



**BOSCH**

Tecnología para a vida

## Data protection notice for the applicant management process at Bosch Group

### We want you in our team

In this privacy notice, we inform you how your personal data is processed in the applicant management process at Bosch Group (in the following also “Bosch” or “we”/”us”). Additionally, we inform you about your rights under applicable data privacy laws.

### Bosch respects your privacy

Protecting your personal data and ensuring the security of all our business data are important concerns for us. We always consider these concerns in our business processes. The personal data collected when you apply online is treated confidentially and strictly in accordance with the statutory provisions.

Data privacy and information security are an integral part of our corporate policy.

### Controller

The controller of your personal data will be the legal entity within the Bosch Group to whom you send your candidature or, as the case may be, the legal entities of the Bosch Group that publish the same advertisement for an available position.

You will find the contact details of the controller in the job advertisement in the application management system.

### Data categories processed

The following are the main categories of personal data processed:

- Master data (e.g., name, date of birth, nationality, place of residence)
- Documents (e.g., references, certificates, résumés, health related documents)
- Education and training details (e.g., data on primary/secondary/university education, professional qualifications)
- Payment data (e.g., bank account details for travel expenses)
- Organizational data in case of international applications (for example: personnel number, costcenter, department)
- Communication data (e.g., e-mail address, (cell) phone number, IT user ID in case of internal applications)
- Audio-visual recording in the selection processes (e.g., for the Juniors Manager Program -JMP)
- Log data recorded while using IT systems

These may also include the processing of special categories of personal data such, as per art.9 section 1 GDPR, such as health data or union membership.



## Purposes of processing and legal bases

We process your personal data in compliance with the EU's General Data Protection Regulation (GDPR) with the national data protection laws and with any other applicable national laws.

The personal data processing takes place during the applicant management process particularly for the purpose of preparation for an employment relationship with a legal entity of the Bosch Group.

The main legal basis for this purpose is the art. 6.1.b) GDPR together with national data protection laws ("in order to take steps at the request of the data subject prior to entering into a working contract").

Other legal bases are:

- Art. 6.1.a) GDPR (consent) in conjunction with the respective national data protection law: e.g., for Bosch applicant community as part of the applicant management system
- Art. 6.1.f) GDPR (legitimate interest). We will always gently balance our legitimate interests in the organization of our business (e.g., HR evaluations like personal controlling, analytical reports) against your interest in protecting your personal data in accordance with statutory provisions.

Whenever special categories of personal data are processed as per article 9, section 1 of the GDPR in conjunction with the respective national data protection laws (for example, health data, trade union membership), this processing is conducted on the legal basis of art. 9.2.b) of the GDPR in conjunction with the respective national data protection law. Furthermore, it may be necessary to process your health data in order to assess your ability to work in accordance with Art. 9 para. 2(h) 1 GDPR in conjunction with the respective national data protection law.

## Children

This applicant management platform is not meant for children under 16 years of age.

## Collecting of personal data

As a rule, your personal data is collected directly from you during the hiring process.

The easiest way to apply for a job at Bosch is a direct application for a position advertised on one of our job portals, where you enter your data in the candidate profile created individually for the advertised position. You, hereby, have the possibility to send us the data by connecting to a social network, by a manual input and/or by using "CV Parsing" (transferring some data from your CV to our job portal).

The data from paper applications is transferred manually to the application system. You receive an email in order for you to activate your manually created application. In this email, we inform you, whether we will send your paper application back or shred it. If you do not



activate your application within 30 days, your data is deleted from our applicant management system, and you will not be considered any further in the selection process.

Additionally, you have the possibility to be referred by a Bosch Group employee. For this purpose, you need to give your application documents to this employee, who then uploads it in the application management system. You receive an email with which you can activate your application. If you do not activate your application within 30 days, your data is deleted from our applicant management system, and you will no longer be considered any further in the selection process. Your application is linked with the employee who uploaded it in the application system. This helps us in identifying that this employee has referred you. Furthermore, this employee can track the status of your application (invitation, rejection, etc.) on an overview page but has no access to the details of the application process.

We keep you up to date on the status of your application via email.

During the application process, we will ask you whether we are allowed to forward your application data to other suitable open positions. If applicable, we may also offer you membership in a Bosch applicant community.

Staffing of particularly sensitive job positions may require a further check of your application data on your career path. The result of this check is documented in the application management system. We inform you about such checks in a transparent manner in the framework of our job advertisements. This takes check place taking local legal requirements into consideration and by involving carefully selected service providers.

