



Data Policy Workday Europe & South Africa

Career Site Logicalis



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1 Cloud-based Candidate Portal

On our career site, we use the application functionality of the software “Workday Human Capital Management (HCM)” of the company Workday Limited, The King’s Building, May Lane, Dublin 7, Ireland (<https://www.workday.com>) (“Workday”) provides HCM to us via their cloud solution (“Software-as-a-Service”). This means that Workday provides us with both the software for the HCM and the server structure for the use and storage of personal data and, consequently, personal data you provide as part of your application is stored in the public cloud of Workday, where we process it.

We agreed with Workday by way of contract that the processing of your personal data will be made within the European Union in the computing centres of Workday in Amsterdam and Dublin on an exclusive basis.

2 Collection, Processing and Use of Personal Data

2.1 Log Files

Whenever you access our career site, we collect data and information about you automatically when you use to visit the website.

In that process, the following data are collected:

- Information on the browser type and the version used
- The operating system of the user
- The internet service provider of the user
- The IP address of the user
- Date and time of access
- Websites from which the user’s system gets to our career site
- Websites accessed by the user’s system via our career site

Those data are also stored in the log files of our system. There will be no storage of those data together with other personal data of the user.

The legal basis for the temporary storage of the data is Art. 6 para. 1 lit. f GDPR (General Data Protection Regulation), DSGVO (Datenschutz-Grundverordnung), LOPDGDD (Ley Orgánica de Protección de Datos y Garantía de Derechos Digitales), POPI Act (Protection of Personal Information Act).

Storage is made to ensure the functionality of the website. Moreover, we use the data to optimise the website and to ensure the security of our information technology systems. In this connection, there will be no evaluation of the data for marketing purposes.

The aforesaid purposes are also the basis for our legitimate interest as defined in Art. 6 para. 1 lit. f GDPR, DSGVO, LOPDGDD, POPI.

The data will be erased once they are no longer required to accomplish the purpose of their collection. In the event of collection of the data for the provision of the website, this is the case once the respective session ends. In the event of storage of the data, this will be the case after 7 days, at the latest.

2.2 Application Portal

2.2.1 Registration

To send an application it is required that you open a user account and register on the application portal. The registration of a user account enables you to keep yourself informed of the status of your application and to access your previous application data you re-apply for another position with us, as we store the data you provided in your application in your user account.

By checking the box at the end of the application as well as the registration process, you give your consent to the collection and storage of your data. The legal basis for the processing in this respect is Art. 6 para. 1 lit. a GDPR, DSGVO, LOPDGDD, POPI.

The data remains stored until you or we cancel your registration. You have the opportunity to withdraw your consent to the collection and storage at any time by sending a message via email to the contacts referring to section 7 or by closing your user account on the application portal. In such a case, your user account will be deleted within 1 month after the receipt of your cancellation request, which automatically entails the discontinuation of application process and the erasure of any application documents provided. The withdrawal of your consent does not affect the lawfulness of the processing made on the basis of your consent until the point of withdrawal.

In case of misuse of the application portal, we reserve our right to block or delete user accounts at any time.

2.2.2 Application

On our career site, you may apply for jobs advertised on our application portal from time to time; your unsolicited application is also welcome. During the application process, we may collect the following information from you:

- Your name and contact details (i.e. address, home and mobile phone numbers, email address) and proof of address (where required);
- Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests;
- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;
- Information regarding your academic and professional qualifications;

As part of the application, you may as well provide us with documents such as your CV, copies of reports or other certificates by way of uploading them.

When you submit the application, the data entered in the input screen will be transmitted to us and stored in the public cloud of Workday for the processing of the application procedure, your application documents may be downloaded and/or printed for job interviews or other meetings, if applicable.

The provision of your personal data as part of an application is of a voluntary nature in principle, however some, is mandatory and must be provided to submit an application. We will inform you that incomplete data or missing documents may result in us not being able to consider your application. In such cases, we will erase your application as described in clause 2.2.7.

You will only be able to submit the data provided in the application process and any uploaded documents only when you have checked the box at the end of the application accepting our Data Protection Policy and giving your consent to the processing described in this Data Protection Policy.

