**PEC Group’s Privacy Notice**

**for the recruitment process**

1. **Preamble**

In this privacy notice, we inform you how your personal data is processed in the applicant management process at PEC Group. Additionally, we inform you about your rights under applicable data privacy laws. Personal data is all data that refers to an identified or identifiable natural person, such as date of birth, address or invoice data, and data that is specific to their identity.

The personal data you have provided during your application, under any form, will be entered in our applicant management system and processed by the relevant legal entities of the PEC Group for the purpose of processing your application and with the objective of filling vacant job positions in one of the companies at PEC Group.

The process of filling vacancies involves several members of our HR departments, together with the respective managers and if also required the members of the respective department responsible for the recruitment process. As these people may belong to different companies of PEC Group, your data may be exchanged within the PEC Group across different countries.

Protecting your personal data and ensuring the security of all our business data are important concerns for us. The personal data collected when you apply online is treated confidentially and strictly in accordance with the statutory provisions.

1. **Contact details of the data controller and data privacy officer**

The PEC Group legal entity to which you submit your application is responsible for processing your data. You will find the contact details of the PEC legal entities in *Annex 1*.

Below are the details of the Data Controller and the Data Privacy Officer of the Group:

PEC N.V.

Technologielaan 12.

3001 Leuven,

Belgium

+32 16 39 83 39

To assert your rights please contact us by email: pec.data.privacy at peccorp . com

To notify data protection incidents please use also the above email contact.

1. **Job applications for vacancies on our portal**

There are various ways to apply for a job at PEC – e.g. such as direct application for a vacancy advertised on our portal, application via email or through job advertising websites (including LinkedIn) or even in person on a JobFair event. Your application will be assessed as per our internal processes. Applications reaching us through the channels listed above other than direct application on our portal gets entered in our applicant management system manually.

We keep you up to date on the status of your application by email. You are free to edit your data or withdraw your application and request removal of your data shared with us at any time during the application process.

1. **Data categories processed**

The following are the main categories of personal data processed:

- Master data (e.g. name, date of birth, nationality, place of residence, etc.)

- Personal Data (in the documents) you submitted during application (e.g. references, certificates, education, résumés)

- Bank account details

- Contact data (e.g. e-mail address, (cell) phone number, IT user ID)

- Log data recorded while using IT systems

- A profile created on the data subject in order to find the relevant position

- Other data, relevant to the recruitment process

1. **Sources of personal data**

As a rule, your personal data is collected directly from you during the application process. Alternatively, we may collect your contact data from CV databases – in this case we handle this data only until the first contact with you, and promptly delete in case of your rejection of contact.

When particularly sensitive positions are being filled, an additional check of your application data and background might be necessary. The result of this check will be documented in the applicant management system. If a background check is required, you’ll be expressly notified during the application process. These checks are carried out as per the local statutory regulations. For this purpose, only carefully selected service providers are used.

1. **Transfer of data upon employment**

If we recruit you for a position, your data will be transferred from our applicant management system to our HR administration systems, where it will be stored as employee data and processed accordingly.

1. **Purposes of processing and legal bases**

We, and the external service providers we commission, process your personal data in compliance with the EU's General Data Privacy Regulation (GDPR), with the national data privacy laws and with any other applicable national laws. Your data is processed, in particular, during the applicant management process in preparation for an employment or student relationship with a legal entity of the PEC Group.

Where required under applicable laws, we rely on one of these legal bases:

* You have clearly given your voluntary consent to the processing;
* The processing is necessary for entering into, or performance of a contract to which you are party;
* The processing is necessary to comply with a legal obligation;
* The processing is necessary to protect the vital interests of an individual;
* The processing is necessary for the performance of a task carried out in the public interest; or
* PEC’s legitimate interest in tracking recruitment and managing its talent pool which are not overridden by your interests or your fundamental rights and freedoms which require protection of personal data

1. **Profiling**

PEC may offer relevant positions to the applicant with the express consent of the data subject. The search for a relevant position will be based on an analysis of the data subject's professional background, education, language skills and other data relating to the skills provided during the application process. Following this analysis, we will recommend a position based on the candidate's profile. No automatic decision making is done during the process. The analysis is conducted by one of the PEC Group entities, we don’t share personal data of applicants with third parties for this purpose.

1. **Disclosure**

Only the people involved in the application process (e.g. line managers and associates of the recruiting department, HR associates and associate representatives) have access to your personal data on a need-to-know basis. Furthermore, your application data may be disclosed to other parties if you are deemed suitable for another vacant position within the PEC Group. You will be informed about this via e-mail and your consent is required to activate any new application.