### Belong to a Bosch community of candidates

If you become a member of one of our invitation-only candidate communities, you have the option of personally publishing your details, including all applications in the respective country, to all staff members of the personnel department of the Bosch Group in the country in question. By becoming a member of the community, you agree to be informed, by e-mail or telephone, of positions and events that we think may be of interest to you. You can withdraw your consent at any time with effect for the future by contacting [SupportDeutschland.HRIT@de.bosch.com](mailto:SupportDeutschland.HRIT@de.bosch.com). The invitation to join a Bosch candidate community may take the form of an advertisement but includes a clear instruction that it refers to a candidate community.

### Participation in Bosch recruiting events

Some Bosch locations organize Recruiting-Events in order to win potential candidates for multiple, similar job advertisement. Special events pages in different internet platforms inform about the contents of these events. You may apply for participation in these events by uploading your application in our application system via the link created for this purpose.

### Recipients of your personal data

- Within a legal entity of the Bosch Group

Only the people involved in the application process (e.g., line managers and associates of the recruiting department, HR associates and associate representatives) have access to your

personal data for the purposes mentioned above within the legal entity of the Bosch Group to which you have applied.

- Other legal entities within the Bosch Group

Other legal entities are data controllers themselves. The above-mentioned persons involved in the recruiting process may belong to different companies of the Bosch Group. Therefore, your data may be transferred to the respective persons worldwide within the Bosch Group.

In case of your appointment, your data is transferred from our application management system to our HR-administration systems. In this process, your data may be transferred to a different legal entity and will thereafter be processed as employee data. An exchange of your personal data with other legal entities within the Bosch Group takes place especially in order to fulfil the contracts as well as due to our legitimate interest to organize the internal workflows (e.g., Shared Services, execution of transfers or relocation across legal entities).

- Recipients outside of the Bosch Group

We may disclose your personal data to other data controller only, if necessary, for the application, if the third party or we have a legitimate interest in this disclosure, or if you have provided your consent. You will find the details of the legal bases in the section “Purposes of processing and legal bases.”

- Data processors

In addition, we use service providers to fulfil our contractual and legal obligations, among other things. As far as these service providers’ processes personal data on our behalf, we have concluded the contracts required under data protection law with them.

We select our service providers carefully and monitor them on a regular basis, especially regarding their diligent handling and protection of the data that they store and process. All service providers are obliged to maintain confidentiality and to comply with the statutory provisions. Service providers may also be other companies of the Bosch Group.

You will find a list of our contractors and service providers (with whom we have a long-term or ongoing business relationship) in Annex 1.

## Transfer to recipients outside the EEA

We might transfer personal data recipients outside of the European Economic Area (EEA). In such case prior to the transfer, we ensure that either the respective country provides an appropriate level of data protection due to a decision of adequacy by the European Commission, or due to other appropriate safeguards (e.g., binding corporate rules on data protection or EU standard contractual clauses), or a legal basis authorises the transfer.

You are entitled to receive an overview of third country recipients and a copy of the specifically agreed provisions securing an appropriate level of data protection. For this purpose, please contact the Controller mentioned above.



Should a transfer to recipients outside the European Economic Area (e.g., authorities, courts, parties of a lawsuit or advisors) be necessary for the enforcement/exercise of or defence against legal claims, this shall be done in accordance with Art. 49 para. 1 e) GDPR.

## Duration of storage

We delete your personal data as soon as it is no longer required for the above-mentioned purposes, or we no longer have any legitimate interest in its retention. Your personal information will be stored for as long as we are legally required to.

Your personal data is stored if we are legally obliged to do so under applicable national law.

After the selection process is finished (e.g., because your application has been rejected for the process or due to revocation of your consent) we will delete your data after the legally established time has elapsed.

## Cookies

### Categories

We distinguish between cookies that are mandatorily required for the technical functions of the online service and such cookies and tracking mechanisms that are not mandatorily required for the technical function of the online service.

It is possible to use the online service without any cookies that serve non-technical purposes.

### Technically required cookies

By technically required cookies we mean cookies without those the technical provision of the online service cannot be ensured. These include e.g., cookies that store data to ensure smooth reproduction of video or audio footage.

Such cookies will be deleted when you leave the website.

### Marketing cookies and tracking mechanisms

#### General

By using marketing cookies and tracking mechanisms we and our partners are able to show you offerings based on your interests, resulting from an analysis of your user behaviour:

#### - Statistics:

By using statistical tools, we measure e.g., the number of your page views.

#### - Conversion tracking:

Our conversion tracking partners place a cookie on your computer ("conversion cookie") if you accessed our website via an advertisement of the respective partner. Normally these cookies are no longer valid after 30 days. If you visit certain pages of our website and the cookie has not yet expired, we and the relevant conversion partner can recognize that a certain user clicked on the advertisement and thereby was redirected to our website. This can also be done across multiple devices. The information obtained by means of the conversion cookie serves the purpose of compiling conversion statistics and recording the total number of users who clicked on the respective advertisement and were redirected to a website with a conversion tracking tag.



