

# Employee and Applicant Privacy Notice

As a modern and service-oriented company, Protiviti GmbH (hereinafter also referred to as "Protiviti" or "we/us") attaches great importance to the protection of your personal data.

For this reason, we want to ensure that all employees and applicants are informed about the processing of their personal data and can rely on their privacy and rights always being respected. It serves to provide transparent information about data processing in our company and to fulfill the legal requirements for data protection.

This privacy policy is aimed exclusively at applicants and employees. You can view our general privacy policy [here](#).

## I. Controller and Data Protection Officer

### Controller

Protiviti GmbH  
Mainzer Landstraße 50  
60325 Frankfurt am Main  
[privacy-emea@protiviti.com](mailto:privacy-emea@protiviti.com)

### Data Protection Officer

Attorney-at law Olga Stepanova  
C/O bytelaw Koch Stepanova Veeck  
Partnerschaft v. Rechtsanwälten mbB  
Bockenheimer Landstraße 51-53  
60325 Frankfurt am Main  
[stepanova@byte.law](mailto:stepanova@byte.law)

## II. Processing of your personal data

### 1. Employees

#### a. HR management

We manage the personal data required for the performance of the employment relationship in a digital personnel file. Only a limited group of people have access to this personnel file and will only pass this information on to other departments, such as accounting, to the extent permitted by law.

**Processed data categories:** Master data (first name, last name, any previous names, date of birth, gender); private and company contact data

(e-mail address, telephone number, postal address); CV data (education and other qualifications, professional career); salary and remuneration data (salary, bonuses, special payments, other individual remuneration and expenses); bank details (account holder, IBAN, BIC, bank name); work authorization (only if necessary or required by law); tax and social security data (social security number, tax ID, church tax characteristics); career data (evaluations, promotions); tax and social security data (social security number, tax ID, church tax details); career data (evaluations, promotions) working time data (agreed and completed working hours, absences and reason); participation in mandatory training; employment law documents (warnings, cautions, dismissals); emergency contact data (name and contact details of emergency contact); photos and videos (purely voluntary and only after consent has been given); contract data (your employment contract and any existing supplementary agreement); data on relevant criminal convictions

**Purpose of processing:** Administration and organization of HR matters

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** The provision of the personal data listed above, unless marked as voluntary, is mandatory for the performance of the employment relationship and to comply with legal requirements for the employer.

**Legal basis:** We process this data to carry out the employment relationship in accordance with Art. 6 para. 1 lit b. GDPR and to fulfill our legal obligations pursuant to Art. 6 para. 1 lit c. GDPR in conjunction with social security and tax law provisions. We collect your consent regarding the taking of photos and videos and the creation of an emergency contact in accordance with Art. 6 para. 1 lit a. GDPR.

**Retention period:** We store your personal data for the duration of the employment relationship and to a limited extent beyond that for the purpose of fulfilling our retention obligations. We only process personal data processed based on consent until you withdraw your consent, or the employment relationship ends, whichever occurs first. Your bank and social security data will be collected once and then removed from your personnel file.

**Recipient category:** Software provider, cloud storage provider

**Location of recipients:** EU and non-EU

**Safeguards for data transfers to third countries:** EU standard contractual clauses (SCC)

**Revocation of consent:** If we base the processing of your personal data on your consent, you can revoke this at any time in accordance with Art. 7 para. 3 GDPR. To do so, please contact: [privacy-emea@protiviti.com](mailto:privacy-emea@protiviti.com). The

legality of the processing carried out up to that point on the basis of your consent is not affected by the revocation.

## **b. Payroll and compensation management**

In addition to your salary, you may receive other remuneration for your work, such as bonuses and special payments. Furthermore, we will reimburse you for any expenses incurred, provided that these are reimbursable expenses in individual cases or in accordance with our guidelines. The processing of personal data is mandatory in order to carry out the calculations and payments.

**Processed data categories:** Salary and remuneration data (salary, bonuses, special payments, other individual remuneration and expenses); bank details (account holder, IBAN, BIC, bank name); work permit (if necessary); tax and social security data (social security number, tax ID, church tax characteristics); working time data (agreed and performed working hours, any relevant longer working hours that have an impact on remuneration)

**Purpose of processing:** Calculation and payment of salary and other remuneration

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** The provision of the personal data listed above is mandatory for the performance of the employment relationship and to comply with legal requirements for the employer.

**Legal basis:** We process this data to carry out the employment relationship in accordance with Art. 6 para. 1 lit. b GDPR and to fulfill our legal obligations in accordance with Art. 6 para. 1 lit. c GDPR in conjunction with social and tax law provisions.

