

PRIVACY NOTICE TO JOB APPLICANTS

www.dietsmann.com



I. INTRODUCTION

This Privacy Notice provides information about the processing of the personal data of applicants for a job with any subsidiary of Dietsmann Corporate Holdings Ltd., a company which has its registered office at Stasikratous, 20 Krambi Building, flat/office 201, 1065 Nicosia, Cyprus (collectively and individually hereinafter: 'Dietsmann', 'we' or 'us').

This Privacy Notice indicates which personal data may be collected, used, disclosed and/or stored by DIETSMANN on which legal grounds and for what purpose(s), as well as to which persons such personal data may be provided.

This Privacy Notice may be changed over time. The current version of this Privacy Notice can be viewed on and downloaded from DIETSMANN's website at any time. This Privacy Notice does not cover the links within this site linking to other websites. Those sites are not governed by this Privacy Notice, and if you have questions about how a site uses your information, you should check that site's privacy statement.

II. WHEN DOES THIS PRIVACY NOTICE APPLY

This Privacy Notice is applicable to the processing by DIETSMANN –in relation to its recruitment and hiring activities- of the personal data of applicants for jobs at DIETSMANN. DIETSMANN subsidiaries may have their own local version of a Privacy Notice to meet local legislation or standards. The rationale behind these local notices is aligned with the global but differences may exist on a more detailed level due to local legislation. In case of conflict between the global and local Privacy Notices, local notices will govern.

This Privacy Notice does not apply to the personal data of our clients, suppliers and other business partners, or to the personal data of our employees. You may read our Privacy Notice to Business Partners on our website. Our Privacy Notice to Employees is only published on the DIETSMANN Intranet site.

III. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA

DIETSMANN and its subsidiaries are the controller and/or processor of the personal data that fall within the scope of this Privacy Notice. When processing your personal data, DIETSMANN is committed to ensuring compliance with applicable data protection laws and regulations. The Privacy Team of DIETSMANN is responsible for overseeing this Privacy Notice.

IV. ON WHICH LEGAL GROUNDS AND FOR WHAT PURPOSES MAY DIETSMANN PROCESS YOUR PERSONAL DATA

DIETSMANN ensures that your personal data is only processed for any of the following lawful purposes: (i) to comply with a legal obligation, (ii) when necessary in the context of a contract, (iii) in furtherance of DIETSMANN's legitimate interests, (iv) to protect an individual's vital interests, or (v) subject to having obtained prior consent. If personal data is being processed with your consent you have the right to withdraw your consent at any time without affecting the lawfulness of any processing that took place before your consent was withdrawn. When processing your personal data DIETSMANN ensures compliance with data



protection laws. The legitimate purposes for which we may process personal data are explained in more detail in the sub-sections to Section 4 below.

IV.1. SOCIAL NETWORKS, SUCH AS LINKEDIN, AND OTHER PUBLICLY AVAILABLE WEBSITES

We may collect your personal data from public profiles on social networks and other publicly-available websites if you reacted to the DIETSMANN's recruitment initiatives on such social networks and websites, or you signed up via the integrated functionality of such social networks, recruitment websites or our own websites. We may also collect your personal data from such sources if you provided a link to your profile on any such site as part of your job application or the curriculum vitae submitted with your job application.

We may also obtain your contact details from publicly available sources, including content that you have made public on social network sites or similar sites for professional purposes, in order to make initial contact with you for recruitment purposes. We will only contact you if you have made your contact details available for recruitment purposes and we will provide you with the clear option of asking ask us to stop contacting you regarding career opportunities and to remove your personal data from our systems.

We process your personal data for this purpose based on our legitimate interest. We may process your personal data to find suitable candidates for vacancies at DIETSMANN.

Which personal data do we process for this purpose?

For this purpose we process the personal data you have made public through your public profiles on social networks and any correspondence between you and our recruiters.

IV.2. IF YOU APPLY TO US THROUGH DIETSMANN'S WEBSITE, WE PROCESS YOUR PERSONAL DATA:

(a) To receive, review and reply to your job application

If you contact one of our recruiters, apply for a vacancy or register through DIETSMANN's careers website, the personal data you provide us is included in our recruitment database where it is managed and updated.

We process your personal data for this purpose as a preparatory step towards possibly entering into an employment contract with you.

You are not obliged to provide us with any personal data for this purpose. However, if we don't receive sufficient information from you to consider your eligibility and to communicate with you, we may not be able to consider you for a job at DIETSMANN.

Which personal data do we process for this purpose?

The data we process for this purpose includes, but may not be limited to, your name, contact details, address (optional) country of residence, citizenship status, the job you have applied for, and any recruitment information you have provided us, such as a link to your public social media account, your curriculum vitae, employment history, education history, skills, motivation, current compensation, and whether you are subject to a non-solicitation agreement. We may also process your correspondence with DIETSMANN with regard to job applications.



