

## PRIVACY POLICY – MyPal Recruiting (PALFINGER career portal)

We want to inform you about:

- who we are and how you can get in touch with us,
- which of your personal data we process, how and for what purposes,
- what rights you have in connection with this data processing.

To view this document in **other languages** please click [here](#).

### 1. RESPONSIBLE and CONTACT

**PALFINGER AG** (Lamprechtshausener Bundesstraße 8, 5101 Bergheim, Austria) **together** with the respective **subsidiary** in contact with you (hereinafter jointly referred to as "PALFINGER", "we", "us") are **responsible** for the processing of your personal data. A list of all PALFINGER companies can be found [here](#).

If you have any questions about data processing when using our career portal or about exercising your rights as a data subject, please contact our **Group Data Protection Officer** Alexander Mestian at [dataprotection@palfinger.com](mailto:dataprotection@palfinger.com), by post at Data Protection, PALFINGER AG, Lamprechtshausener Bundesstraße 8, 5101 Bergheim, Austria or via our [web form](#).

### 2. INTRODUCTION and DEFINITIONS

PALFINGER AG operates the career portal "MyPal Recruiting" for all PALFINGER companies to handle the Group's internal recruitment process.

To apply for a job at PALFINGER or to use other services of our career portal, it is necessary to create an applicant profile. With your profile you can then submit your application. Your personal data will be treated in strict confidence and processed in compliance with the applicable data protection laws in accordance with the following principles.

**Personal data** means all information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you, your household, or device. **Processing refers** to all actions performed on applicant data, such as collecting, recording, organizing, storing, transferring, modifying, using, disclosing or deleting.

### 3. INFORMATION on the COLLECTION OF PERSONAL DATA

Your data will be used exclusively for the following **purposes**:

- Creating an applicant profile for the career portal (MyPal Recruiting),
- the technical support of your applicant profile,
- carrying out the application process.

We process the following **personal data** for this purpose:

For creating an applicant profile (mandatory):

- |                        |   |
|------------------------|---|
| • E-mail address       | • Consent to the privacy policy   |
| • First and last name  | • Preferences for the visibility of the profile                           |
| • Country of residence | (for jobs within the entire PALFINGER Group or only for the selected job) |

For the application process:

Mandatory:

- First and last name
- Salutation/gender
- Address
- Phone number
- E-mail address
- Curriculum vitae
- Necessary job-specific data
- Necessary country-specific data (see [point 9.](#))

Voluntary:

- Image
- Language skills
- Former employers
- Cover letter/letter of motivation
- Experience abroad, willingness to relocate
- Certificates (education, driver's license)
- Date of birth
- Country of residence
- Expected salary
- Notice period
- Work permit (if required)
- Further data provided voluntarily by you

Data processing is based on your **consent**. You can **revoke** this **at any time**. The data collected is necessary to ensure an efficient application process. The creation of an applicant profile does not constitute an application.

#### 4. STORAGE DURATION and DELETION

Your data will be stored from the time you give your consent until you withdraw it. Your **applicant profile** will be automatically deleted after **two years of inactivity**. If you are hired for the position in question, your data will be retained for the duration of the established employment relationship. If you are not hired for the position in question, your **application will be deleted six months after the position has been filled**.

Please note the country-specific differences in the deletion periods under [point 9!](#)

You can also delete your data yourself at any time by deleting your profile or deleting individual applications/documents. You can also contact us at [dataprotection@palfinger.com](mailto:dataprotection@palfinger.com) or by post. If there are compelling legal reasons for not deleting your data, we will inform you immediately.

If you delete your profile or revoke your consent, not only your account information but also all current applications sent to us will be withdrawn.

#### 5. RECIPIENTS, PROCESSORS and DATA TRANSMISSION

Access to your data is restricted to those **employees of the PALFINGER Group** who require access as part of the personnel selection process ("need-to-know" principle, e.g. HR department, hiring manager). All employees who have access to your data are specially trained in data protection and are obliged to maintain confidentiality.

You can control the visibility of your data within the **PALFINGER Group** in your profile settings. Depending on the setting, your profile is visible to:

- Recruiters who administer the advertised position (option: "only for the position for which I have applied")
- All recruiters of the PALFINGER Group (option: "for positions within the PALFINGER Group")

Data protection agreements and a code of conduct exist between the companies of the PALFINGER Group to ensure the security of your data. A list of all subsidiaries can be found [here](#).

MyPal Recruiting is a cloud solution that PALFINGER procures from an **external service provider** (processor). PALFINGER also uses external service providers for the development and technical support of the system. They have access to your data as part of their service. These processors are software development companies based within the European Economic Area. PALFINGER always selects its service providers carefully and contractually obliges them to handle the transferred data in compliance with data protection regulations. The service providers are bound by our instructions and are checked for compliance with their guaranteed security measures.

Within the PALFINGER Group and when using external service providers, **your data** may be **transferred to another country**. Such a data transfer will only take place in compliance with the legal requirements on the basis of an adequacy decision or other suitable guarantees. A copy of the guarantee will be provided to you on request.