**Retention period:** We store this personal data about you for the duration of the employment relationship. If the employment relationship ends, we restrict their processing to the purpose of fulfilling our retention obligations under Section 41 of the German Income Tax Act for payroll accounting (6 years) and under Section 147 of the German Fiscal Code for social security documents (10 years)

**Recipient category:** Software providers, cloud storage providers, payment service providers, authorities, auditors

**Location of recipients:** EU and non-EU

**Safeguards for data transfers to third countries:** EU standard contractual clauses (SCC)

## **c. Working time recording- and management**

Irrespective of our guidelines for enabling flexible working hours and, where applicable, employment contract regulations, we are legally obliged to record the working hours of our employees. The processing of your personal data is essential for this purpose.

**Processed data categories:** Master data (first name, last name); company contact data (e-mail address); working time data (start, end and duration of daily working time, break times, any relevant longer absences that have an impact on remuneration, purpose for which the working time was spent)

**Purpose of processing:** Provision and implementation of time recording

**Source of the data:** We collect this data directly from you

**Obligation to provide the data:** The provision of the personal data listed above is mandatory for the performance of the employment relationship and to comply with legal requirements for the employer.

**Legal basis:** We process this data based on our legal obligation pursuant to Art. 6 para. 1 lit c. GDPR in conjunction with Section 3 para. 2 of the Occupational Health and Safety Act.

**Retention period:** We store this data for the period of recording and control and beyond that for a further 2 years.

**Recipient category:** Software providers, cloud storage providers

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

#### **d. Vacation and absence management**

Absences, whether planned or unplanned, may occur and we respect this. To maintain our business operations, plan our capacities and comply with legal regulations, these absences must be reported and processed in accordance with our internal guidelines.

**Processed data categories:** Master data (first name, last name); absence data (absence, type, duration)

**Purpose of processing:** Maintaining our business operations, capacity planning and compliance with legal requirements.

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** The provision of the personal data listed above is mandatory for the performance of the employment relationship and to comply with legal requirements for the employer.

**Legal basis:** We process this data for the performance of the employment relationship in accordance with Art. 6 para. 1 lit. b. GDPR, to fulfill our legal obligations pursuant to Art. 6 para. 1 lit c. GDPR in conjunction with Section 7 of the Federal Vacation Act and based on our legitimate interest pursuant to Art. 6 para. 1 lit f. GDPR. Our legitimate interest lies in maintaining our business operations and capacity planning.

**Retention period:** We store your personal data for the duration of the employment relationship. If the employment relationship ends, we restrict the processing of this data to the purpose of fulfilling our retention obligations, e.g. from Section 16 para. 2 of the German Working Hours Act.

**Recipient category:** Software providers, cloud storage providers

**Location of recipients:** EU and non-EU

**Guarantees for transfer to third countries:** EU standard contractual clauses (SCC)

#### **e. Workation-management**

The work-life balance of our employees is important to us. In addition to our internal flexible working time regulations, we also enable our employees to work from other countries ("workation"). When applying for this, the processing of your personal data is essential.

**Processed data categories:** Master data (first name, last name, date of birth, place of birth); nationality; gender; contact data (residential address); geographic data (country of payroll, country of social security); health insurance data (name and type of health insurance); professional data (job title, department, date of entry, employee ID, name of supervisor); workation data (duration and location of stay, number of workation days taken and entitled to date); tax data (tax liability in the country of travel, existence of a bank account in the country of travel)

**Purpose of processing:** Fulfillment of legal obligations in connection with your workation.

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** There is neither a legal nor a contractual obligation to provide the data. However, if the data is not provided, we will not be able to approve your workation.

**Legal basis:** We process this data for the performance of the employment relationship in accordance with Art. 6 para. 1 lit b. GDPR and to fulfill legal obligations under social security law pursuant to Art. 6 para. 1 lit c. GDPR.

**Retention period:** We store your personal data for the duration of the employment relationship. If the employment relationship ends, we limit their processing to the purpose of fulfilling our retention obligations.

**Recipient category:** Software providers, cloud storage providers

**Location of recipients:** EU and non-EU

**Safeguards for transfer to third countries:** EU standard contractual clauses (SCC)

#### **f. Business trip management**

In the course of your work for us, you may have to travel on business. In this context, it is necessary to process your data in order to organize your business trip.

**Processed data categories:** Master data (first name, last name); company contact data (e-mail address, telephone number, postal address); remuneration data (expenses); bank details (account holder, IBAN, BIC, bank name); identification data (details of your identity card or passport, if necessary for bookings and certificates); visa data (necessity and existence of a visa); travel data (period, location, accommodation, transportation); emergency contact data (contact details of a person to be contacted in an emergency)

**Purpose of processing:** Booking, administration and execution of the business trip, obtaining legally required documents and verification and reimbursement of expenses incurred.

