

PRIVACY NOTICE

Regarding the Processing of Personal Data of Job Applicants

(Recruitment and Selection)

1. General information

SAG Management International AG, with registered office at **Erlenstrasse 4a, CH-6343 Rotkreuz** (hereinafter referred to as the “Company”, “we” or “us”), as a data controller, collects and processes personal data relating to job applicants and candidates in the context of recruitment and selection activities.

This Privacy Notice describes the manner in which the Company processes personal data of individuals who apply for vacant positions, are proposed for roles, or otherwise participate in recruitment and selection processes, whether such processes are carried out:

- for positions within the Company itself; or
- for positions within other companies belonging to the Swiss Automotive Group.

Where recruitment or selection activities are carried out for another Group company, that company will act as data controller alone or jointly with the Company, or the Company will act solely as processor, as applicable and as communicated during the recruitment process.

2. Purposes and legal bases of processing

The Company processes personal data of job applicants for **human resources and pre-employment purposes**, including to ensure compliance with applicable legal requirements, internal rules, and Group policies, as follows:

2.1. To carry out recruitment and selection activities

In particular, personal data is processed in order to:

- receive, register, and manage applications;

- assess professional qualifications, experience, competencies, and suitability for a specific position;
- organize and conduct interviews, tests, and assessments;
- communicate with candidates throughout the recruitment process;
- verify information provided by candidates, including by contacting referees or recruitment partners, where relevant and legally permitted;
- make recruitment and hiring decisions.

Legal basis:

Processing is necessary in order to take steps at the request of the data subject prior to entering into an employment or similar contract, in accordance with **Article 6(1)(b) GDPR**, as well as for the legitimate interests of the Company or the relevant Group company in conducting an effective and well-documented recruitment process, in accordance with **Article 6(1)(f) GDPR**.

2.2. Compliance with legal obligations

- Personal data may also be processed in order to comply with applicable labor, anti-discrimination, employment, and record-keeping obligations imposed by law.

Legal basis:

Processing is necessary for compliance with a legal obligation, in accordance with **Article 6(1)(c) GDPR**.

3. Categories of personal data processed

In the context of recruitment and selection, the Company may process, in particular, the following categories of personal data:

- identification and contact details;
- information contained in CVs, cover letters, and application forms;
- education, training, qualifications, professional experience, and language skills;
- interview records, assessment results, and internal evaluations;
- information obtained from references or recruitment agencies, where applicable;
- publicly available professional information, where relevant and legally permissible;

- any other personal data voluntarily provided by the candidate during the recruitment process.

Where required by law or justified by the nature of the position, the Company may also process data relating to background checks, integrity checks, or conflict-of-interest assessments.

4. Source of personal data

Personal data is collected primarily **directly from the candidate**.

In certain cases, personal data may also be obtained from:

- recruitment agencies or other HR service providers;
- referees indicated by the candidate;
- Group companies;
- publicly available professional sources, where permitted by law.

5. Disclosure of personal data

In order to fulfil the above-mentioned purposes and to the extent necessary to comply with legal obligations or to facilitate recruitment activities, the Company may disclose personal data to the following categories of recipients:

- authorized employees and managers of the Company involved in recruitment and selection;
- the relevant hiring company within the Group;
- other companies within the Group, where recruitment is organized at Group level;
- external service providers involved in recruitment (e.g. recruitment agencies, IT platform providers);
- competent public authorities, where disclosure is required by law.

All recipients are bound by confidentiality obligations and applicable data protection requirements.

6. Transfer of personal data

If necessary for recruitment purposes, personal data may be transferred to other companies within the Group or to service providers located within the European Economic Area or, where applicable, in third countries.

In such cases, the Company ensures that appropriate safeguards are in place, in accordance with applicable data protection legislation.

7. Duration of processing

Personal data processed in the context of recruitment and selection is stored **only for the period necessary** to achieve the purposes for which it was collected.

If the recruitment process results in employment, the relevant personal data will be further processed in accordance with the **Privacy Notice Regarding the Processing of Personal Data of Employees**.

If the candidate is not hired, personal data will be retained for a limited period after the completion of the recruitment process, in accordance with applicable legal requirements and internal retention rules, or deleted earlier where no longer necessary.

8. Automated decision-making

As a general rule, the Company does not use fully automated decision-making processes in recruitment and selection.

Where certain tools may involve automated elements (e.g. application management systems), decisions with legal or significant effects are not taken without human involvement, in accordance with applicable law.

9. Rights of data subjects

Job applicants benefit from the rights provided by applicable data protection legislation, including the right of access, rectification, erasure, restriction, objection, and data portability, under the conditions laid down by law.

Applications concerning the exercise of data subject rights may be addressed to the Company using the contact details below.