

DATA PROTECTION POLICY

1. Fundamentals

The protection of your privacy is important to us. We comply with the relevant applicable legislation when processing and using personal data.

This policy statement is intended to inform you, as an applicant, and our other business partners about the nature, scope and purpose of processing personal data in connection with the use of the services of ALLEGRO Consulting and its affiliated companies, visits to our websites, the use of the ALLEGRO Job Lounge and any other contractual assignments, and about your rights as an affected individual.

Certain of the terms used in the following policy statement are defined below:

- ▶▶ *Personal data relates to information by means of which these can be allocated to an identified natural person or by means of which a natural person can be directly or indirectly identified. These personal data include, inter alia, names, addresses (including invoice and delivery addresses), telephone numbers, email addresses, bank account details, dates of birth, data issued by public authorities (e.g. driver's license numbers, personal identification numbers and passport numbers).*
- ▶▶ *A data subject is a natural person whose personal data are processed.*
- ▶▶ *Data processing relates to any handling of personal data, extending from their capture to their organisation, modification, analysis, request, transfer and storage until such time that these are deleted.*
- ▶▶ *The GDPR is a regulation promulgated by the European Parliament and the Council on the protection of natural persons with regard to the processing of their personal data.*

2. Personal data processed by ALLEGRO and its affiliated companies

We capture, process and use your personal data in compliance with the applicable data protection legislation only

- ▶▶ with your consent for the specific purposes agreed pursuant to Article 6 (1a) GDPR, or
- ▶▶ in order to undertake the performances defined by the contract we have entered into with you and those pre-contractual performances associated therewith pursuant to Article 6 (1b) GDPR, or
- ▶▶ where processing is necessary for the purposes of the legitimate interests pursuant to Article 6 (1f) GDPR according to which the storage in our database of the personal data you have provided enables us to identify and contact you in the event of a suitable vacant position, or
- ▶▶ in the event of another legal basis existing, as defined by the GDPR.

We only process those personal data which are necessary in order to be able to perform and provide our services associated with the performance of a contract and the performance of pre-contractual undertakings, and/or those which you have provided on a voluntary basis in the context of your application, your job description or other aspects associated with the performance of the relevant contract.

The following data are generally processed in the course of handling applications and application processes:

- ▶▶ *Name*
- ▶▶ *Date of birth*
- ▶▶ *Place of birth*
- ▶▶ *Address*
- ▶▶ *Email*
- ▶▶ *Telephone number*
- ▶▶ *Nationality*
- ▶▶ *Gender*
- ▶▶ *Education*
- ▶▶ *Qualifications*
- ▶▶ *Curriculum vitae*
- ▶▶ *Language skills*
- ▶▶ *Certificates*
- ▶▶ *References*

Please note that it is not necessary to disclose any special categories of personal data, as defined by Article 9 GDPR, such as your social insurance number, religious denomination, trade union affiliations and/or sexual orientation. We therefore request that you do not provide us with any such sensitive data.

The personal data you disclose to us as an applicant and your associated documentation (e.g. CV, certificates, references) and the profile we prepare will be processed by ALLEGRO and its affiliated companies for the purposes of facilitating a contract of employment and forwarded to potential employers only after previously obtaining your explicit consent. Without these personal data, it is neither possible to accept your application nor to inform you about suitable vacant positions.

3. Rights of data subjects

As a data subject, you have the right to be informed about your stored personal data, their origins and recipients, and the purpose of the data processing. You also have the right to insist on the correction, transfer, to object to and/or restrict the processing of your personal data, and to demand the blocking or deletion of incorrect or inadmissibly processed data.

Please inform us accordingly if your personal data change. You have the right to withdraw your consent to the use of your personal data at any time. Please send any requests for information, deletion, correction, objections and/or data transfers (in as far as these do not entail disproportionate efforts) to the address defined under Point 12 of this policy statement. You will be required to establish your identity if you wish to gain access to your personal data.