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** The provision of the personal data listed above is mandatory for the employer to carry out the employment relationship.

**Legal basis:** We process this data for the performance of the employment relationship in accordance with Art. 6 para. 1 lit b. GDPR.

**Retention period:** We store your personal data for the duration of the employment relationship. If the employment relationship ends, we limit their processing to the purpose of fulfilling our retention obligations.

**Recipient category:** Software provider, cloud storage provider

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

## g. Compulsory trainings

We are legally obliged to regularly train our employees on topics such as occupational health and safety, data protection and fire protection. Participation in these training courses is mandatory and is documented.

**Processed data categories:** Master data (first name, last name, personnel number); company contact data (e-mail address); participation data (time of participation, successful or unsuccessful completion of training)

**Purpose of processing:** Provision, implementation and monitoring of participation in the mandatory training courses

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** The provision of the personal data listed above is necessary for us to fulfill our legal obligations.

**Legal basis:** We process this data on the basis of our legal obligation pursuant to Art. 6 para. 1 lit c. GDPR in conjunction with Section 12 of the Occupational Health and Safety Act and Art. 32 GDPR.

**Retention period:** We retain this data for the duration of participation, as well as for the period resulting from the statutory retention periods for occupational health and safety.

**Recipient category:** Software provider, cloud storage provider

**Location of recipients:** EU and non-EU

**Safeguards for transfer to third countries:** Standard Contractual Clauses (SCC) of the EU

## h. Employee development and career planning

The career development of our employees is important to us. We therefore conduct regular performance appraisals with you, ask you about your development wishes, offer you further training at our expense and accompany you on your career path.

**Processed data categories:** Master data (first name, last name); company contact data (e-mail address); career data (current position, performance appraisals, aspirations and goals, participation in further training and corresponding certificates)

**Purpose of processing:** Performance assessment and management, career development of our employees

**Source of the data:** We collect this data directly from you. We may receive your performance appraisal from third parties (colleagues, superiors, engagement managers)

**Obligation to provide the data:** There is neither a legal nor a contractual obligation to provide this data. However, partial or non-provision of this data may mean that we are unable to support you in your career or are less able to do so.

**Legal basis:** We process this data based on our legitimate interest in the development of our employees in accordance with Art. 6 para. 1 lit f. GDPR

**Retention period:** We retain this personal data about you for the duration of the employment relationship. If the employment relationship ends, we limit their processing to the purpose of fulfilling our retention obligations.

**Recipient category:** Software providers, cloud storage providers

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

#### **i. Anniversaries and promotions**

As a company, it is important to us to appropriately recognize and celebrate the achievements and successes of our employees. Therefore, we would like to jointly announce the special milestones and promotions within our team to show our appreciation for the hard work and dedication of our employees.

**Processed data categories:** Master data (first name, last name); professional data (position in our company); professional photo (if voluntarily provided by you); career data (anniversaries, promotions); bonus data (information about the chosen or granted bonus for the anniversary or promotion, if such is provided for under company policy)

**Purpose of processing:** Employee retention

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** There is neither a legal nor a contractual obligation to provide this data.

**Legal basis:** The processing is based on our legitimate interest in accordance with Art. 6 para. 1 lit f. GDPR. Our legitimate interest in the processing is the recognition and appreciation of your performance, the resulting employee loyalty and transparency towards all employees.

**Retention period:** Storage for the purpose of communicating anniversaries and promotions is only temporary until the end of the communication.

**Recipient category:** Software provider, cloud storage provider

**Location of recipients:** EU and non-EU



**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

#### **j. Preventive healthcare and occupational health management**

We have introduced a company health management system to maintain and improve the well-being and health of our employees. In addition to offering free seminars, training courses and live dialogues with experts, this also consists of providing contact with our company doctor, the provision of computer glasses, height-adjustable desks in the offices or other medically useful or necessary workplace equipment and the "Employee Assistance Program", where you can speak to experts on a variety of topics confidentially and free of charge. We use external providers for our occupational health management in order to enable you to communicate confidentially. We will only be aware of your use of the program for auditing purposes (only for computer glasses). However, your personal data must be processed in order to be able to provide you with training courses and workplace equipment.

**Processed data categories:** Master data (first name, last name); company contact data (email address, phone number, assigned office); health data (need for VDU glasses or other workplace equipment - necessity only, no test results or other details), billing data

**Purpose of processing:** Provision of occupational health management and to maintain and improve the well-being and health of our employees

**Source of the data:** We collect this data directly from you. We collect the use of VDU glasses from the provider and/or issuer of the invoice.

**Obligation to provide the data:** There is neither a legal nor a contractual obligation to provide this data. However, please note that if you only provide part of your data or do not provide it at all, you may not be able to use all of the company health management services.

