

APPLICANT PRIVACY STATEMENT

Last updated September 2nd 2024

Your privacy is important to us and to Société Générale Group to which Ayvens belongs. This is a matter of priority for us, and we have implemented strong principles in that respect, especially in regards of the EU General Data Protection Regulation. Ayvens and its affiliated entities (hereafter “**Ayvens**”) value the trust of applicants and candidates and are committed to protecting their personal data.

This Applicant Privacy Statement (the “**Statement**”) describes our practices in connection with the personal information (“**Personal Data**”) that we collect through the careers section of the websites of Ayvens the “**Careers Site**”) and offline in connection with your application for a job or internship with Ayvens. Please note that the Careers Site is not intended for persons under the age of sixteen (16).

Personal Data submitted elsewhere on Ayvens’ and its affiliates’ websites will be used in accordance with our [Global Privacy Statement ALD | Ayvens](#).

1. WHO ARE WE?

Ayvens is responsible for the processing of your Personal Data (controller), and in the Republic of Croatia it refers to two legal entities: Ayvens Croatia d.o.o., PIN number (OIB): 45116797997 (upon incorporation with the former legal name ALD Automotive d.o.o., registered under MBS: 080512512) and Ayvens Fleet Services Croatia d.o.o., PIN number (OIB): 55788995943 (upon incorporation with the former legal name ALD Fleet Services d.o.o., registered under MBS: 080719803)

Address: Veliko Polje (Grad Zagreb), Betinska ulica 1

Ayvens may also be referred to as “**we**”, “**our**” or “**us**”.

2. WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

We collect and process information about you for a variety of reasons. Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, storage, or erasure (“**Processing**”).

Where none of the purposes and legal grounds apply and also in case, we process your Personal Data based on your consent, your decision to provide Personal Data to Ayvens is voluntary. Where the provision of Personal Data is a statutory or contractual requirement, or a requirement to enter into the employment agreement, we will inform you about this. If we collect or process Personal Data based on your consent, you may withdraw your consent at any time without consequences. The withdrawal of consent shall not affect the lawfulness of the processing based on such consent before its withdrawal.

We collect information provided by you in connection with your application, including:

- Name, surname, address, telephone number, e-mail address and other contact information;
- Work authorization status;
- Curriculum vitae (CV), motivation and/or cover letter, previous work experience and career history, education information, qualifications, and governmental confirmation of good conduct;
- Skills and experience;
- Professional and other work-related licenses, permits and certifications held, where applicable;

- In the case of pre-employment background checks, gender, date and place of birth and nationality when the screening for sanctions and embargoes renders a hit and further analysis needs to be conducted;
- Results of assessments, such as pre-employment background checks, if this is part of the application process;
- Information relating to references; and
- Any other information you provide us with (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards, or professional memberships).

Ayvens is an equal opportunity employer, which means we offer equal treatment to all applicants. In certain cases, depending on local rules and regulations, we are required to ask questions about racial or ethnic origin, gender, and disability of our applicants, for purposes of monitoring equal opportunity in our recruitment process. If not required by law, we will ask you to provide this information for the same purposes, which you can provide on a voluntarily basis. The relevant job vacancy will indicate whether the information is mandatory or voluntary. Otherwise, we ask that you avoid submitting information which may qualify as sensitive information and/or special categories of personal data under applicable law, except where such information is legally required.

Sensitive information and/or special categories of Personal Data include nationality or national origin, age, gender identity, marital status, racial or ethnic origin, religious or philosophical beliefs, sexual preferences or sexual orientation, physical or mental health information (including disability status), genetic or biometric information, biometric templates, political opinions or trade union membership, veteran status, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings.

Any information you submit through the Careers Site must be true, complete, and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action up to and including termination of employment in the course of your employment with Ayvens. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights.

If you provide us with Personal Data of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

3. HOW DO WE COLLECT YOUR PERSONAL DATA?

We and our service providers collect Personal Data in a variety of ways, including:

- **Through the “Careers” on website.** For example, when you submit your CV or apply for a job.
- **Offline.** For example, when you send us your CV by post or provide Personal Data by telephone.
- **From Other Sources.** Such as LinkedIn, recruitment agencies and other recruitment websites.
- **For the purpose of pre-employment background check reports** in connection with your application, and as permitted by applicable law, Ayvens obtains information about you from other sources, which include:
 - Your references;
 - Prior employers; and
 - Educational institutions you attended.

