# Privacy policy of DenizBank AG for applicants

# (1) Controller and scope

The controller within the meaning of the EU General Data Protection Regulation (hereinafter: GDPR) and other national data protection laws of the Member States as well as other data protection regulations is:

#### DenizBank AG

Thomas-Klestil-Platz 1
A-1030 Vienna
Austria

Tel.: +43 (0) 505-105/2000

E-Mail: <u>humanresources@denizbank.at</u>

Website: www.denizbank.at

This privacy policy applies to the processing of applicant data and to the application process for positions at DenizBank AG.

# (2) Data protection officer

The data protection officer of the Controller is:

#### **Andreas Waberer**

Thomas-Klestil-Platz 1

1030 Vienna

E-Mail: datenschutz@denizbank.at

If data subject rights within the meaning of point (7) of this privacy policy (e.g. right to information, right to erasure, etc.) are asserted, these requests or applications can be sent to <a href="mailto:humanresources@denizbank.at">humanresources@denizbank.at</a> or by regular mail to Thomas-Klestil-Platz 1, 1030 Vienna, Austria.

# (3) What is personal data?

Personal data is any information relating to an identified or identifiable natural person. This includes, for example, information such as your name, your age, your address, your telephone number, your date of birth or your e-mail address. Information for which we cannot (or can only with disproportionate effort) establish a reference to your person, e.g. by anonymizing the information, is not personal data. The processing of personal data (e.g. the collection, retrieval, use, storage or transmission) always requires a legal basis or your consent.

# (4) Data processing

## a) Scope and purpose of data processing

We primarily collect and use personal data that you have provided to us directly or via an external personnel service provider as part of the application process. Furthermore, in the course of the application process, we may also process data that we collect about you ourselves (e.g. through notes taken during the interview or publicly accessible sources such as the press, internet and other media) insofar as this is necessary and we are permitted to process this data in accordance with the statutory provisions.

We process your personal data for the purpose of handling the application process and to ensure the best possible recruitment. In particular, your data will be processed to check and assess your suitability for a vacant position.

The following data in particular is processed for these purposes:

- Given and surname
- Contact information (e-mail address, cell phone number)
- Address
- Date of birth
- Citizenship
- Professional experience
- Education data

- Photo (if provided by you)
- Curriculum vitae
- Salary expectations
- all other data transmitted or collected in the course of the application process (e.g. other data resulting from CV, application documents, certificates, references, etc.)

Your personal data will not be used for any other purpose. Your personal data will not be used for advertising purposes or transferred to third parties without your consent, except in the cases described below or unless we are legally obliged to disclose data.

## b) Legal basis

When processing personal data that is necessary for the performance of a contract to which the data subject is a party, Art. 6 para. 1 lit. b GDPR serves as the legal basis. This also applies to processing operations that are necessary for the performance of pre-contractual measures. The application process involves pre-contractual measures, which is why Art. 6 para. 1 lit. b GDPR is the main legal basis for the processing of data in the course of the application process (unless another legal basis is described below).

Art. 6 para. 1 lit. f GDPR serves as the legal basis if the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms. We process your data on the basis of legitimate interests in order to compare your application with other open positions within DenizBank AG in order to find the best possible candidate for each position. However, your data will not be passed on to third parties for this purpose.

Insofar as we obtain your consent for the processing of personal data, Art. 6 para. 1 lit. a EU General Data Protection Regulation (GDPR) serves as the legal basis for the processing of personal data. Consent serves in particular as a basis for keeping your data on file for any future vacancies at DenizBank AG that might match your profile.

Insofar as the processing of personal data is necessary to fulfill a legal obligation to which DenizBank AG is subject, Art. 6 para. 1 lit. c GDPR serves as the legal basis. As a bank and potential employer, we are subject to various legal obligations. These are primarily statutory or collective agreement requirements (e.g. GKK registration, crediting of previous service periods), but also regulatory or other official requirements.

### c) Data erasure and storage duration

We store data that we have received on the basis of an application for the duration of the application process (necessary for the performance of pre-contractual measures). In addition, if your application is rejected, we store data from the application process on the basis of our legitimate interest in being able to defend ourselves against any claims arising from the application process. Such storage takes place for a maximum of 7 months after the end of the application process, whereby the erasure takes place automatically. Any further storage of your data will only take place in the event of employment or if you have expressly consented to your data being kept on record.

In the course of the erasure, the personal login data that you provided when creating the account will also be deleted. You will be informed of the erasure of your data separately by e-mail. For applications that are to be made after the erasure of your data, you would have to create a new account, whereby the same e-mail address can be used again.

If the application leads to employment, your data will be processed further on the basis of the employment. In this case, you will be provided with a separate privacy policy for employees.

## d) Automated decision making

No automated decision-making systems are used in the course of the application process (in particular, no Al-driven pre-selection takes place).

