



## **Data protection notice for the applicant management process at Bosch Group**

### **We want you on our team!**

In this privacy notice, we inform you how your personal data is processed in the applicant management process at Bosch Group (in the following also “Bosch” or “we”/“us”). Additionally, we inform you about your rights under applicable data privacy laws.

### **Bosch respects your privacy**

Protecting your personal data and ensuring the security of all our business data are important concerns for us. We always consider these concerns in our business processes. The personal data collected when you apply online is treated confidentially and strictly in accordance with the statutory provisions.

Data privacy and information security are an integral part of our corporate policy.

### **Data controller**

The Bosch Group legal entity to which you submit your application using the application management system is responsible for processing your data. You will find the contact details of the controller in the job advertisement in the application management system.

### **Data categories processed**

The following are the main categories of personal data processed:

- Master data (e.g. name, date of birth, nationality, place of residence)
- Documents (e.g. references, certificates, résumés)
- Education and training details (e.g. data about school education, university, professional qualification)
- Payment data (e.g. bank account details for travel expenses)
- Organizational data in case of internal applications (e.g. personnel number, cost center, department)
- Communication data (e.g. e-mail address, (mobile) phone number, IT user ID in case of internal applications)
- Audio visual recording in the selection process e.g. for the Junior Managers Program (JMP)
- Log data recorded while using IT systems

These may also include special categories of personal data as per Art.9 para. 1 GDPR such as health data or religion or trade union membership.

### **Purposes of processing and legal bases**

We process your personal data in compliance with the EU’s General Data Privacy Regulation (GDPR), with the national data privacy laws and with any other applicable national laws.

The personal data processing takes place during the applicant management process particularly for the purpose of preparation for an employment relationship with a legal entity of the Bosch Group.

The main legal basis for this purpose is GDPR Article 6 para. 1(b) together with applicable national data protection laws (“in order to take steps at the request of the data subject prior to entering into a working contract”).

Other legal bases are:

- GDPR Article 6 para. 1(a) ) together with applicable national data protection laws (“Consent”): e.g. for Bosch applicant community as part of the applicant management system
- GDPR Article 6 para. 1(f) (“Legitimate interest”): We will always gently balance our legitimate interests in the organisation of our business (e.g. HR evaluations like personal controlling, analytical reporting) against your interest in protecting your personal data in accordance with the statutory provisions.

Whenever special categories of personal data are processed as per Art. 9 para. 1 GDPR in conjunction with the respective national data protection law (e.g. health data, religion, or union membership), this processing is carried out on the legal basis of Art. 9 para. 2(b) 1 GDPR in conjunction with the respective national data protection law. Furthermore, it may be necessary to process your health data in order to assess your ability to work in accordance with Art. 9 para. 2(h) 1 GDPR in conjunction with the respective national data protection law.

### **Children**

This applicant management platform is not meant for children under 16 years of age.

### **Collecting of personal data**

As a rule, your personal data is collected directly from you during the hiring process.

The easiest way to apply for a job at Bosch is a direct application for a position advertised on one of our job portals, where you enter your data in the candidate profile created individually for the advertised position. You hereby have the possibility to send us the data by connecting to a social network, by a manual input and/or by using “CV Parsing” (Transferring some data from your CV to our job portal).

The data from paper applications is transferred manually to the application system. You receive an email in order for you to activate your manually created application. In this email, we inform you, whether we will send your paper application back or shred it. If you do not activate your application within 30 days, your data is deleted from our application management system and you will not be considered any further in the selection process.

Additionally, you have the possibility to be referred by a Bosch Group employee. For this purpose, you need to give your application documents to this employee, who then uploads it in the application management system. You receive an email with which you can activate your application. If you do not activate your application within 30 days, your data is deleted from our application management system and you will no longer be considered in the selection process. Your application is linked with the employee who uploaded it in the application system. This helps us in identifying that this employee has referred you. Furthermore, this employee can track the status of your application (invitation, rejection etc.) on an overview page but has no access to the details of the application process.

We keep you up to date on the status of your application via e-mail.

During the application process, we will ask you whether we are allowed to forward your application data to other suitable open positions. If applicable, we may also offer you membership in a Bosch applicant community.