(b) To verify your job application information, check your references and assess your suitability for the job for which you have applied

Depending on the job for which you have applied, the job application process can include various selection procedures, such as interviews, on-site interviews, a language test and system screenings or coding interviews to evaluate your qualifications and fitness for the job and compatibility with DIETSMANN's company culture. To manage and execute your job application we may process your personal data and the feedback received about you. Our recruiter will inform you about the specific application process for the job you have applied for. Our recruiters may also check your references.

We process your personal data for this purpose as a preparatory step towards possibly entering into an employment contract with you

You are not obliged to take part in any component of the job application process or to otherwise provide us with any personal data for this purpose. However, if you do not participate in our job application process we may not be able to consider you for a job at DIETSMANN.

Which personal data do we process for this purpose?

For this purpose, we may process the information that you provided to us, feedback that we received from the interviewers who spoke with you, the outcomes of any test you completed and any communications between us.

(c) To make you an offer

If you have successfully completed a job application procedure we will prepare and email you an offer letter. This letter will include the employment conditions we would like to offer you at DIETSMANN. This offer remains conditional until the stated terms have been met, which can include the satisfactory outcome of a background check.

We process your personal data for this purpose as a preparatory step towards possibly entering into an employment contract with you

You are not obliged to provide us with any personal data for this purpose. However, if you do not provide us with sufficient information, we may not be able to offer you a job at DIETSMANN.

Which personal data do we process for this purpose?

For this purpose we may process the information that you provided to us in connection with the job you will be offered and the related salary, benefits and other remuneration. In addition, for the legitimate purposes of completing the offer we may also, subject to compliance with data protection laws, process specific personal data such as marital status, nationality, photograph, national ID card or passport details, residence permits, declaration of employment status, work permit/work authorization details, academic background (diplomas and certificates), availability, terms of employment, any photo or video files you submitted with your application and the results of the selection.

(d) To check your background

If you accept a conditional offer at DIETSMANN we may carry out a background check or screening. Depending on the job in question, the background check may be to verify the information you provided and/or to verify information about (the absence of) any criminal convictions.

We process your personal data for this purpose as a preparatory step towards possibly entering into an employment contract with you

You are not obliged to provide us with any personal data for this purpose. However, if we cannot perform a satisfactory background check, we may not be able to consider you for a



job at DIETSMANN. We only perform background checks to the extent permitted by the applicable law in your country.

Which personal data do we process for this purpose?

For this purpose we may provide your address, city, country, date of residency, phone number and email address (optional), date of birth, social security number and your envisioned starting date at DIETSMANN to the professional third party performing the screening. If on completion of the background check we have any concerns, we will liaise with you directly. If something in your background check indicates that we cannot hire you, we will notify you and, when legally required to de so, we will provide you with a copy of your background check report. When required to do so by applicable law we will also give you a reasonable period of time to dispute, correct, explain or otherwise respond regarding the information disclosed in the background check report.

(e) To protect your vital interests

We will process your personal data when this is necessary in order to protect your vital interests. This could, for example, be the case if you have a medical condition that we need to be aware of when you are visiting us at our premises.

We process your personal data for this purpose in order to protect your vital interest We are committed to processing your personal data if it is necessary to avoid a risk of injury or other damage to your health.

Which personal data do we process for this purpose?

For this purpose we may process your contact details, the contact details of your emergency contact, the location of the relevant DIETSMANN site and the relevant health data or other personal data that you have provided to us.

IV.3. IF YOU HAVE BEEN REJECTED FOR A PARTICULAR JOB AT DIETSMANN, WE MAY RETAIN YOUR PERSONAL DATA SO THAT WE MAY CONSIDER INFORMING YOU AND COMMUNICATING WITH YOU ABOUT FUTURE VACANCIES IN WHICH YOU MIGHT BE INTERESTED

What does this purpose entail?

Sometimes we simply do not have a job that would be right for you available at the time you apply. In this case we will hold information about you in our database so we can contact you if a vacancy that might be of interest to you arises. We may also invite you to participate in recruitment activities or communicate with you about other job opportunities.

For this purpose we process your personal data based on our legitimate interests. We may process your personal data to improve the success of our recruitment process. This will help us find the best matches between candidates and positions available within DIETSMANN.

Which personal data do we process for this purpose?

For this purpose we may process your contact details (such as your address and email address), the information you submitted to us in the course of previous job applications (for example, your curriculum vitae) and a summary of how you performed during previous job applications with us.



IV.4. FOR DATA ANALYSIS TO MANAGE AND IMPROVE DIETSMANN'S RECRUITMENT PROCESS, ORGANIZATIONAL DEVELOPMENT AND MANAGEMENT REPORTING

What does this purpose entail?

We may process your personal data, where possible rendered anonymous, pseudonymous or aggregated, to manage and improve our recruitment process and online career services. We may also process your personal data in order to prepare and perform management reporting and analysis. For example, we may conduct surveys to learn more about candidates' views and opinions of our recruitment team and process.

For this purpose we process your personal data based on our legitimate interests. We may process your personal data to improve our recruitment process. This will help us find the best matches between candidates and positions available within DIETSMANN, improve our recruitment initiatives and monitor compliance with DIETSMANN's policies.