- **For the purpose of background check reports** in connection with a job offer provided to you, and as permitted by applicable law, Ayvens may obtain information from you about you, your dependents and/or anyone else in connection with you, for the purposes of:
 - Conduct and ethics;
 - Sanctions and embargoes;
 - Anti-money laundering and counterterrorism regulations;
 - Preventing (the appearance of) a conflict of interest;
 - The fight against corruption and influence peddling; and
 - U.S. person identification.
- **Through cookies and other tracking technologies.** We and our service providers use “cookies” and similar technologies on the Careers Site. Please see our [Cookies policy ayvens | Ayvens Croatia](#) for more information.
- **Assessments.** When an assessment is part of an application process, we receive the results of this assessment. It may be that we obtain this automatically after an assessment has been completed via an external party or that you share the outcome of an assessment with us.

4. WHY DO WE USE YOUR PERSONAL DATA?

We collect and process Personal Data about you for one or more of these reasons:

- a) Because this information is necessary to take steps prior to entering into an employment or internship;
- b) Because this information is of particular importance to us, and we have a specific legitimate interest to process it;
- c) To comply with a legal obligation;
- d) Because you voluntarily provide this information and consent for us to process it.

Where the collection or processing is based on your consent, you are free to refuse or withdraw consent at any time, without consequence to your application, to the extent permitted by applicable law. The withdrawal of consent shall not affect the lawfulness of the processing based on such consent before its withdrawal.

The information that you submit on the Careers Site will be used for Ayvens’ global personnel recruitment, management, and planning purposes, as permitted by applicable law:

- **To process your application.** We will engage in these activities to manage our prospective contractual relationship with you, where we have a legitimate interest to do so;
- **To assess your capabilities and qualifications for a job.** We will engage in these activities to manage our prospective contractual relationship with you, where we have a legitimate interest to do so;
- **To perform reference checks.** Certain vacancies require the provision of specific references. In such case, we use information to conduct reference checks. We will engage in these activities to comply with a legal obligation or where we have a legitimate interest to do so;
- **To communicate with you.** We will communicate with you about your application, and to send you information regarding the Careers Site and changes to our terms and policies. We will engage in these activities to manage our prospective contractual relationship with you;
- **To comply with or monitor compliance with any applicable law or regulation.** We will engage in these activities to comply with a legal obligation or where we have a legitimate interest to do so. Note that compliance with law can include laws outside your country of residence;
- **To perform pre-employment background checks.** Certain job offers require a pre-employment background check. In such case, we use information to conduct background checks if we offer you a position. We will engage in these activities to comply with a legal obligation or where we have a legitimate

interest to do so. The pre-employment background checks have the aim to guarantee the reliability, professionalism, and security of Ayvens as well as global security, integrity of the financial system, financial stability and sustainable growth;

- **Legitimate business purposes.** Where we have a legitimate business interest to do so, for example, for Ayvens' administrative purposes, internal aggregate management reporting or internal training; and
- **With your explicit consent,** but only for purposes where we request information that you can provide on a voluntary basis, such as consent to process diversity information for purposes of monitoring equal opportunity of our recruitment process.

If we hire you, Personal Data we collect in connection with your application can be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes.

Providing Personal Data to us through the Careers Site is voluntary. However, if you do not provide sufficient information, Ayvens may be unable to consider your employment application or, if you are hired, your subsequent promotion, transfer, or relocation.

5. WHO HAS ACCESS TO YOUR DATA?

We will limit access to Personal Data to personnel with a business need to know for the purposes described in this Statement, including personnel in the recruiting, human resources, and information technology departments, and in the department responsible for your interview and/or for the position for which you are applying.

Ayvens also shares Personal Data with our third-party service partners or providers to facilitate services they provide to us, including hosting and operating the Careers Site, recruiting assistance, assessments, and background check processing.

6. WHY PERSONAL DATA MAY BE TRANSFERRED TO THIRD COUNTRIES?

Ayvens is a global service provider that has clients and locations around the globe. For a list of the Ayvens affiliates and their locations, that jointly process and use Personal Data, see this SharePoint site [Ayvens - Better with every move | Ayvens](#).

The Personal Data we process for your application may be transferred to Ayvens organisations and our service providers in other countries than your country of residence. This allows us to consider you for vacancies throughout Ayvens. Some countries are considered to provide for an adequate level of protection of your Personal Data, according to EU standards. You can find a list of these 'adequate countries' [here](#). For the transfer of Personal Data to other countries, Ayvens has put in place adequate measures to protect your Personal Data, such as Standard Contractual Clauses.

You may obtain a copy of these measures by contacting us using the address in the "Contact Us" section below or by e-mail address gprzastitapodataka@ayvens.com.