**Legal basis:** The processing is carried out for the execution of the contract in accordance with Art. 6 para. 1 lit b. GDPR and with regard to the VDU workstation glasses and other workplace equipment necessary for health reasons in accordance with Art. 9 para. 2 lit b. GDPR in conjunction with Section 3 of the Occupational Health and Safety Act. We process your invoice data on the basis of our legitimate interest in accordance with Art. 6 para. 1 lit f. GDPR. Our legitimate interest is invoice verification.

**Retention period:** The data is retained for the duration of the use of the respective offer for which we process personal data about you and limit the data processing after the end of the program to the purpose of fulfilling retention obligations. The invoice for your computer glasses will be deleted after internal review or approval.

**Recipient category:** Software providers, cloud storage providers

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

#### **k. Company integration management (BEM)**

In accordance with Section 167 of the ninth book of the German Social Code (SGB IX), as an employer we are obliged to set up a company integration management program (BEM). Participation in this program is voluntary for employees and only takes place with the prior consent of the person concerned. If specific personal data is deemed helpful during the course of the program and is to be processed, this will only take place with the express consent of the person concerned. The persons responsible for BEM have committed themselves to confidentiality by means of a written declaration. If you are entitled to participate in the BEM, we will inform you again in detail before the start of the program.

**Processed data categories:** Master data (first name, surname); company contact data (e-mail address, telephone number, assigned office); if applicable, health data (diagnoses, medical opinions and recommendations, findings, interview protocols, therapy recommendations and therapy reports, personal assessments by persons involved)

**Purpose of processing:** Provision and implementation of company integration management.

**Source of the data:** We collect this data directly from you and, if you have given your consent and have released us from our duty of confidentiality, from the other persons specifically involved in your BEM.

**Obligation to provide the data:** There is neither a legal nor a contractual obligation to provide this data. However, partial provision or non-provision may have a negative impact on the outcome of the integration management process.

**Legal basis:** The processing of this data for the creation and dispatch of a BEM invitation is based on a legal obligation pursuant to Art. 6 para. 1 lit c. GDPR in conjunction with Section 167 para. 2 SGB IX and Article 9 para. 2 lit b. GDPR in conjunction with Art. 88 GDPR in conjunction with Section 26 para. 3 of the Federal Data Protection Act. The BEM is carried out after consent has been given on the basis of your consent in accordance with Art. 9 para. 2 lit a. GDPR.

**Retention period:** The data for the creation and dispatch of the BEM invitation is retained for 3 years for verification purposes, starting with the dispatch. The data collected during the BEM will be stored for the duration of the BEM procedure and deleted immediately after the withdrawal of consent or the termination of the BEM, if there are no retention obligations that oblige us to store the data beyond this period.

**Recipient category:** Rehabilitation facilities (only after you have given your consent)

**Location of the recipients:** EU

**Safeguards for data transfer to third countries:** -

### **I. Company pension scheme**

We offer our employees the opportunity to participate in a company pension scheme. The processing of personal data is necessary to provide this service. We use an insurance broker and an insurance company to provide this service, which collects the data from you without it becoming visible to us. If you participate, you will receive a dedicated privacy notice with further information from them.

**Processed data categories:** Master data (first name, last name); company contact data (e-mail address, telephone number, assigned office); participation data (participation/non-participation in the company pension scheme)

**Purpose of processing:** Provision of the company pension scheme

**Source of the data:** We collect this data directly from you. We receive data on your pension contract from our provider.

**Obligation to provide the data:** There is neither a legal nor a contractual obligation to provide this data. However, it is not possible to participate in the company pension plan if the data is only partially provided or not provided at all.

**Legal basis:** We process the data for the implementation of pre-contractual measures in accordance with Art. 6 para. 1 lit b. GDPR.

**Retention period:** The data is retained for the duration of participation in the company pension scheme, as well as beyond that limited to the fulfillment of our retention obligations.

**Recipient category:** Software providers, cloud storage providers, insurance brokers, insurance companies

**Location of recipients:** EU and non-EU

**Safeguards for transfer to third countries:** EU standard contractual clauses (SCC)

### **m. Occupational disability insurance**

We offer our employees the option of occupational disability insurance. The processing of personal data is necessary to provide this insurance. We use the services of an insurance broker and an insurance provider who collects the data from you without it being visible to us. If you participate,

you will receive a dedicated privacy notice with further information from them.

**Processed data categories:** Master data (first name, surname); company contact data (e-mail address, telephone number, assigned office); participation data (participation/non-participation in occupational disability insurance)

**Purpose of processing:** provision of occupational disability insurance

**Source of the data:** We generally collect this data directly from you. We receive data on your pension contract from our provider.