We will typically collect and use this information for the following purposes (other purposes that may also apply are explained in our Data Protection Policy):

- to take steps to enter into a contract;
- for compliance with a legal obligation;
- for the purposes of our legitimate interests, including the prevention of the misuse of our systems and the need to ensure security for our information technology systems, or those of a relevant third party (such as a benefits provider), but only if these are not overridden by your interests, rights or freedoms;
- because it is necessary for carrying out obligations or exercising rights in employment law.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

2.2.3 Underage Candidates (e.g. Interns) (not for United Kingdom)

If underage candidates apply for a job we advertised, they will be requested after they entered their date of birth to download the document “Approval and Consent of the Natural/Legal Guardian”, which has to be filled in and signed by the natural/legal guardian and attached to the application additionally. Otherwise, we cannot consider the application of the underage candidate.

If the document “Approval and Consent of the Natural/Legal Guardian” is not filled in, signed and enclosed to the application of an underage candidate, the application procedure cannot be completed. If the uploaded document does not contain any valid approval and consent of the natural/legal guardian, the filed documents, the user account and all the stored data will be erased within one month.

2.2.4 Talent Pool, Retention of Data for up to Two Years

We reserve the right to include in our company-owned talent pool the applications of candidates to whom we cannot offer any adequate job for the time being, but with whom we would basically like to stay in touch to recruit them eventually, as the case may be. In the application process, you have the opportunity to answer “yes” or “no” to the question “Would you like to be included in our talent pool in the future?”. If you should agree to the inclusion, we will include you in our talent pool. If you say no, we will not consider you in this respect anymore. If you should not give your consent to the inclusion in the talent pool, it will have no impacts at all on your specific application. Moreover, if you agree, you also give us the permission to contact you by email during that time to send you information about our group of companies. Such information relates exclusively to current and/or new job offers, newly created jobs and/or departments, newly established company locations, as well as the growth of our group in general. In this connection, there will be no advertising of our products or services.

The legal basis for the inclusion in the talent pool as well as the sending of information by email is your consent pursuant to Art. 6 para. 1 lit. a GDPR, DGSVO, POPI and the legal base for Spain is Art. 6 LOPDGDD. The withdrawal of your consent will not affect the lawfulness of the processing made on the basis of your consent until the withdrawal.

If you agree to the inclusion in the talent pool, we will store and not erase you data for as long as we list you in our talent pool or until you inform us that you do not wish to take part in the talent pool any longer. If you have been included in the talent pool already and withdraw your consent prior to the lapse of two years, we will erase your application in the talent pool within one month as of the withdrawal. Apart from that, we erase your data in the talent pool upon the lapse of two years. Please consult our data policy for further details regarding erasure.

2.2.5 Application upon Referral by a Headhunter

Headhunters we contracted or cooperating with us have their own access to the application portal. There, they can store applications and/or upload documents for their clients. Following the storing of an application by a headhunter, the candidates will be informed of their rights as well as of the means and purposes of processing in an automatic email as defined in Art. 14 GDPR together with a link to this data policy. If you have not given your consent to the headhunter filing your application or if you do not wish this to occur, you can object to the storage of your data by sending an email to one of the contact referring to the section 7 at any time; this will entail the erasure of the application submitted by the headhunter as well as of the documents provided in this connection.

The legal bases of such processing are Art. 6 para. 1 lit. b GDPR, DSGVO, LOPDGDD, POPI.

2.2.6 Introduce Yourself Function

Through the "Introduce Yourself" function, we offer applicants the opportunity to apply on their own initiative if no suitable position has been advertised. To do this, the applicant must visit our careers page, where the "Introduce Yourself" function is integrated. Here, the applicant must provide us with data such as country, first name, last name, email, telephone number and a CV. By clicking the checkbox at the end of the application, you consent to the collection and storage of your data. The legal basis for the processing in this respect is Art. 6 para. 1 lit. a GDPR, DSGVO, LOPDGDD, POPI.

The data will be stored for two years -. You have the option to withdraw your consent to the collection and storage of your data at any time by sending an e-mail to one of the contacts mentioned under the point 9. In such a case, the data will be deleted within one month of your request for deletion, which automatically leads to the termination of the application process and the deletion of submitted application documents. The revocation of your consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

2.2.7 Retention of Applications / Erasure

2.2.7.1 Germany/ Channel Islands/ United Kingdom/ Ireland/ Spain/ South Africa/ Portugal

In the event of completion of the application procedure with a refusal by us or you, your applications, including your user account, will be erased one month after the date of refusal, except for applications of minor candidates for whom the consent and approval of the natural/legal guardian has not been delivered within 14 days of the receipt of the application, and except for inclusions of applications in the talent pool or a pool or a speculative application.