We will disclose your personal data to other data controller only if necessary for the application, if we or the third party has a legitimate interest in this disclosure, or if you have provided your consent. You will find the details of the legal bases in the section “Purposes of processing and legal bases.” The third parties we may disclose your personal data with are either the other legal entities of the PEC Group or the data processors listed in the section “Contractors and service providers (data processors). If data is disclosed to third parties on the basis of a legitimate interest, such cases will be explained in data privacy statement. In some cases, we also use the services of various providers in order to meet contractual and or statutory obligations. You will find a list of these contractors and service providers in the section “Contractors and service providers (data processors).”

1. **Contractors and service providers (data processors)**

We have selected our service providers carefully and monitor them at regular intervals, particularly to ensure that they handle your personal data with due care and store it securely. We obligate all our service providers to observe confidentiality and comply with the statutory regulations. Other legal entities of the PEC Group may also be defined as service providers.

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| **Service providers** | **Type of processing** |
| Credence Background Screening Limited  160 London Road, Sevenoaks, Kent TN13 1BT  Registration No. 2998939 | Applicant background check. |

1. **Disclosure to recipients outside the European Economic Area**

We disclose your personal data to contractors, service providers or Group companies located outside of the European Economic Area (EEA) only if the EU Commission has confirmed that the third country in question has appropriate levels of data privacy or if other appropriate data privacy guarantees (e.g. binding corporate regulations on data privacy or standard EU contractual clauses) are in place.

On request, we will provide you with a list of the recipients in third countries and a copy of the specifically agreed regulations to ensure appropriate levels of data privacy. Contact details for this purpose can be seen above in the ‘Contact details of the data controller and the data privacy officer'.

1. **Duration of storage; retention periods**

We delete your personal data as soon as it is no longer required for the above-mentioned purposes, or we no longer have any legitimate interest in its retention. After completion of the application process, your personal data is further stored if we are obligated for such storage under the national law. Furthermore, your personal data may be stored for the period during which claims may be made against us.

1. **Security during data processing**

We take all the necessary technical and organizational measures to ensure appropriate levels of security and to protect your personal data particularly from the risks of unintended or unlawful destruction, manipulation, loss, alteration, or disclosure to or access by unauthorized third parties. We are constantly trying to improve our security measures and keep them state of the art.

1. **Your rights**

If you wish to assert any of your rights, please refer to the Contact section. While contacting us, please ensure that you can be identified individually.

1. **Right to rectification or erasure**

You may demand that we correct the incorrect data and complete the incomplete data or erase your data; provided the statutory requirements are met.

This does not apply to the data that is required for invoicing or accounting purposes or that is subject to statutory retention periods. If access to such data is not required, processing of the data will be restricted (see below).

1. **Objection to data processing in cases of “legitimate interest”**

You are also entitled to object at any time to our processing your data, provided you can lawfully claim a legitimate interest. In such cases we will cease processing your data, unless we can demonstrate - in accordance with the statutory provisions - compelling legitimate grounds to continue its processing that outweighs your interests.

1. **Withdrawal of consent**

If you have provided us your consent to process your data, you may withdraw it at any time with effect for the future. This shall have no effect on the lawfulness of our processing of your data prior to withdrawal of consent or any processing based on legal bases other than your consent.

1. **Right to complain to a data privacy authority**

You are entitled to file a complaint with a data privacy authority. You can contact either the data privacy authority responsible for your place of residence or Belgian state, or the data privacy authority responsible for the PEC Group.

The data privacy authority responsible for the PEC Group is:

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| **Belgium**:  Data Protection Authority  Gegevensbeschermingsautoriteit Drukpersstraat 35, 1000 Brussel  +32 (0)2 274 48 00 +32 (0)2 274 48 35 [contact@apd-gba.be](mailto:contact@apd-gba.be) |
| **Hungary**:  National Authority for Data Protection and Freedom of Information  H-1055 Budapest, Falk Miksa u. 9-11. Hungary  Tel.: +361 391 -1400  Fax: +361 391 -1410  E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) [www.naih.hu](http://www.naih.hu) |
| **Germany**:  Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Office address:  Königstrasse 10a  70173 Stuttgart, Germany Postal address:  P.O. Box 10 29 32 70025 Stuttgart GERMANY  Phone: +49 (0)711/615541-0  Fax: +49 (0)711/615541-15  E-mail: [poststelle@lfdi.bwl.de](mailto:poststelle@lfdi.bwl.de) |

Annex 1: PEC Group Legal entities taking part of the recruitment process

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| **NAME** | **Address** |
| PEC NV | 3001 Leuven, Technologielaan 12., Belgium |
| PEC Central Europe Kft. | 1013 Budapest, Lánchíd utca 23., Hungary |
| PEC Germany GmbH. | Senefelderstraße 15, 86368 Gersthofen, Germany |
| PEC North America, Inc. | 2385 NW Executive Center Drive Suite 100, Boca Raton FL,33431, USA |
| PEC SE Asia Sdn. Bhd. | 368-04-15 Bellisa Row Jalan Burmah 10350 Georgetown Penang, Pulau Pinang |