Staffing of particularly sensitive job positions may require a further check of your application data and your career path. The result of this check is documented in the application management system. We inform you about such checks in a transparent manner in the framework of our job advertisements. This check takes place taking local legal requirements into consideration and by involving carefully selected service providers.

#### **Membership of a Bosch applicant community**

If you become a member of one of our applicant communities upon invitation, you have the option to publish your data entered by you including the all the applications in the respective country for all the team members of the personnel department of the Bosch group in the respective country. By becoming a member of the community, you consent to be informed about interesting open positions and events. This may take place via e-mail or telephone. You may withdraw your consent at all times with effect for the future by contacting [SupportDeutschland.HRIT@de.bosch.com](mailto:SupportDeutschland.HRIT@de.bosch.com).

The invitation to join a Bosch applicant community may take place in form of a job advertisement but it includes a clear instruction that it relates to an applicant community.

#### **Participation in Bosch recruiting events**

Some Bosch locations organize Recruiting-Events in order to win potential candidates for multiple, similar job advertisement. Special event pages on different internet platforms inform about the contents of these events. You may apply for participation in these events by uploading your application in our application system via the link created for this purpose.

#### **Recipients of your personal data**

##### **- Within a legal entity of the Bosch Group**

Only the people involved in the application process (e.g. line managers and associates of the recruiting department, HR associates and associate representatives) have access to your personal data for the purposes mentioned above within the legal entity of the Bosch Group to which you have applied.

##### **- Other legal entities within the Bosch Group**

Other legal entities are data controllers themselves. The above mentioned persons involved in the recruiting process may belong to different companies of the Bosch Group. Therefore, your data may be transferred to the respective persons worldwide within the Bosch Group.

In case of your appointment, your data is transferred from our application management system to our HR-administration systems. In this process, your data may be transferred to a different legal entity and will thereafter be processed as employee data. An exchange of your personal data with other legal entities within the Bosch Group takes place especially in order to fulfill the contracts as well as due to our legitimate interest to organize the internal workflows (e.g. Shared Services, execution of transfers or relocations across legal entities).

##### **- Recipients outside the Bosch Group**

We may disclose your personal data to other data controller only if necessary, for the application, if the third party or we have a legitimate interest in this disclosure, or if you have provided your consent. You will find the details of the legal bases in the section "Purposes of processing and legal bases".

##### **- Data processors**

In addition, we use service providers to fulfill our contractual and legal obligations among other things. Insofar as these service providers processes personal data on our behalf, we have concluded the contracts required under the data protection law with them.

We select our service providers carefully and monitor them on a regular basis, especially regarding their diligent handling and protection of the data that they store and process. All service providers are obliged to maintain confidentiality and to comply with the statutory provisions. Service providers may also be other companies of the Bosch Group.

You will find a list of our contractors and service providers (with whom we have a long-term or ongoing business relationship) in *Annex 1*.

#### **Transfer to recipients outside the European Economic Area**

We might transfer personal data recipients outside of the European Economic Area (EEA). In such case prior to the transfer, we ensure that either the respective country provides an appropriate level of data protection due to a decision of adequacy by the European Commission, or due to other appropriate safeguards (e.g.

binding corporate rules on data protection or EU standard contractual clauses), or a legal basis authorises the transfer. You are entitled to receive an overview of third country recipients and a copy of the specifically agreed-provisions securing an appropriate level of data protection. For this purpose, please contact the Controller mentioned above.

Should a transfer to recipients outside the European Economic Area (e.g. authorities, courts, parties of a lawsuit or advisors) be necessary for the enforcement/exercise of or defense against legal claims, this shall be done in accordance with Art. 49 para. 1 e) GDPR.

#### **Duration of storage (in Germany)**

Principally, we store your data for as long as it is necessary for the purposes for which they were collected or processed or for as long as we have a legitimate interest in storing the data. In all other cases, we delete your personal data with the exception of data we are obliged to store for the fulfillment of legal obligations.

After conclusion of the application process (e.g. by rejection from our side or withdrawal from your side) we will delete your personal data in general within 4 months.

#### **Security during data processing**

We take all the necessary technical and organizational measures to ensure appropriate levels of security and to protect your personal data particularly from the risks of unintended or unlawful destruction, manipulation, loss, alteration, or disclosure to or access by unauthorized third parties. We are constantly trying to improve our security measures and keep them state of the art.