**Obligation to provide the data:** There is neither a legal nor a contractual obligation to provide this data. However, it is not possible to participate in the occupational disability insurance if the data is only partially provided or not provided at all.

**Legal basis:** We process the data to carry out pre-contractual measures in accordance with Art. 6 para. 1 lit. b) GDPR.

**Retention period:** The data is retained for the duration of participation in the occupational disability insurance, as well as beyond that limited to the fulfillment of statutory retention obligations.

**Recipient category:** Software providers, cloud storage providers, insurance brokers, insurance providers

**Location of recipients:** EU and non-EU

**Safeguards for data transfers to third countries:** EU standard contractual clauses (SCC)

## **n. Company life insurance**

We offer our leadership the option of company life insurance. The processing of personal data is necessary to provide this service. We use an insurance broker and an insurance company to provide this service, which collects the data from you without it becoming visible to us. If you participate, you will receive a dedicated privacy notice with further information from them.

**Processed data categories:** Master data (first name, surname); company contact data (e-mail address, telephone number); participation data (participation/non-participation in company life insurance)

**Purpose of processing:** Provision of company life insurance

**Source of the data:** We generally collect this data directly from you. We receive data on your insurance contract from our provider.

**Obligation to provide the data:** There is neither a legal nor a contractual obligation to provide this data. However, it is not possible to

participate in the occupational disability insurance if the data is only partially provided or not provided at all.

**Legal basis:** We process the data to carry out pre-contractual measures in accordance with Art. 6 para. 1 lit. b) GDPR.

**Retention period:** The data is retained for the duration of participation in the occupational life insurance, as well as beyond that limited to the fulfillment of statutory retention obligations.

**Recipient category:** Software providers, cloud storage providers, insurance brokers, insurance providers

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

#### **o. Provision of IT**

To enable you to do your work, we will provide you with IT, such as tablets, laptops, mobile devices and accessories, such as keyboards, mice or screens, as required, in accordance with our internal guidelines. The provision is documented.

**Processed data categories:** Master data (first name, surname); company contact data (e-mail address, telephone number, assigned office); device data (identifier and other details of the IT provided)

**Purpose of processing:** Provision of work equipment

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** The provision of this data is mandatory for the performance of the employment relationship.

**Legal basis:** We process this data for the performance of the employment relationship in accordance with Art. 6 para. 1 lit b. GDPR and our legitimate interest pursuant to Art. 6 para. 1 lit f. GDPR. Our legitimate interest lies in the inventory of our IT.

**Storage period:** We store this personal data from you for the duration of the employment relationship and beyond that limited to the fulfillment of our retention obligations.

**Recipient category:** none

**Location of recipients:** -

**Safeguards for data transfer to third countries:** -

## p. IT-Support

In order to keep you operational and to support you in the event of minor or major difficulties, we have set up an IT support team that you can contact via various channels.

**Processed data categories:** Master data (first name, last name); operational contact data (e-mail address, telephone number, assigned office); device data (identifier and other details about the IT provided); communication data (descriptions of the problem, as well as potential solutions)

**Purpose of processing:** Provision and implementation of IT support.

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** The processing of this data may be necessary to keep you operational and is therefore essential.

**Legal basis:** We process this data for the performance of the employment relationship in accordance with Art. 6 para. 1 lit b. GDPR and based on our legitimate interest pursuant to Art. 6 para. 1 lit. f. GDPR. Our legitimate interest is the functioning of our IT.

**Retention period:** We store this personal data from you for the duration of the employment relationship and beyond that limited to the fulfillment of our retention obligations.

**Recipient category:** Software provider, cloud storage provider

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

## q. IT security monitoring

To ensure the security of our IT, we have several systems in use that allow us to detect and rectify malfunctions and prevent attacks on our IT. You can find more detailed information on our intranet in a special data protection declaration for IT security.

**Processed data categories:** Device data (identifier, device name, other hardware details); technical data (IP address, network traffic, websites visited)

**Purpose of processing:** Maintaining our IT security

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** The processing of this data is absolutely necessary so that we can guarantee our IT security and thus

also comply with legal requirements. As an employee, you are contractually obliged to provide support.

**Legal basis:** We process this data due to our legal obligation to take appropriate data security precautions. The legal basis for this is Art. 6 para. 1 lit c. GDPR in conjunction with. Art. 32 GDPR.

**Retention period:** If no error or attack has been detected, your data will be retained in the active system for 30 days, in aggregated form for 90 days and then in an archive for 275 days and then deleted immediately.

**Recipient category:** Software providers, cloud storage providers

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

#### **r. Data protection and data security measures**

As an HR services company, the protection of personal data is very important to us. For this reason, we have set up a dedicated data protection management system, which we need your support in maintaining, updating and documenting. For example, you are the contact person for the systems and processes used or the contact person for suspected data protection incidents.