- Social plugins:

Some of the pages of our online service involve content and services of other providers (e.g., Facebook, Twitter) which also may use cookies and active modules.

- Retargeting:

These tools create user profiles by means of advertising cookies or third-party advertising cookies so called "web beacons" (invisible graphics that are also called pixels or tracking pixels), or by means of comparable technologies. These are used for interest-based advertising and to control the frequency with which the user looks at certain advertisements. The relevant provider is the controller responsible for the processing of data in connection with the tool. The providers of the tools might disclose information also to third parties for the purposes mentioned above. Please note the data protection notices of the relevant provider in this context.

Please note that using the tools might include transfer of your data to recipients outside of the EEA where there is no adequate level of data protection pursuant to the GDPR (e.g., the USA). For more details in this respect please refer to the following description of the individual marketing tools:

#### Google Analytics

Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

Function: Analyse user behaviour (page views, number of visitors and visits, downloads), create pseudonymous user profiles based on cross-device information of logged-in Google users (cross-device tracking), enrich pseudonymous user data with target group-specific information provided by Google, retargeting, UX testing, conversion tracking and retargeting.

#### Google Tag Manager

Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

Function: Management of website tags via an interface, integration of program codes on our websites

## Security

Our employees and the companies providing services on our behalf are obliged to confidentiality and to compliance with the applicable data protection laws. We take all necessary technical and organizational measures to ensure an appropriate level of security and to protect your personal data particularly from the risks of unintended or unlawful destruction, manipulation, loss, alteration or unauthorized disclosure or unauthorized third parties. We are constantly trying to improve our security measures and keep them state of the art.

## Your rights

To enforce your rights, please use the details provided in the Contact section. Please, make sure that we can unambiguously identify you.

- **Right to information and access:** you have the right to obtain confirmation from us about whether or not your personal data is being processed, and, if this is the case, access to your personal data.





- **Right to correction and deletion:** you have the right to obtain the rectification or inaccurate personal data. As far as statutory requirements are fulfilled, you have the right to obtain the completion or deletion of your data. This does not apply to data which is necessary for billing or accounting purposes, or which is subject to a statutory retention period. If access to such data is not required, however, its processing is restricted (see the following).
- **Restriction of processing:** if the legal requirements are fulfilled, you can demand that we restrict the processing of your data.
- **Data portability:** if the legal requirements are fulfilled, you may request to receive data that you have made available to us in a structured, common and machine-readable format or - if technically feasible - to request that the data be transmitted to a third party.
- **Objection to data processing based on the legal basis of “legitimate interest”:** you have the right to object to the processing of your personal data at any time, as far as this is based on legitimate interest. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements, which override your rights.
- **Withdrawal of consent:** in case you consented to the processing of your data, you have the right to revoke this consent at any time with effect for the future. The lawfulness of data processing prior to your withdrawal remains unchanged.

## Right to complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority. You can appeal to the supervisory authority, which is responsible for your place of residence or your state of residency, or to the supervisory authority responsible for us. This is:

Comissão Nacional de Proteção de Dados

Av. D. Carlos I, 134 - 1.º

1200-651 Lisboa / Portugal

Tel: +351 213928400 / Fax: +351 213976832 / e-mail: [geral@cnpd.pt](mailto:geral@cnpd.pt)

[www.cnpd.pt](http://www.cnpd.pt)

## Adjustments to the Data Protection Notice

We reserve the right to adjust our security and data protection measures. In such cases, we will amend our data protection notice accordingly. Please, therefore, notice the current version of our data protection notice in the job advertisement.

## Contact

If you wish to contact us, please find us at the address stated in the "Controller" section.

To assert your rights, please, use the following link: <https://request.privacy-bosch.com/>.

To notify data protection incidents, please, use the following link: <https://www.bkms-system.net/bosch-datenschutz>.