#### **Your Rights**

To enforce your rights, please use the information in the section "Contact information of the data protection officer". Please make sure that we can unambiguously identify you.

##### **- Right to information and access**

You have the right to obtain confirmation from us about whether or not your personal data is being processed, and, if this is the case, access to your personal data.

##### **- Right to correction and deletion**

You have the right to obtain the rectification of inaccurate personal data. As far as statutory requirements are fulfilled you have the right to obtain the completion or deletion of your data. This does not apply to data which is necessary for billing or accounting purposes or which is subject to a statutory retention period. If access to such data is not required, however, its processing is restricted (see the following).

##### **- Restriction of processing**

If the legal requirements are fulfilled, you can demand that we restrict the processing of your data.

##### **- Objection to data processing based on the legal basis of "legitimate interest"**

You have the right to object to the processing of your personal data at any time, insofar as this is based on legitimate interest. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements which override your rights.

##### **- Withdrawal of consent**

In case you consented to the processing of your data, you have the right to revoke this consent at any time with effect for the future. The lawfulness of data processing prior to your withdrawal remains unchanged.

#### **Data portability**

If the legal requirements are fulfilled, you may request to receive data that you have made available to us in a structured, common and machine-readable format or - if technically feasible - to request that the data be transmitted to a third party.

#### **Right to lodge complaint with supervisory authority**

You have the right to lodge a complaint with a supervisory authority. You can appeal to the supervisory authority, which is responsible for your place of residence or your state of residency or to the supervisory authority responsible for us.

The supervisory authority responsible for the Bosch-Group is the "Landesbeauftragte für den Datenschutz und die Informationsfreiheit in Baden Wuerttemberg".

Contact details of the supervisory authority:

##### Office address:

Lautenschlagerstraße 20  
70173 Stuttgart, GERMANY

Postal address:

P.O. Box 10 29 32  
70025 Stuttgart, GERMANY

Phone: +49 (711)/615541-0  
Fax: +49 (711)/615541-15  
Email: [poststelle@lfdi.bwl.de](mailto:poststelle@lfdi.bwl.de)

**Adjustments to the Data Protection Notice**

We reserve the right to adjust our security and data protection measures. In such cases, we will amend our data protection notice accordingly. Please, therefore, notice the current version of our data protection notice in the job advertisement.

**Contact information of the data protection officer**

You can reach our data protection officer under:

Data protection officer  
Information Security and Privacy (C/ISP)  
Robert Bosch GmbH  
Postbox: 30 02 20  
70442 Stuttgart  
GERMANY  
E-Mail: [DPO@bosch.com](mailto:DPO@bosch.com)

To assert your rights please use the following link: <https://request.privacy-bosch.com/>

Should the legal entity to which your request refers not be selectable on the linked page, or to notify a data protection incident please use the following link: <https://www.bkms-system.net/bosch-dataprotection>

Effective date: February 2022



**Annex 1:  
GDPR Data Privacy Notice**

<b>Service Provider</b>	<b>Processing</b>
SmartRecruiters GmbH Dircksenstraße 47 10178 Berlin SmartRecruiters SP. Z o.o. Fabryczna 20, 31-553 Krakow, Poland SmartRecruiters Inc. 225 Bush Street, San Francisco, CA 94104, USA	Provision and development of the cloud platform ("Software as a Service") for the above purposes. Processing of the provided personal data.
Signum GmbH Rungestraße 19 10179 Berlin	Processing of the personal data for career path check
Amazon Web Services Inc. 10 Terry Avenue North Seattle, WA 98109-5210, USA	Provision and operation of the technical infrastructure for the Cloud-Platform ("Platform as a Service")
Mailgun Technologies, Inc. 112 East Pecan Street Suite 1135 San Antonio, TX 78205, USA	Processing of the generated email communication between BOSCH and the applicant
Text Kernel BV Nieuwendammerkade 28A17 Amsterdam, Noord-Holland 1022 AB The Netherlands	Provision, operation and further development of the application to import the data from CVs (CV-parsing)
I.K. Hofmann Projektmanagement GmbH Lina-Ammon-Str. 19 90471 Nürnberg	Processing of personal data for video interviews / selection process
Catalytic Inc. 954 W. Washington BLVD Suite 700 Chicago, IL 60607	Processing of personal data for reimbursement of personal job interview expenses.