**Processed data categories:** Master data (first name, surname); operational contact data (e-mail address, telephone number, assigned office); communication data (reports, descriptions, descriptions of the relevant processes)

**Purpose of processing:** Establishing and maintaining a functioning and appropriate data protection management system and taking sanctions under labor law if we become aware of violations.

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** The processing of this data is mandatory so that we can fulfill our legal obligations as a data controller under data protection law. As an employee, you are contractually obliged to support us in this.

**Legal basis:** We collect this data for the performance of the employment relationship pursuant to Art. 6 para. 1 lit b. GDPR, as well as to fulfill our legal obligations pursuant to Art. 6 para. 1 lit c. in conjunction with. Art. 32 GDPR in conjunction with. Art. 5 para. 2 GDPR

**Retention period:** We retain your personal data for the duration of the employment relationship and beyond that for the duration of our retention obligations.

Recipient category: Software providers, cloud storage providers, authorities (if required by law)

Location of recipients: EU and non-EU

Safeguards for transfer to third countries: EU standard contractual clauses (SCC)

## **s. Emergency and crisis management**

During your recruitment process, we ask you to create a profile in our emergency and crisis warning system. The information stored in your profile is used to reach and inform you quickly in the event of an identified emergency or crisis, such as a fire in one of our office buildings or an attack warning, and to check your well-being. Any use for other purposes is excluded.

**Processed data categories:** Master data (first name, surname); company and private contact data (e-mail address, telephone number); location data (office building where you work)

**Purpose of processing:** Warning of any dangers and ensuring the well-being of the individual employee.

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** There is no legal or contractual obligation to provide this data. However, please note that your well-being is important to us and that we can only warn you of any dangers we become aware of if you provide this data.

**Legal basis:** We process this data based on our legitimate interest pursuant to Art. 6 para. 1 lit f. GDPR. Our legitimate interest is to issue warnings in emergencies and crisis situations.

**Retention period:** We retain this personal data about you for the duration of the employment relationship or until you exercise your objection, depending on which circumstance occurs first.

**Recipient category:** Software provider, cloud storage provider

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

## **t. Marketing material**

As part of our marketing activities, we may ask you to act as an ambassador for our company. This may involve using a photograph of you together with a short text for promotional purposes. This information may be published on various platforms such as social media, professional networks or on print media such as flyers. It can also be used in internal



mailings or the intranet for employee retention purposes. Participation is voluntary and there are no consequences if you do not wish to participate.

**Processed data categories:** Master data (first name, surname); publications (photos, a quote from you, your descriptions, your answers to short questions)

**Purpose of processing:** For external communication this is for marketing purposes, for internal communication for the purpose of employee retention

**Source of the data:** We collect this data directly from you,

**Obligation to provide the data:** There is no legal or contractual obligation to provide this data, and you will not face any consequences if you do not wish it to be processed.

**Legal basis:** We process this data based on the consent obtained from you in advance in accordance with Art. 6 para. 1 lit. a GDPR.

**Retention period:** We store your data until you withdraw your consent. Please note, however, that data published on the internet, especially on social media sites, is accessible to everyone. They can be downloaded, reproduced and published in other ways without us being aware of this or being able to prevent it.

**Recipient category:** Software providers, cloud storage providers, marketing agencies, media providers

**Location of recipients:** EU and non-EU

**Safeguards for transfer to third countries:** EU standard contractual clauses (SCC)

**Withdrawal of consent:** You can withdraw your consent to the processing of the personal data you provided when contacting us at any time in accordance with Art. 7 para. 3 GDPR. To do so, please contact: [privacy-emea@roberthalf.net](mailto:privacy-emea@roberthalf.net). The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

#### **u. Assertion of and defense against legal claims**

If necessary, we also process personal data to assert and/or defend against legal claims.

**Processed data categories:** All relevant personal data stored by us about you that is necessary for the assertion and/or defense against legal claims and may be processed for this purpose within the framework of legal requirements, i.e. is not subject to any prohibitions on processing.

**Purpose of processing:** Assertion and/or defense against legal claims.

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** There is neither a legal nor a contractual obligation to provide this data.

**Legal basis:** We process this data based on our legitimate interest in accordance with Art. 6 para. 1 lit f. GDPR. Our legitimate interest is the assertion and/or defense against legal claims.

**Retention period:** We store this data for as long as it is necessary for the assertion and/or defense against legal claims. As a rule, this is the case until the end of the three-year limitation period, starting at the end of the year in which the contractual relationship was terminated.

**Recipient category:** Software providers, cloud storage providers, law firms, authorities, courts

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU Standard contractual clauses (SCC)

## 2. Applicants

### a. Applying for jobs at Protiviti

If you would like to start a career at Protiviti, we look forward to receiving your application. You can send us your application documents via the link on our homepage. For applications by email/postal applications, we will refer you to our careers homepage and then delete your application.

