
Austria	6 Months	6 Months
Australia	6 Months	6 Months
Belgium	2 years	3 months
Brazil	6 Months	6 Months
Bulgaria	6 Months	6 Months
Canada	3 Years	3 Years
Czech Republic	6 Months	6 Months
China Hong Kong Taiwan	6 Months	6 Months
Croatia	6 Months	6 Months
Denmark	12 Months	12 Months
Finland	12 Months	12 Months
France	2 Years	2 Years
Germany	6 Months	6 Months
Hungary	6 Months	6 Months
India	6 Months	6 Months
Indonesia	6 Months	6 Months
Italy	6 Months	6 Months
Japan	6 Months	6 Months
Kuwait	5 Years	5 Years
Luxembourg	2 years	6 months
Malaysia	2 Years	2 Years
Mexico	6 Months	6 Months
Morocco	6 Months	6 Months
(the) Netherlands	1 year	1 month
New Zealand	6 Months	6 Months
Norway	12 Months	12 Months
Philippines	6 Months	6 Months
Poland	3 years	3 years
Portugal	6 Months	6 Months
Qatar	5 Years	5 Years
Romania	6 Months	6 Months
Russian Federation	6 Months	6 Months
Saudi Arabia	5 Years	5 Years
Serbia	6 Months	6 Months
Singapore	2 Years	2 Years
Slovakia	6 Months	6 Months
Spain	12 Months	12 Months
Switzerland	2 Years	2 Years
Sweden	12 Months	12 Months

Thailand	6 Months	6 Months
Turkey	6 Months	6 Months
UAE	5 Years	5 Years
USA	4 Years	4 Years
Remaining Countries	6 Months	6 Months

Annex D: Links to all local country Data protection information for applicants

[Austria - Anhang zur Datenschutzrichtlinie](#)

[Brazil & Mexico – Data Protection information LatAm](#)

[France – Data Privacy appendix](#)

[Ireland - Data Privacy Statement IE](#)

[United Kingdom – Data Protection information AE UK](#)