Your data will **not be passed on** by us to other responsible parties (**third parties**) outside the PALFINGER Group unless this is required by law, necessary to assert legal claims or to protect the vital interests of the data subject or other persons.

If other service providers or third parties are used, we will inform you of this in the description of the respective additional service under [point 7](#).

## 6. YOUR RIGHTS

**Right to information:** On request, we will be happy to provide you with information free of charge about the data processed in relation to your person. To do so, please contact us at [dataprotection@palfinger.com](mailto:dataprotection@palfinger.com), by post or using our [web form](#).

**Right to rectification:** If, despite our efforts to ensure that your personal data is correct and up to date, incorrect personal data is stored, we will rectify it at your request.

**Right to erasure:** If you no longer wish your data to be processed by MyPal Recruiting, please inform us at [dataprotection@palfinger.com](mailto:dataprotection@palfinger.com) or by post. We will delete your data immediately. If there are compelling legal grounds for not deleting your data, we will notify you.

**Right to restriction:** You can also request the restriction of data processing. As a result, the data stored about you may only be processed with your individual consent or for the assertion and enforcement of legal claims.

**Right of objection/revocation:** Consent given can be revoked at any time in writing and free of charge. Your data may then no longer be processed. The legality of the previous processing remains unaffected. Furthermore, you can object to processing operations that are based on a balancing of interests (see respective service description under [point 7](#)). In this case, we ask you to state the reasons for your objection. In both cases, you can contact us at [dataprotection@palfinger.com](mailto:dataprotection@palfinger.com) or by post.

**Right to data portability:** If you wish to receive the data you have provided or transfer it to another controller, we will provide it in an electronically transferable format.

**Right to lodge a complaint with the data protection authority:** You have the right to lodge a complaint with the data protection authority if you consider that the processing of personal data concerning you infringes applicable data protection laws. However, we ask you to contact us first in the event of a suspected breach so that we can clarify and resolve this matter in the interests of a good relationship.

**Anti-discrimination:** Candidates who exercise their rights in accordance with the relevant data protection laws will not be discriminated against.

## 7. FURTHER FUNCTIONS OF OUR PLATFORM

### 7.1. Notification service about vacancies

You can activate a notification service via your applicant profile, which will inform you by e-mail about jobs vacancies at PALFINGER, provided they match the search criteria you have entered. The search criteria can be adjusted in the options of your profile. You can also deactivate the service at any time.

### 7.2. "Quick Apply" function

The "Quick Apply" function makes it possible to **apply without prior registration** in the career portal. The feature is provided by a software development company as an external service provider based within the European Economic Area.

All you need to do is upload your CV. It will then get automatically parsed, meaning the relevant applicant data such as first name, surname, e-mail address and postal address are extracted from the CV and transferred to the corresponding form fields of the application. It is possible to correct the data before submitting the application.

An applicant profile will be automatically created for you in the career portal and you will receive a confirmation email with your access data. You can then manage your profile yourself.

Apart from that your data will be processed as indicated.

## 8. SECURITY OF YOUR DATA and AUTOMATED DECISION-MAKING

PALFINGER uses technical and organizational measures to protect the integrity, confidentiality, security and availability of your data. The rights protection also depends on you. If we have given you (or if you have chosen) a password to access our career portal, you are responsible for keeping this password confidential. We ask you not to disclose your password to third parties.

**No automated decision-making takes place** in the entire personnel selection process.

## 9. COUNTRY-SPECIFIC REGULATIONS

Depending on the country in which the PALFINGER company to which you are applying is located, additional regulations may apply in accordance with local data protection laws.

Please note the following special regulations in addition to the information already provided!

### 9.1. USA and Canada

Collection of further data:

For applications to PALFINGER companies in the USA or Canada, it is necessary to collect additional personal data. This is considered **sensitive data** and is subject to special protection. These are:

- **Information on protected classes** (e.g. race, color, gender, age, religion, national origin, disability, military status and citizenship)

- **Medical information** (e.g. results of drug screenings, information on disabilities, certifications related to requests for family and/or medical leave or other medical information voluntarily provided by the applicant)

Modified deletion periods:

- Applicant profile→ Deletion after **two years** of inactivity
- Individual application→ Deletion **one year** after filling the position

Additional means of contact:

If you have any question or wish to exercise your rights as a data subject, please contact us using the contact details provided above or by telephone on **+1 833 823 8668**.

Security of data transmission:

Unfortunately, the transmission of information via the internet is not completely secure. Although we take security measures to protect your applicant data, we cannot guarantee the security of your personal data transmitted to our career portal. Any transmission of personal data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures on the Careers Portal.

## **10. DATA PROTECTION when CONTACTING US**

If you contact us, your details, including personal data, will be transmitted to us, processed further and stored by us in order to process your inquiry. Your data will be used exclusively for the purpose of responding to your inquiry and will be deleted no later than six months after the processing activity has been completed.

## **11. AMENDMENT to this DATA PRIVACY STATEMENT**

This privacy policy is revised from time to time. The processing of your data is subject to the current version. You will be notified of any significant changes to this privacy policy in good time before any changes are made.