Which personal data do we process for this purpose?

For this purpose we may process personal data obtained as part of your participation in our surveys.

IV.5. TO COMPLY WITH THE LAW

In some cases, DIETSMANN processes your personal data in order to comply with the laws and regulations of various countries related to, for example, human resources obligations, employment laws, anti-discrimination laws, or regulations related to subsidies. Laws and/or regulations may oblige us to disclose your personal data to government institutions or supervisory authorities.

We process your personal data for the purpose of complying with the law We will process your personal data if we are legally obliged to do so.

Which personal data do we process for this purpose?

The data we process for this purpose is the personal data required to comply with our specific legal obligations.

V. COOKIES

DIETSMANN may collect personal data through the use of cookies and similar technologies. Cookies are small files of information which save and retrieve information about your visit to our website – for example, how you entered our site, how you navigated through the site and what information was of interest to you. You can control and set your cookie preferences via your browser settings.



VI. WHO HAS ACCESS TO YOUR PERSONAL DATA

VI.1. ACCESS TO YOUR PERSONAL DATA WITHIN DIETSMANN

The DIETSMANN employees who are involved in your job application process are authorized to access and process your personal data only to the extent necessary to enable the applicable permitted purposes. If your application indicates your interest in working internationally we may pass your personal data to employees of our global affiliates in connection with possible opportunities at those affiliates.

VI.2. ACCESS TO YOUR PERSONAL DATA BY THIRD PARTIES

DIETSMANN may disclose personal data to third parties for the provision of their services to DIETSMANN in connection with the purpose for which we process your personal data. These third parties can include recruiters, screening agencies, travel agencies, lawyers and advisors. Furthermore, DIETSMANN may disclose personal data to public authorities when this is required by applicable laws or regulations. DIETSMANN will comply with applicable laws and regulations in disclosing personal data to third parties and commits itself to ensuring that the personal data is adequately protected and is processed solely for the specified permitted purposes.

VII. HOW IS YOUR PERSONAL DATA SECURED

DIETSMANN is committed to the protection of your personal data and has taken adequate safeguards to ensure its confidentiality and security. DIETSMANN has implemented appropriate technical, physical and organizational measures to protect personal data from unauthorized or unlawful disclosure, access, loss, damage or alteration.

When personal data is transferred to subsidiaries of Dietsmann Corporate Holdings Ltd., or to authorized third party service providers established within or outside the European Union, we take organizational, contractual and legal measures to ensure that the personal data is processed solely for the purposes mentioned above and that adequate levels of protection have been implemented in order to safeguard the personal data.

In the event of a data breach, if personal data has been exposed to risk DIETSMANN will notify the relevant authorities and the relevant individuals, subject to and in accordance with the provisions of applicable data protection laws and regulations.

VIII. HOW LONG DOES DIETSMANN RETAIN YOUR PERSONAL DATA

We retain your personal data until the recruitment and selection process has been completed. If your application has been successful the personal data gathered during the recruitment and selection process will be retained in accordance with DIETSMANN's Privacy Notice to Employees as published on DIETSMANN's Intranet site. You will be granted access to this site upon commencement of employment, engagement or internship.

If the recruitment and selection process has not led to a contract between us, and except as otherwise permitted or required by applicable law or regulatory requirements, DIETSMANN



will endeavor to retain your personal data only for as long as it deems necessary to fulfill the purposes for which the personal information was collected (including, if applicable, for the purpose of meeting any legal requirements or obligations).

IX. YOUR RIGHTS

Under the General Data Protection Regulation (GDPR) you have a number of rights with regard to your personal data. You have the right to request that we provide you with access to your data and that we rectify or delete (incorrect) personal data. You also have the right to restrict processing, object to processing and, in certain circumstances, the right to data portability.

If you have consented to your personal data being processed you have the right (in certain circumstances) to withdraw that consent at any time. Withdrawal of your consent will not affect the lawfulness of any processing that took place before your consent was withdrawn.

If you feel we have not respected your rights under the GDPR you have the right to lodge a complaint, either with the Supervisory Authority indicated below or with another Supervisory Authority within the European Union that is either related to your place of work or place of residence.

Commissioner for Personal Data Protection

1 Iasonos Street 1082 Nicosia Cyprus

Tel +357 22 818 456 Fax +357 22 304 565 e-mail: commissioner@dataprotection.gov.cy

Website: http://www.dataprotection.gov.cy

X. QUESTIONS AND CONTACT INFORMATION

Please help us keep your personal data records accurate and up to date by notifying Human Resources immediately if there is any change in your personal data.

You can, at any time, request access to, correction of or removal of the data that we process about you by sending a request to Human Resources or to privacy@dietsmann.com. If you have any questions regarding this Privacy Notice or its implementation within DIETSMANN, please contact privacy@dietsmann.com

Without prejudice to your rights under applicable law, DIETSMANN reserves the right to amend this Privacy Notice when necessary to reflect legal and regulatory changes and good business practices.

