

# Privacy policy for applicants

## in accordance with Art.13 and 14 of the General Data Protection Regulation (GDPR)

Data protection is important to us. The following information explains how we use your personal data and outlines your rights.

This data protection information is valid for candidates applying for a job in Eugen Forschner GmbH and her subsidiaries in Germany.

### 1. Entity responsible for data processing and contact person

Eugen Forschner GmbH  
Max-Planck-Straße 14  
78549 Spaichingen

Phone: 07424 943 136  
E-Mail: [info@forschner.com](mailto:info@forschner.com)

Managing Directors: Peter Decker, Dietmar Geiger, Marc Eckert

### 2. Contact details of the Data Protection Officer (DPO)

Bernd Knecht

Phone: 07021 487628  
E-Mail: [datenschutz@forschner.com](mailto:datenschutz@forschner.com)

### 3. Purpose and legal basis on which we process personal data

We process all personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG) and other relevant data protection regulations. You can find further details and additions to the processing purposes in our contract documents, forms, consent forms and other information provided to you (e.g. on our website or the application portal).

#### 3.1 for establishing an employment relationship (Art.88 GDPR in connection with §26 Abs.1 BDSG)

We process your personal data for the purpose of handling the application process with the aim of establishing an employment relationship with you if you are suitable and have been selected by us. The data is also processed electronically. This is particularly the case if you send us your application documents electronically, for example by e-mail or via our online platform.

#### 3.2 Consent (Art.6 para.1 (a) GDPR)

If you have given us your consent to process personal data, the respective consent is the legal basis for the processing mentioned there. This is the case, for example, if you allow us to store your application documents in our talent pool. You can revoke your consent at any time with effect for the future.

#### 3.3 Compliance with legal obligations (Art.6 para.1 (c) GDPR)

We process your personal data where required for compliance with a legal obligation.

#### 3.4 Legitimate interests pursued by us or a third party (Art.6 para.1 (f) GDPR)

We may furthermore use your personal data where necessary based on a weighing of interests to pursue our or a third party's legitimate interest. We may do so for the following purposes:

- for ensuring and exercising our domiciliary rights through appropriate measures (e.g. video surveillance, visitor registration) if an interview or meeting takes place on our premises
- to use tools to conduct online interviews and meetings if a face-to-face meeting is not possible due to geographical, scheduling or other circumstances
- for obtaining information and exchanging data with credit agencies if the signing of the contract goes beyond our economic risk
- for the limited storage of your data if deletion is not possible or only possible with disproportionate effort due to the special type of storage (e.g. in the data backup or mail archive)
- for the assertion of legal claims and defense in legal disputes that are not directly attributable to the contractual relationship with you

#### 4. Categories of personal data we process

We process the following data:

- Personal details (name, job title/position in company/sector and similar information)
- Contact details (address, email address, telephone number and similar information)
- Application documents (such as, e.g. CV, certificates, certificates of professional competence, references)
- All information that you voluntarily provide to us in connection with your application
- If applicable, audio and video information in connection with the use of online meeting software
- If applicable, login information and data in connection with video surveillance during an on-site visit
- Publicly available job-related information that can be viewed, for example, in social media networks such as Xing or LinkedIn
- If applicable, accounting data in connection with reimbursement of costs occurred due to a job interview in one of our facilities.

#### 5. Who will get to see your data?

We pass on your personal data within our company to the departments that require this data for the selection of applicants. Primarily this are members of the management board, division and department managers and employees in Human Resource Department. In single cases we also include colleagues in the team / department in the process of decision. Furthermore, the bodies that require your data to fulfill legal obligations or to implement our legitimate interest will receive it.

In addition to those, your information may also be passed on to the following:

- processors used by us (Art. 28 GDPR), service providers for supporting activities and other controllers within the meaning of the GDPR, in particular in the areas of IT services, logistics, courier services and letter post, printing services, external data processing centers, IT application support/maintenance, archiving, document processing, accounting and controlling, data destruction, purchasing/procurement, customer management, mailing services, letter shops, marketing, telephony, website management, tax accountancy, auditing services, credit institutions
- Public authorities and institutions if there is a legal or official requirement to provide, report or pass on information or if it is in the public's interest to disclose information
- Bodies and institutions on the basis of our or a third party's legitimate interest (e.g. authorities, credit agencies, debt collection agencies, lawyers, courts, experts and supervisory bodies)
- Other bodies that you have authorized us to provide with your data

#### 6. Transfer of personal data to a third country or international organization

We use Microsoft software for electronic communication (e-mail, online meetings, chat, etc.). Although it has been agreed with Microsoft that the data will be hosted on German or European servers, there is a theoretical possibility that third parties may have access to personal data of the data subjects due to legal requirements in the USA (CLOUD Act, Patriot Act, etc.). In order to limit this as far as possible, we or our processor have concluded corresponding agreements with Microsoft, which may contain further guarantees for compliance with the level of data protection.

Beyond this, no data processing takes place outside the European Union (EU) respectively of the European Economic Area (EEA).

#### 7. How long we'll keep your information

We store your personal data for as long as is necessary for the decision on your application. Your data will be deleted no later than six (6) months after the end of the application process. We may also continue to store data if this is necessary for the defense against possible legal claims.

If no employment relationship is established, but you have given us your consent for the further storage of your data in our talent pool, we will store your data until you withdraw your consent, but for a maximum total of 24 months from the date of receipt of your application).

## 8. To what extent do we use automated individual decision-making (including profiling)?

We do not use any purely automated decision-making processes in accordance with Art.22 GDPR. Should we intend to use such a procedure at a later date, we will inform you separately as part of our legal obligation to notify you.

## 9. Your data protection rights

You have the right of access under Art.15 GDPR, the right to rectification under Art.16 GDPR, the right to erasure under Art.17 GDPR, the right to restriction of processing under Art.18 GDPR and the right to data portability under Art.20 GDPR. ***In principle, there is a right to object to the processing of personal data by us in accordance with Art.21 GDPR, provided that the processing is based on a legitimate interest (Art.6 para.1 (f) GDPR). However, this right to object only applies if there are very special circumstances relating to your personal situation, whereby our company's rights may conflict with your right to object. You can also object to the processing of your personal data for the purpose of direct marketing at any time.***

If you wish to assert one of these rights, please contact the controller or our data protection officer. You will find the contact information under chapter 1. and 2. in this data protection information.

## 10. Ihr Beschwerderecht bei der zuständigen Aufsichtsbehörde

If you consider the processing of your personal data unlawful, you can lodge a complaint with a supervisory authority that is responsible for your place of residence or work or for the place of the suspected infringement (Art. 77 GDPR). The supervisory authority responsible for us is:

The State Commissioner for Data Protection and Freedom of Information (LfDI-BW)  
Lautenschlagerstrasse 20  
70173 Stuttgart, Germany  
  
Phone: +49 (0) 711 / 615541-0  
Email: [poststelle@lfdi.bwl.de](mailto:poststelle@lfdi.bwl.de)  
Web: <https://www.baden-wuerttemberg.datenschutz.de>

## 11. Scope of the data you are required to provide

You only need to provide the data that is required for the application process. Without this data, we will generally not be able to carry out the application process with you and establish an employment relationship. Should we ever request any data in excess of this essential data, we will specifically make you aware of the fact that provision of such data is voluntary.

## 12. Status and Updating of this data protection information

This data protection information is the current version valid since 12<sup>th</sup> June 2025. We reserve the right to update this data protection information at any time, in order to comply with legal practice and changed behavior of public authorities and / or to improve data protection and privacy.