7. WHO WE DISCLOSE YOUR DATA TO?

We also use and disclose your Personal Data as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- **To respond to requests from public and government authorities;**
 - These can include authorities outside your country of residence.

- **To cooperate with law enforcement;**
 - For example, when we receive law enforcement requests and orders;
- **To enforce our terms and conditions;** and
- **To protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others.**

8. DO WE USE YOUR DATA FOR OTHER PURPOSES?

We may also use your Personal Data for a purpose other than the initial purpose. This is subject to the condition that the secondary purpose is in line with the initial purpose. The following factors are inter alia taken into account: are the purposes clearly related; is the secondary purpose appropriate and/or expected, was the Personal Data obtained directly from you or in another way; what kind of Personal Data is concerned for the secondary purpose; what would be the implications for you; and what data protection measures are applied when using your data for the secondary purposes.

9. HOW LONG WILL WE KEEP YOUR DATA?

Personal Data of applicants applying for a job will be kept for the duration of six (6) months after the application process is closed. We are in that case able to approach you for possible vacancies in the future. If you would like us to store your Personal Data for a shorter period, please contact us using the address in the “*Contact Us*” section below or by e-mail address gdprzastitapodataka@ayvens.com. After the relevant retention period, Ayvens will delete your Personal Data.

10. HOW DO WE SECURE YOUR DATA?

Ayvens will take appropriate organizational, technical, and administrative in accordance with applicable privacy and data protection laws and regulations, including requiring service providers to use appropriate measures to protect the confidentiality and security of Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please notify us in accordance with the “*Contact Us*” section below or by e-mail address gdprzastitapodataka@ayvens.com.

11. DOES THIS STATEMENT COVER THIRD-PARTY WEBSITES?

This Statement does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Careers Site links. The inclusion of a link on the Careers Site does not imply endorsement of the linked site or service by Ayvens or our affiliates.

12. WHAT IF YOU ALREADY HAVE A POSITION AT AYVENS?

If you currently work for Ayvens or one of our affiliates, you can use the Careers Site or preferably the internal careers site to apply for a different position within Ayvens. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with the HR manager for the new position concerning application eligibility, benefit programs and HR policies applicable to that position.

The Careers Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

13. CHANGES TO THIS STATEMENT

We reserve the right to amend this Statement at any time in order to address future developments of Ayvens, the Careers Site or changes in industry or legal trends. The “Last Updated” legend at the top of this Statement

indicates when this Statement was last revised. Any changes will become effective when we post the revised Statement on the Careers Site.

14. HOW CAN YOU CONTACT US?

If you have questions, requests, or complaints, please feel free to contact us via the contact page of the relevant Ayvens website or by sending an email message to gdprzastitapodataka@ayvens.com.

Because email communication is not always secure, please do not include sensitive personal information in the emails you send us.

15. HOW CAN I EXERCISE MY PERSONAL DATA RIGHTS?

If you register on the Careers Site, you may (i) access, (ii) review, (iii) change and (iv) delete your Personal Data stored therein by logging into the Careers Site and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change Personal Data that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your Personal Data if it changes or is inaccurate.

You may also, where permitted by applicable law, request a copy of your Personal Data that we keep, have these rectified, deleted or the processing thereof restricted (as appropriate), to object to the processing thereof or request portability of your Personal Data. Please make your request by contacting us as indicated below.

Please note that due to (among other things) the application process which you can enter via the Careers Site, we may not be required to comply (or fully comply) with your request. For instance, for as long as we have a relationship with you, or where personal data is kept in a backup system (for the purpose of restoring the data in case of a data loss event) and the data purging cycle may be different than applicable to the production system. In those circumstances, we will write to you explaining why we are unable to comply at that moment or, in the case of backup data, the request may be implemented at a later stage (when the backup is overwritten).

In your request, please make clear what Personal Data you would like to access or have changed or deleted, or otherwise let us know what limitations you would like to put on our use of your Personal Data.

For your protection, we only implement requests with respect to the information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. Please note that certain Personal Data may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

You may also:

- Contact Data Protection Officer via e-mail address gdprzastitapodataka@aldautomotive.com in regard any question related to this Statement.
- File a complaint if you believe Ayvens violates its Privacy Policy for the Management of Employee Data or your rights under applicable privacy and data protection laws and regulations.
- Lodge a complaint with a data protection authority for your country or region, or in the place of the alleged misconduct. Please see here [a link](#) to the national data protection authorities located in the European Union and the European Economic Area.