**Processed data categories:** Master data (first name, surname, nationality); contact data (e-mail address, telephone number, if voluntarily provided by you); CV data (education, other qualifications, professional career, certificate of highest educational qualification); desired salary; existence of a residence and work permit in Germany; geographical job parameters (preferred Protiviti location, desired place of work); source through which the job advertisement was found.

**Purposes of processing:** Processing your application and carrying out and improving the application process

**Source of the data:** We collect this data from you.

**Obligation to provide the data:** There is no legal or contractual obligation to provide the data.

**Legal basis:** The processing is carried out to decide on the establishment of an employment relationship with you and to carry out pre-contractual measures in accordance with Art. 6 para. 1 lit. b. GDPR. Furthermore, we collect the source through which the job advertisement was found by you

based on our legitimate interest pursuant to Art. 6 para. 1 lit f. GDPR. Our legitimate interest lies in analyzing the reach of our job advertisements.

**Retention period:** We retain this data for the duration of the application process and, in the event of rejection, for a further 6 months after completion of the application process. If you are hired, your data will be transferred to your personnel file and stored there for the duration of the contract.

**Recipient category:** Software provider, cloud storage provider

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

## **b. Talent pool**

It may happen that we must turn you down in the application process for an internal position. If we consider your profile to be particularly interesting, we will ask you whether you would like to be included in our applicant pool (talent pool). This enables us to consider you directly for future positions. We will only include you after you have consented.

**Processed data categories:** The personal data provided by you as part of the application process

**Purpose of processing:** Inclusion in our applicant pool (talent pool) to consider your profile for future job advertisements

**Source of the data:** We collect this data directly from you

**Obligation to provide the data:** There is no legal or contractual obligation to provide this data. However, we cannot include you in our talent pool without this data and will delete your data in accordance with statutory retention periods.

**Legal basis:** We process this data on the basis of your consent in accordance with Art. 6 para. 1 lit a. GDPR. We only ask for your consent if we consider you to be eligible for the applicant pool (talent pool).

**Retention period:** We store your data for a period of one year, unless you revoke your consent in advance. If you are hired, your data will be transferred to your personnel file and stored there for the duration of the contract.

**Recipient category:** Software provider, cloud storage provider

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

**Withdrawal of consent:** You can withdraw your consent to the processing of the personal data you have provided as part of the application process at any time in accordance with Art. 7 para. 3 GDPR. To do so, please contact: [privacy-emea@protiviti.com](mailto:privacy-emea@protiviti.com).

### **c. Assertion of and defense against legal claims**

If necessary, we also process personal data to assert and/or defend against legal claims.

**Processed data categories:** All relevant personal data stored by us about you that is necessary for the assertion and/or defense against legal claims and may be processed for this purpose within the framework of legal requirements, i.e. is not subject to any prohibitions on processing.

**Purpose of processing:** Assertion and/or defense against legal claims.

**Source of the data:** We collect this data directly from you.

**Obligation to provide the data:** There is neither a legal nor a contractual obligation to provide this data.

**Legal basis:** We process this data based on our legitimate interest in accordance with Art. 6 para. 1 lit f. GDPR. Our legitimate interest is the assertion and/or defense against legal claims.

**Retention period:** We retain this data for as long as it is necessary for the assertion and/or defense against legal claims. As a rule, this is the case until the end of the three-year limitation period, starting at the end of the year in which the contractual relationship was terminated.

**Recipient category:** Software providers, cloud storage providers, law firms, authorities, courts

**Location of recipients:** EU and non-EU

**Safeguards for data transfer to third countries:** EU standard contractual clauses (SCC)

## **III. Recipients**

As a globally operating group, we carry out some activities centrally for certain regions or worldwide in sister companies (recognizable by the company names "Robert Half" and/or "Protiviti"). You can obtain further information about our group companies using the contact details provided at the beginning of this statement, provided you are authorized to receive this information. Personal data may be transferred to these group companies in order to ensure efficient and consistent business operations and to maintain appropriate control over our business activities. In some business areas, there are also matrix structures, which means that