If the application procedure ends with the hiring of the candidate, your application documents will be included in the employee database as well as in the electronic and physical personnel file.

The erasure encompasses the electronic application documents that were printed and/or temporarily stored, as well as the ones stored in the cloud.

3 Cookies

On our career site, we use cookies, of which we inform the user when he/she views the website. Cookies are small text files, which are stored on the end device of the user when he/she views a website. Cookies are not harmful and contain information enabling the unequivocal identification of the browser when the website is viewed again and – based on such identification – showing the user a website adjusted in accordance with his/her surfing behaviour.

3.1 Session Cookies

To make your visit to our career site as attractive as possible, we use so-called session cookies. They contain a private ID storing the settings, uses and/or entries of a visitor for a follow-up session. The session cookies or the private IDs, respectively, and are used for the exclusive purpose of delivering a working and as attractive as possible website to the user.

The information collected by the cookies are not used to create any user profiles. You can delete cookies yourself and/or set your browser to inform you of the setting of cookies for you to decide in each case whether you accept them or not or exclude the acceptance of cookies in certain cases or on a general basis. If cookies are not accepted, the functionality of our website could be reduced.

4 TLS Encryption

The security of your personal data is important to us. Therefore, they are transferred using TLS encryption. TLS is the abbreviation for "Transport Layer Security". You can see whether a part of a website is encrypted or whether an encrypted transfer takes place when the address bar shows https://.

5 Rights of the Data Subject

In your relationship with us, you have the following rights relating to your personal data:

- Right of access to information,
- Right of rectification or erasure,
- Right to restriction of processing,
- Right to object to the processing,
- Right to data portability.

Moreover, you have the right to complain with a data protection supervisory authority about our processing of your personal data.

For questions about the collection, processing or use of your personal data, for the assertion of your rights or the withdrawal of given approvals, please contact our data protection officer, see in clause 7.

6 Modification of the Data Policy

We reserve the right to modify this data policy for the future. Any modification of this policy will be published in this website.

7 **Contact Data**

Germany:

For questions concerning the data protection provisions of our website in Germany, please contact our data protection officer at dsb@logicalis.de. For questions concerning your application, please send us an email to peoplematters@logicalis.de.

The Controller as defined in Art. 4 No. 7 GDPR (General Data Protection Regulation) is: Logicalis GmbH, Martin-Behaim-Strasse 19-21, 63263 Neu-Isenburg, Germany, tel: +49 (0) 6102 - 7786 – 0, fax: +49 (0) 6102 - 7786 – 980, email: info@logicalis.de, Managing Director: Christian Werner.

Spain:

For questions concerning the data protection provisions of our website in Spain, please contact our data protection officer at derechos.arco@es.logicalis.com. For questions concerning your application, please send us an email to seleccion@es.logicalis.com.

The Controller as defined in Art. 4 No. 7 GDPR (General Data Protection Regulation) is: Logicalis Spain, S.L.U, Avenida Diagonal (Ed L'illa Diagonal), 569 - Piso 2. Puerta 3, 08029, Barcelona, Managing Director Alex Zaragoza.

South Africa

For questions concerning the data protection provisions of our website in South Africa, please contact our lsadpo@za.logicalis.com.

The Controller is: Logicalis SA (Pty) Ltd, Johannesburg - Building 5, Grayston Office Park, 128 Peter Rd, Sandown, Sandton, 2196, South Africa, Managing Director Frikkie Groble.

Channel Islands:

For questions concerning the data protection provisions of our website in Channel Islands (Guernsey and Jersey), please contact our data.protection@gg.logicalis.com.

The Controller as defined in Art. 4 No. 7 GDPR (General Data Protection Regulation) is: Logicalis Guernsey Ltd, Pitronnerie Road St Peter Port GY1 2RF Guernsey, Managing Director Jonathan Crichard.

The Controller as defined in Art. 4 No. 7 GDPR (General Data Protection Regulation) is: Logicalis Jersey Ltd, Rue à la Dame, Five Oaks, Jersey JE2 7NH, Jersey, Managing Director Jonathan Crichard (each "Logicalis" and together, "Logicalis").

