

RIMOWA

Applicant Information on Data Processing in the Application Process

Data protection and the privacy of your personal data are very important for us. We comply with data protection legislation regulations and inform you hereinafter about the processing of your personal data in the application process.

1. Contact Details of the Data Controller:

The following entity is responsible for collecting your personal data in the application process:

RIMOWA GmbH
Richard-Byrd-Str. 13
50829 Cologne
represented by the manager
Telephone: +49 221 956-4170, email: hello[at]rimowa.com

You can contact our **data protection officer** at the above-mentioned address or by email at dataprotection[at]rimowa.com.

2. Purpose and Legal Basis of the Data Processing

We process personal data insofar as this is necessary for the decision on the justification of an employment relationship or after justification of the employment relationship for its implementation or termination or for exercising or fulfilling rights and obligations of the representative of the interests of the employee arising on the basis of a law or a collective bargaining agreement, an agreement between works council and employer or a works agreement (collective agreement). If you apply for a certain job and this job is already taken or we regard another job as just as suitable or even more suitable for you, we would like to forward your application within the company or to an affiliated company. Please notify us if you do not agree to your data being forwarded. Here the legal basis for processing or forwarding within the group is § 26, sub-section 1 in combination with sub-section 8, clause 2 of the German Federal Data Protection Act (BDSG), respectively Art 6 (1) lit. f) of the GDPR.

Furthermore, we can also process personal data relating to you, insofar as this is necessary for defending against legal claims from the application process enforced against us. Here the legal basis is Art. 6 (1), lit. f) of the GDPR, the legitimate interest is, for instance, a burden of proof in a process pursuant to the General Equal Treatment Act (AGG).

3. What Categories of Personal Data Do We Process?

We process data which is related to your application. These can be general personal data (such as name, address and contact data), information on your professional qualification and school education or information on your further education or other information which you provide us in connection with your application. Furthermore, we may process profession-related information which you have made publicly accessible, such as a profile in professional social media networks.



RIMOWA

4. What Categories of Data Recipients Are There?

Data transfer to other Group companies

We can transfer your personal data to companies affiliated with us, insofar as this is permissible within the framework of the purposes and legal bases presented under point 2. These are, in particular, the respective parent companies of the brand and the European HR headquarters of the brands. As a matter of principle, your data is not transferred to third parties outside the Group, unless we are obligated to do so by law, or forwarding of the data is necessary for implementing the application process or you have given your prior explicit consent to the forwarding of your data.

Data transmission to external service providers (contract processors)

Your data shall be forwarded to service partners, insofar as these support RIMOWA GmbH in providing their services, in particular if any possible host providers or any possible suppliers of applicant management systems are working on behalf of us and pursuant to Art. 28 of the GDPR. Insofar as our service providers come into contact with your personal data, we ensure that these service providers comply with the regulations of Data Protection Laws in exactly the same way.

Your personal data shall not be forwarded to a third country.

5. Term of Storage

We store your personal data as long as this is necessary for a decision to be made regarding your application. Insofar as no employment relationship is established between you and us, we may still continue storing data, insofar as this is necessary for protecting against possible legal claims. With respect to this, the application documents shall be deleted 6 months after announcement of the rejection decision, unless it is necessary to store them for a longer period of time because of legal disputes.

If we want to store your documents for additional vacancies, we shall notify you accordingly and obtain your consent. Your documents shall then be stored for two years after the end of the original application process.

6. Your Rights as a Data Subject

As an applicant seeking a job at our company, depending on the particular situation in individual cases, you will have the following data protection rights, and to exercise these you may contact our data protection officer at any time, using the contact information stipulated in point 1:

a. Information

You have the right to receive information from us free of charge at any time, as well as confirmation of the personal data about you which has been stored and a copy of these data.

b. Rectification

You have the right to rectification and/or completion, insofar as the processed personal data relating to you is incorrect or incomplete.



RIMOWA

c. Restriction of Processing

You have the right to demand restriction of the processing, if one of the following requirements is fulfilled:

- You contest the correctness of the personal data, namely for a length of time that enables us to check the personal data.
- The processing is illegal, and you reject the erasure of the personal data and instead demand restriction of the use of the personal data.
- We no longer require the personal data for the purposes of processing, but you require them for exercising or defending of legal rights.
- You have objected to the processing pursuant to Art. 21 (1) of the GDPR and it is not yet certain whether our legitimate rights outweigh your legitimate rights.

d. Erasure:

You have the right to have the personal data related to you immediately erased, insofar as one of the following reasons applies and insofar as the processing is not necessary:

- The personal data was collected for such purposes or processed in any other way, for which they are no longer necessary.
- You revoke your consent, upon which the processing is based, and there is no other legal basis for the processing.
- You object to the processing pursuant to Art. 21 (1) of the GDPR and there are no paramount legitimate reasons for the processing, or you object to the processing pursuant to Art. 21 (2) of the GDPR.
- The personal data was illegally processed.
- The erasure of the personal data is necessary for fulfilling a legal obligation pursuant to Union or Member State law, which we are subject to.
- The personal data was collected with regard to the offer of information society services pursuant to Art. 8 (1) of the GDPR.

e. Data Portability:

You have the right to receive the personal data which concerns you, which you have provided to us, in a structured, commonly used and machine-readable format. Furthermore, you have the right to transmit those data to another controller without hindrance by us. In exercising this right to data portability, you also have the right to have the affected personal data transmitted directly from us to another controller, insofar as this is technically feasible. Freedoms and rights of other persons are not allowed to be adversely affected.

f. Right to Object

Insofar as the personal data relating to you is processed pursuant to Art. 6 (1) f of the GDPR, you shall have the right, on grounds relating to your particular situation, at any time to object to the processing of these data. We shall then no longer process these personal data, unless we can prove compelling reasons for the processing, which outweigh your interests, rights and freedoms, or if the processing serves the enforcement, exercising or defending of legal rights.

g. Withdrawing Consent

If the processing is based on consent, you shall have the right to withdraw your consent at any time, without this affecting the legality of the processing which has been performed



RIMOWA

before your consent was withdrawn. For this purpose, you may contact our data protection officer at any time using the contact details stipulated under point 1.

For exercising your rights please always contact the above-mentioned controllers, because your rights also need to be maintained there. However, you can also contact the data protection officer (see above), particularly if your matter requires greater confidentiality.

If you withdraw your consent, the legality of the processing that has been performed until this consent is withdrawn shall remain unaffected.

7. Right of Complaint to the Supervisory Authority

You shall have a right to complain to the responsible supervisory authority (Landesbeauftragte/r für Datenschutz und Informationsfreiheit Nordrhein-Westfalen [State Data Protection and Freedom-of-Information Officer], Kavalleriestr. 4, 40213 Düsseldorf, Telephone + 49 211 - 38 424 - 0.).

8. Basis for Providing Your Data

It is necessary for you to provide us with information for the possible conclusion of a contract.

You are not legally or contractually obliged to provide us with your data. However, since we require personal information about you for our application assessment process, the possible consequence of failure to provide such information is that we shall not be able to sufficiently take you into consideration as an applicant.

9. No Automated Decision Making

No automated individual decision shall be made in the sense of Art. 22 of the GDPR, which means that the decision on your application shall not be based on automated processing.

As at: February 2019

