# Data privacy policy – for applicants

We are happy that you are interested in us or one of our group companies and are applying or have applied for a job. As a processor of personal data, VIENNA INSURANCE GROUP AG Wiener Versicherung Gruppe (hereinafter referred to as "VIG"), domiciled at Schottenring 30, 1010 Vienna, is committed to complying with data protection regulations, notably to the regulation (EU) 2016/679 from 27th April 2016 for the protection of individuals and the processing of individual-related data (GDPR).

This data protection policy, which was compiled in conformity with Article 13 GDPR, is intended to inform you about the processing of your personal data in the course of your application process.

## Who is responsible for processing data?

VIENNA INSURANCE GROUP AG Wiener Versicherung Gruppe, (hereinafter referred to as "**VIG**"), Schottenring 30, 1010 Vienna, <u>datenschutz@vig.com</u>, is responsible for processing personal data in the course of the application process and is regarded as in charge according to Article 4(7) GDPR if you apply or have applied for a job in VIG.

As an HR service provider in recruiting, VIG also processes data for applications for **Vienna International Underwriters GmbH**, Schottenring 27-29, 1010 Vienna, for **Wiener Städtische Wechselseitiger Versicherungsverein - Vermögensverwaltung - Vienna Insurance Group**, Schottenring 30, 1010 Vienna as well as for **VIG IT- Digital Solutions GmbH**, Schottenring 30, 1010 Vienna and **VIG platform partners GmbH**, Schottenring 30,1010 Vienna. If you apply or have applied to one of these entities, the corresponding entity is the "controller" in terms of data protection law and VIG acts as "processor" in terms of Article 28 GDPR for this controller.

### I. Why do we collect data and what is the legal basis for this?

We process your personal data due to your application in compliance with Article 6(1) General Data Protection Regulation (GDPR), primarily on the basis of your consent to the processing of your personal data (Article 6(1)(a) GDPR), as well as in order to take steps prior to entering into a potential employment contract (Article 6(1)(b) GDPR), Article 9 (2)(a) GDPR (explicit consent) and, where applicable, for the purposes of our legitimate interests (Article 6(1)(f) GDPR) (due diligence, as the case may be to assert or prevent legal claims).

#### II. What information do we collect?

The information contained in your application as well as all other personal data, that is provided by you in the course of the application process or is established with regard to you in the course of the application process, including information on candidate evaluation, is processed by VIG for the purposes of fulfilling requirements of personnel administration as well as for technical and administrative reasons.

The information which you provide to us has to be true, may not infringe any copyrights or other intellectual property rights, press law, general rights of third parties or ethical principles ("illegal content"). Please also note that you will hold us harmless against any claims that arise against us due to illegal content that was submitted to us by you via file attachments.

We collect various kinds of information:

# 1. Personal data

If you apply for a job, the following data will be stored:

- a) description of your employment history, skills and education
- b) contact details that allow you to be identified, e.g. your name, nationality, telephone number and e-mail address ("personal data")
- c) you also have the option of providing us with your date of birth and gender, as well as attaching documents stored electronically to your application, such as a cover letter, CV, certificates and a photograph.
- d) in addition, you can add an application video to your application or create a video via the application tool. The inclusion of an application video is voluntary and when you choose to do so, you provide your consent to the processing of the application video. Not providing an application video will have no influence on the outcome of your job application.

If you already were interviewed by us in the course of a job interview, we will also store this information about you. In addition, the written correspondence between you and VIG will be stored as well.

# 2. Attachments and special categories of personal data

Please ensure that you do not send us any attachments with viruses or worms.

During the application process, we do not process any special categories of personal data in the meaning of Article 9(1) GDPR ("personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation"). Therefore, please ensure that you do not send us any special categories of personal data, or attachments containing such data. Should you decide to create an application video and special categories of personal data are visible in this video (especially ethnic origin, health data), by creating or uploading the video you give your explicit consent to the processing of the data. Special categories of personal data that are visible in the application video at any given time during the application process without any consequences.

### 3. Statistical data

The data in our database can be used to generate statistics. However, this information is pseudonymised, and does not allow the identity of a particular user to be determined.

### 4. Your activities

If you are applying for several positions at the same time or are re-applying for a different position, we have the option of saving information on your activities. Multiple applications are welcomed and tracking your activities enables us to send you even more suitable job offers. You can inform us by e-mail (<u>datenschutz@vig.com</u>) if you do not consent to details of your activities being saved. You can also erase individual pieces of information from the database, or request us to do this for you. This also applies to application videos.