superiors of our employees may be employed in other companies and may therefore obtain knowledge of personal data to ensure effective management and organization within the Group. In these cases, these group companies act as our processors under our instructions with regard to the processing of your personal data. We also use independent service providers who act as processors. These service providers include software providers, cloud providers, marketing agencies, financial service providers, subcontractors and technical support companies that are necessary for the fulfillment of our business purposes and help us to improve the quality of our services and offer innovative solutions. When working with these service providers, we bind them to data protection compliance by means of an order processing contract and do not allow them to process data for their own purposes. In addition, personal data may be passed on to independent controllers such as tax consultants, auditors, law firms, courts or authorities, insofar as this is permitted or we are legally obliged to do so in order to meet legal requirements, to ensure compliance and to assert or defend against legal claims. As part of our cooperation with processors and independent controllers, we attach great importance to compliance with the level of data protection in the European Union. For this purpose, these partners, if they are not already subject to EU data protection law, undertake to comply with EU data protection standards by means of the standard contractual clauses provided by the EU. Through this contractual agreement, we ensure that the transfer of personal data to third parties outside the EU or the European Economic Area is carried out in accordance with the strict requirements of EU data protection law. Further information on the transfer of your personal data can be found in this privacy policy under the individually listed processing purposes.

#### **IV. Data security**

We have put appropriate technical and organizational security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we restrict access to your personal data to those employees, agents, contractors and other third parties who have a business need to know and are legally authorized to use it. We have put in place procedures to deal with any suspected personal data breach and will notify you and the relevant regulator of a breach where we are legally required to do so.

#### **V. Your rights**

##### **1. Right to withdraw consent - Article 7 para. 3 GDPR**

If the processing is based on your consent, you can withdraw this consent at any time with effect for the future. This does not affect the lawfulness of the processing for the period prior to your withdrawal. Please note that

if you withdraw your consent, we will no longer be able to offer you certain services, such as sending you our newsletter.

## **2. Right of access to the data subject - Article 15 GDPR**

You have the right to request access at any time about how and which personal data we process about you. If you make such a request, you will also receive a copy of the personal data we have stored about you. If these copies contain confidential information or personal data of other data subjects, we will black them out accordingly or alternatively inform you which personal data is contained on these copies and for what purposes.

## **3. Right to rectification - Article 16 GDPR**

If the personal data we have stored about you is incorrect or incomplete, you have the right to request immediate rectification and/or completion at any time.

## **4. Right to erasure – Article 17 GDPR**

You have the right to request that we delete your personal data at any time. We will comply with this request immediately, unless we are subject to legal obligations that prohibit deletion at this time. This may be the case, for example, if we are obliged to store your data for a longer period for tax law reasons. If this applies to you, we will inform you of this upon your request for deletion, restrict processing for purposes other than storage and delete the data immediately after expiry of the statutory retention periods, without the need for any further request from you.

## **5. Right to restriction of processing – Article 18 GDPR**

In addition to the right to erasure, you also have the right to request that we restrict the processing of your personal data if

- You dispute that the personal data we have stored about you is correct until we have had the opportunity to verify the accuracy of the data.
- our processing of your personal data is unlawful, but you oppose the erasure of the personal data and request the restriction of their use instead.
- We no longer need your personal data, but you need it for the establishment, exercise or defense of legal claims, or
- you object to the processing in accordance with your right under Article 21 GDPR and it has not yet been determined whether our interests outweigh yours.

## **6. Right to data portability – Article 20 GDPR**

You have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format, insofar as this is technically feasible. In addition, you have the right to request that we transmit this data to another controller without hindrance from us.

## **7. Right to object – Article 21 GDPR**

You have the right to object under the conditions of Article 21 GDPR. You have the possibility to object to the processing based on Article 6 para. 1 lit. f. GDPR at any time for reasons arising from your particular situation. This also applies accordingly to profiling based on these provisions. The information as to whether processing is based on Article 6 para. 1 lit. f. GDPR can be found in the above descriptions of the processing operations.

## **8. Automated individual decision-making, including profiling – Article 22 GDPR**

According to Art. 22 GDPR, you have the right not to be subject to a decision based solely on automated processing - including profiling - which produces legal effects concerning you or similarly significantly affects you. However, we do not currently use such methods.

## **9. Right to lodge a complaint with a supervisory authority – Article 77 GDPR**

Independently of and in addition to the rights listed, you have the right to lodge a complaint with the supervisory authority if you believe that the processing of your personal data violates the GDPR. The following supervisory authority is responsible for us:

### **Der Hessische Beauftragte für Datenschutz und Informationsfreiheit**

Gustav-Stresemann-Ring 1, 65189 Wiesbaden

Postbox 31 63, 65021 Wiesbaden

Telephone: 0611-1408 0

Telefax: 0611-1408 611

E-Mail: [poststelle@datenschutz.hessen.de](mailto:poststelle@datenschutz.hessen.de)

Website: <https://datenschutz.hessen.de>

However, we ask you to give us the opportunity to discuss your concerns with you before making a complaint in order to find an uncomplicated and satisfactory solution for you. You can contact our data protection team at any time by emailing [privacy-emea@protiviti.com](mailto:privacy-emea@protiviti.com) or by contacting our external data protection officer using the contact details provided at the beginning of this policy.