If you believe that our processing of your personal data is in violation of the applicable data protection legislation or your data protection rights have been infringed in some other manner, you have the right to lodge a complaint with the competent supervisory authority. In Austria, this is the Austrian Data Protection Authority (*DSB*).

4. Data security

Your personal data are protected by means of appropriate organisational and technical precautions. These precautions relate in particular to the prevention of unauthorised, illegal or coincidental access to and the processing, loss, use and manipulation of your personal data. Despite our efforts to at all times appropriately comply with high standards in terms of due diligence, it cannot be excluded that information you provide us via the Internet may be viewed or used by other individuals.

We therefore accept no liability of any kind for the disclosure of information on the grounds of errors relating to data transfer and/or unauthorised access by third parties for which we are not accountable (e.g. hacking of email accounts or telephones, interception of faxes, etc.).

5. Data usage

We commit not to process the personal data provided to us for any purposes other than those defined by your assignment or our mutual contract, your consent, the performance of our legal obligations, our legitimate interests or other justification consistent with the GDPR legislation. The only exception to the above relates to the use of personal data for statistical purposes provided that the data made available have been subjected to pseudonymisation.

6. Provision of data to third parties

In order to perform your assignment, it may be necessary to forward your data to third parties (e.g. IT service providers and other service providers which we resort to in order to perform our activities and which we provide with data). Your data shall only be forwarded on the basis of the applicable data protection legislation, in particular for the purposes of fulfilling your assignment or on the grounds of your existing consent.

Applicants' data shall only be forwarded to potential employers after your explicit consent has been obtained.

Certain of the abovementioned recipients of your personal data may be located or process your personal data abroad. The level of data protection existing in countries outside the EU and the EEA may not be consistent with that existing in Austria. However, we only transfer personal data to countries which have been assessed by the EU as possessing an appropriate level of data protection or we undertake action in order to ensure that all recipients of personal data have established an appropriate level of data protection.

7. Advising data breaches

We always strive to ensure that any data breaches are identified at an early stage and, if necessitated, that these breaches and the relevant data categories affected are reported to you and/or the competent supervisory authority without delay.

8. Data storage

We will not store any personal data for longer than this is necessary or permitted in order to fulfil our contractual and/or legal obligations (particularly with regard to mandatory data storage periods), for the assertion of or defence against any liability claims or on the grounds of other justifiable legal reasons.

9. Cookies

This website employs so-called cookies in order to make our online offering more user-friendly, effective and secure.

A cookie is a small text file which we transfer to the cookie file of your browser on your hard disk via our web server. This enables our website to again recognise you as a user when a connection is established between our web server and your browser. Cookies help us to determine the frequency and the number of users visiting our Internet pages. The contents of the cookies we use is restricted to an identification number which can no longer be traced to any specific user. The main purpose of a cookie is to identify visitors to the website.

Two types of cookies are used on this website:

- ▶▶ *Session cookies: These are temporary cookies which are stored in the cookie file of your browser until you leave our website, after which they are automatically deleted.*
- ▶▶ *Persistent cookies: In order to improve usability, cookies are stored on your end device and enable us to identify your browser the next time you visit our website.*

You have the option of defining your browser settings so that you are informed about the setting of cookies and such that cookies are only permitted in a single case, only in specific cases or are generally not permitted, as well as the option of activating the automatic deletion of the cookies when closing your browser. Deactivating cookies may restrict the functionality of this website.

10. Server log files

In order to optimise our website in terms of system performance, user-friendliness and the provision of useful information about our services, the provider of the website automatically captures and stores information in so-called server log files which your browser sends to us automatically.

This relates to the following non-personal data:

- ▶▶ *Browser type and version*
- ▶▶ *Operating system used*
- ▶▶ *Referrer URL (the website previously visited)*
- ▶▶ *The host name of the accessing computer (IP address)*
- ▶▶ *The time and date of the server request*

11. Updating our data protection policy

We may need to update this data protection policy from time to time in order to reflect internal changes and amendments to the applicable legislation.

12. Contact details

If you have any questions or remarks about this data protection policy or the processing of your personal data, please contact us at:



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