# (5)Cookies

We do not set any cookies on our applicant portal that would require your consent. Only the following cookies are used, which are technically necessary to ensure the functionality of the site:

Name: ASP.NET\_SessionId

Domain: career.denizbank.at

Expiry: When closing the session

Name: AspxAutoDetectCookieSupport

Domain: career.denizbank.at

Expiry: When closing the session

Name: TS01be9555

Domain: career.denizbank.at

Expiry: When closing the session

Name: \_\_AntiXsrfToken

Domain: career.denizbank.at

Expiry: When closing the session

# (6) Recipients or categories of recipients of your data

## a) General

Within our company, your data will be received by those departments or employees who need it to handle the application process for the specific position (e.g. managers, employees and specialist departments who are looking for a new employee or are involved in the decision on filling the position). Furthermore, on the basis of our legitimate interest, we may also process your application and forward it internally for the purpose of checking whether other vacancies are suitable for you. However, your application will never be forwarded to third parties in this context without your consent.

Otherwise, we will only pass on your personal data to third parties if:

- you have given your express consent to this in accordance with Art. 6 para.
   1 lit. a GDPR
- there is a legal obligation for the disclosure pursuant to Art. 6 para. 1 lit. c
   GDPR teht
- the disclosure is necessary to safeguard legitimate company interests (Art. 6 para. 1 lit. f GDPR) such as the assertion of or the defense against legal claims and there is no reason to assume that you have an overriding interest worthy of protection.

Furthermore, personal data may also be transferred to processors (service providers), provided that they comply with the data protection requirements specified in writing and undertake to maintain confidentiality. If we utilize a processor, we remain responsible for the protection of your data.

## b) Third country data transfer

Some of the recipients mentioned above may be located outside Austria or outside the European Union or may process your personal data outside Austria or outside the European Union. The level of data protection in these countries may not correspond to that of Austria or the member states of the European Union. In this context, we would like to point out that we only use processors outside the European Union if an adequacy decision has been issued by the European Commission for the third country in question, if we have agreed suitable guarantees (e.g. current standard contractual clauses), if suitable guarantees are in place, e.g. if we have agreed binding internal data protection regulations with the processor or if you have given us your express consent. In such cases, we take all measures to ensure that all recipients offer an appropriate level of data protection.

# (7) Video surveillance in the branches & head office

DenizBank AG uses video cameras in branches / the head office for the purpose of preventive protection of people and property. In the branches, their field of view covers part of the branch area. It is expressly stated that the video cameras are not used to record job interviews. It is stated that the video surveillance recordings will be deleted after 30 days at the latest (outside cameras after 72 hours at the latest). Storage

beyond this time will only take place if this is necessary for the purpose of securing evidence in the event of criminal acts. In the course of the personal interview, it will usually be necessary to enter places that are under video surveillance, at least for a short time.

# (8) Data subject rights

### a) Right to information

In accordance with Art. 15 GDPR, you can request information about your personal data that is processed by us. In particular, you can request information about the processing purposes, the categories of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right to lodge a complaint, the origin of your data if it was not collected by us, about a transfer to third countries or to international organizations and about the existence of automated decision-making including profiling and, if applicable, meaningful information about its details.

### b) Right to rectification

In accordance with Art. 16 GDPR, you can immediately request the correction of incorrect or the completion of your personal data stored by us.

## c) Right to erasure

In accordance with Art. 17 GDPR, you can request the erasure of your personal data stored by us, unless the processing is necessary to exercise the right to freedom of expression and information, to fulfill a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.

#### d) Right to restriction of processing

In accordance with Art. 18 GDPR, you can request the restriction of the processing of your personal data if the accuracy of the data is disputed by you, the processing is unlawful, we no longer need the data and you object to the deletion because you need

it to assert, exercise or defend legal claims. You also have the right under Art. 18 GDPR if you have objected to the processing pursuant to Art. 21 GDPR.

## e) Right to data portability

In accordance with Art. 20 GDPR, you can request to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or you can request that it be transferred to another controller.

# f) Right to lodge a complaint

In accordance with Art. 77 GDPR, you have the right to lodge a complaint with a supervisory authority. You can contact the supervisory authority of your usual place of residence, your workplace or our company headquarters.

## g) Revocation of consent

In accordance with Art. 7 para. 3 GDPR, you can revoke your consent to us at any time. As a result, we may no longer continue the data processing(s) based on this consent in the future.

#### h) Right of objection

If your personal data is processed on the basis of legitimate interests in accordance with Art. 6 para. 1 lit. f GDPR, you have the right to object to the processing of your personal data in accordance with Art. 21 GDPR if there are reasons arising from your particular situation or if the objection is directed against direct advertising. In the case of direct marketing, you have a general right to object, which we will implement without you having to specify a particular situation. In case of objection we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

# (9) Data security and security measures

We are committed to protecting your privacy and treating your personal data confidentially. In order to prevent manipulation, loss or misuse of your data stored by

us, we take extensive technical and organizational security precautions, which are regularly reviewed and adapted to technological progress.