Ireland:

For questions concerning the data protection provisions of our website in Ireland, please contact our data.protection@ie.logicalis.com.

The Controller as defined in Art. 4 No. 7 GDPR (General Data Protection Regulation) is: Logicalis Solutions Limited Ireland and Logicalis Technology Limited Ireland, 62A Heather Road Dublin D18 CA37 CO DUBLIN, Country Manager Patrick Jordan.

United Kingdom

If you are based in the UK, we hope that our Logicalis UK data protection team who can be contacted by email at data.protection@uk.logicalis.com can resolve any query or concern you raise about our use of your information on this website. If not, you can contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

The Controller as defined in Art. 4 No. 7 GDPR (General Data Protection Regulation) is: Logicalis UK Limited, Ground Floor, Building 8, Foundation Park, Roxborough Way, Maidenhead, SL6 3UD, managing director: Alex Louth.

If you are unsure who to contact, please submit your request/query to contact dpo@logicalis.com and it will be forwarded as appropriate.

Logicalis International Limited

If you are unsure which entity applies to you, please submit your request/query to contact dpo@logicalis.com and it will be forwarded as appropriate.

The Controller as defined in Art. 4 No. 7 GDPR (General Data Protection Regulation) is: Logicalis International Limited, Ground Floor, Building 8, Foundation Park, Roxborough Way, Maidenhead, SL6 3UD, Managing Director: Robert Baillkoski.

Portugal:

For questions concerning the data protection provisions of our website in Portugal, please contact our data protection officer at contact duarte.rodriques@pt.logicalis.com. For questions concerning your application, please send us an email to recrutamento@pt.logicalis.com.

The Controller as defined in Art. 4 No. 7 GDPR (General Data Protection Regulation) is: Logicalis Portugal, Lagoas Park, Edif5, Torre A, Piso 5, 2740 Porto Salvo, Portugal, CEO João Martins.

8 Data Protection Officer

The data protection officer for Germany is: Ms Kerstin Wahl

The data protection officer for Logicalis Spain, S.L.U. Kevin Sastre Ruiz

The data protection officer for Logicalis International Limited is Leopoldo Dal Bianco

The data protection function for Logicalis UK is managed by the legal department.

The data protection officer for Logicalis Solutions Limited Ireland and Logicalis Technology Limited Ireland is Declan O'Connor.

The data protection officer for Logicalis South Africa is Patricia Adams

The data protection officer for Logicalis Guernsey and Logicalis Jersey is Alex Colias

The data protection officer for Logicalis Portugal is Duarte Rodrigues.

9 Revision History

Date	Version	Changes / Reason for Changes	Person
25.04.2019	1.0.0	Final Adjustments	Alen Bosnjak
06.11.2019	1.1.0	Deletion of the de.bewerbung e-mail and inclusion of Kerstin Wahl. Adaptation uniform process defined for the various cases of revocation.	Alen Bosnjak
17.11.2020	1.2.0	Change Logo. Delete the email de.hr@logicalis.de and change to peplematters@logicalis.de. Delete Section 6 LinkedIn as this is not in use anymore.	Alen Bosnjak
05.01.2021	1.3.0	4.2.6 Introduce Yourself function included and 4.2.7. extended by Initiative application.	Alen Bosnjak
25.11.2021	1.4.0	Revision of the policy and create an European policy. Update the clauses 2.2.4, 2.2.6, 2.2.7, 8., 9.	Alen Bosnjak
15.02.2022	1.5.0	Merged the section 8 Controller into section 7 Miscellaneous	Alen Bosnjak
24.03.2022	1.6.0	Section 3.2. Google Analytics deleted, adjust section 7 and section 8	Alen Bosnjak

Date	Version	Changes / Reason for Changes	Person
02.12.2022	1.7.0	Section 6 modified, section 7 renamed to "Contact Data"	Alen Bosnjak
07.03.2023	1.8.0	Final Corrections	Brian Samoto
11.05.2023	1.9.0	Add South Africa to section 7 section 8 and section 2.1	Alen Bosnjak
05.07.2023	1.10.0	Add Portugal to Sectopm 2.2.7.1, Section 7, Section 8	Alen Bosnjak

10 Document Owner and Approval

Verantwortlich	Kerstin Wahl/ Leopoldo Dal Bianco
Freigabe	Kerstin Wahl/ Leopoldo Dal Bianco
Version	1.10.0