#### 5. Cookies

Onlyfy uses cookies in various places. These are used to make our website content more user-friendly, more effective and safer. Cookies are small text files that are stored on your computer.

#### III. Who obtains access to your data?

Authorised VIG Group Human Resources employees and the VIG managers responsible have access to your CV and your data. If your application concerns Vienna International Underwriters GmbH, Wiener Städtische Wechselseitiger Versicherungsverein - Vermögensverwaltung - Vienna Insurance Group, VIG IT- Digital Solutions GmbH or VIG platform partners GmbH, your application documents will also be sent to them.

#### IV. Who processes your data?

Your data is managed directly by VIG. The electronic storage of data is carried out in our data centres, which are operated under the responsibility of twinformatics GmbH, a 100% VIG group company. twinformatics GmbH, based in Vienna, is ISO 27001:2013 certified, which guarantees the highest possible security and data protection. For online applications we use the cloud-based applicant management system of the German company New Work SE (formerly Prescreen International GmbH), based in 20457 Hamburg, Strandkai 1.

In addition, contractual partners commissioned by us (in particular Individuum Team Organisation Personalmanagement GmbH with its registered office in 1030 Vienna, Landstraßer Hauptstraße 88/18, twinformatics GmbH, Obere Donaustraße 63, 1020 Vienna) and subsidiary companies (in particular WIENER STÄDTISCHE Versicherung AG Vienna Insurance Group with its registered office in 1010 Vienna, Schottenring 30) receive the data that they require to perform their respective services.

We have concluded Data Processing Agreements in accordance with Article 28 GDPR with twinformatics GmbH and New Work SE as well as with Individuum Team Organisation Personalmanagement GmbH and WIENER STÄDTISCHE Versicherung AG in order to ensure the protection of your data.

# V. How long will your personal data be stored for processing?

VIG stores your personal data in accordance with the statutory requirements regarding storage and documentation obligations. VIG will store your personal data for a period of up to 8 months after the end of your application procedure in accordance with statutory requirements. If you have given your express consent, your data will be kept in the applicant pool for up to 3 years in total after the end of your application procedure. The erasure of the data at the end of this period is automatically carried out.

## VI. Automated decision-making in individual cases, including profiling

During the application process, we do not use automated decision-making of any kind, including profiling, in the meaning of Article 22 GDPR.

# VII. Your data protection rights

Under data protection law, you have the right to information about personal data relating to you (Article 15 GDPR), and to the rectification of your personal data should the personal data processed by us be incorrect or incomplete (Article 16 GDPR). In addition, where permitted by law (Article 17 and 18 GDPR), you also have the right to erasure and restriction of processing of your personal data. If we collect and process your personal data on the basis of your consent, you have the right to data portability (Article 20 GDPR). This means that you receive the data in a structured, common and machine readable format and can demand the transfer of data to a third party if this is technically feasible. If we collect and process your personal data on the basis of your consent at any time. Such withdrawal does not affect the lawfulness of processing carried out on the basis of your consent prior to withdrawal.

If you wish to exercise your potential rights to information, rectification, erasure, restriction of processing, data portability and the right to object to processing with regard to your personal data, please send an e-mail containing the relevant request to <u>datenschutz@vig.com</u> to the controller. We will reply within the time specified by law and without undue delay.

If you believe that processing of your data breaches data protection law or that your entitlements under data protection law have been otherwise infringed, you may make a complaint to the controller (see contact details) or to the Austrian data protection authority, Barichgasse 40-42, 1030 Vienna.

## VIII. Contact details of the controller

The controller within the meaning of Article 4(7) GDPR is the entity to which you have submitted your application.

VIENNA INSURANCE GROUP AG Wiener Versicherung Gruppe, Schottenring 30, 1010 Wien <u>datenschutz@vig.com</u>

Vienna International Underwriters GmbH, Schottenring 27-29, 1010 Wien <u>datenschutz@vig.com</u>

Wiener Städtische Wechselseitiger Versicherungsverein – Vermögensverwaltung – Vienna Insurance Group, Schottenring 30, 1010 Wien datenschutz@vig.com

VIG IT - Digital Solutions GmbH, Schottenring 30, 1010 Wien <u>datenschutz@vig.com</u>

VIG platform partners GmbH, Schottenring 30, 1010 Wien <u>datenschutz@vig.com</u>

## IX. Modifications

In order to comply with both the ongoing technical and legal developments, VIG reserves the right to adapt this data protection policy accordingly to the data protection regulation at any time.