For suggestions and complaints regarding the processing of your personal data we recommend that you contact our data protection officer:



Data Protection Officer  
 Information Security and Privacy (C/ISP)  
 Robert Bosch GmbH  
 P.O. Box 30 02 20  
 70442 Stuttgart (Germany)  
 Mailto: [dpo@bosch.com](mailto:dpo@bosch.com)

**Annex 1**

Service providers	Type of processing
SmartRecruiters GmbH Dircksenstrasse 47 10178 Berlin, Germany SmartRecruiters SP. Z o.o. Fabryczna 20, 31-553 Kraków, Poland SmartRecruiters Inc. 225 Bush Street, San Francisco, CA 94104, USA	Provision and ongoing development of the cloud platform (Software as a Service) for the above-mentioned processing. Processing of personal data provided.
Signum GmbH Rungestrasse 19 10179 Berlin, Germany	Processing of personal data for background checks.
Amazon Web Services Inc. 10 Terry Avenue North Seattle, WA 98109-5210, USA	Provision and operation of the technical infrastructure for the cloud platform (Platform as a Service).
Mailgun Technologies, Inc. 112 East Pecan Street Suite 1135 San Antonio, TX 78205, USA	Processing of e-mail communications between BOSCH and the applicant.
Text Kernel BV Nieuwendammerkade 28A17 Amsterdam, Noord-Holland 1022 AB The Netherlands	Provision, operation and ongoing development of a CV parsing application.
Randstad II, Prestação de Serviços, Lda	Processing of personal data for curricular screening
Bosch Security Systems – Sistemas de Segurança S. A	Processing of personal data for curricular screening

**Information on joint controllership towards data subjects  
 according to Art. 26 para. 2 sentence 2 GDPR**

**Bosch Car Multimedia Portugal, S.A.**

Rua Max Grundig, 35 – Lomar 4705-820 Braga, Portugal

**Robert Bosch, S.A.**

Av. Infante D. Henrique, Lote 2E-3E 1800-220 Lisboa

**Bosch Security Systems, Sistemas de Segurança S.A.**

Estrada Nacional 109/IC 1 – Zona Industrial de Ovar





Pardala 3880 – 728 S. Joao - Portugal

**Bosch Termotecnologia, S.A.**

Estrada Nacional 16, km 3.7 – Cacia 3800-533 Aveiro

**What is the reason for the joint controllership?**

Within “Employer Branding Iberia” the above-named parties shall cooperate closely. This also applies to the processing of your personal data. The parties have jointly determined the order in which this data will be processed at each stage of the process. They are therefore considered joint controllers for the protection of your personal data within the process stages described below (Art. 26 GDPR).

As a data subject within the meaning of the GDPR, you are entitled to the following information from the parties.

**For which process stages is there joint controllership?**

Recording of data processing activities in the context of projects under joint responsibility (Art. 26 GDPR) – Processing Description

## Information on the data processing

## Basic information

Name of the data processing	Employer Branding Program
Controllers & contact persons	<p><b>Bosch Security Systems, Sistemas de Segurança S.A.</b> Estrada Nacional 109/IC 1 – Zona Industrial de Ovar Pardala 3880 – 728 S. Joao – Portugal Contact person: OvrP/HRL</p> <p><b>Bosch Termotecnologia, S.A.</b> Estrada Nacional 16, km 3.7 – Cacia, 3800-533 Aveiro Contact person: HC/HRL-PO</p> <p><b>Robert Bosch, S.A.</b> Av. Infante D. Henrique, Lote 2E-3E, 1800-220 Lisboa Contact person: HRL-Lis</p> <p><b>Bosch Car Multimedia Portugal, S.A.</b> Rua Max Grundig, 35 – Lomar, 4705-820 Braga, Portugal Contact person: BrgP/HRL</p>
Description	Processing of the personal data of the curriculum received, select together the personnel who will fill the different vacancies, programmes/activities in all the legal entities mentioned.
Data flow	The Jointcontrollers receive the personal data through SmartRecruiters and decide jointly on the purpose of the processing of these personal data.
What are the purposes of the data processing?	Management of application Personnel Management

## Data subjects and affected data types

Which data subjects are affected by the data processing?	Applicants
Which data types are affected by the data processing?	<input checked="" type="checkbox"/> personal details (incl. photos) <input checked="" type="checkbox"/> communication data (address, telephone..)



	<input checked="" type="checkbox"/> data on education and training <input checked="" type="checkbox"/> data on employment relationships
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**How is personal data processed?**

How is the personal data processed technically?	Personal data is processed through the SmartRecruiters recruitment system.
Is personal data transferred to or processed in a state outside the EU as part of the data processing?	No transfer of data outside the EU

**Processors**

<b>Processors</b>	<b>Contractual Relationship</b>
Please name all processors within this data processing.	Data processing agreement with: Randstad II, Prestação de Serviços, Lda Bosch Security Systems - Sistemas de Segurança, SA

**What did the parties agree upon?**

As part of their joint controllership under data protection law, the above-mentioned parties have agreed which of them will fulfil the respective obligations under the GDPR. This applies in particular to the exercise of the rights of the data subjects (Art. 15 - 21 GDPR) and the fulfilment of the information duties pursuant to art. 13 and 14 GDPR.

This agreement is necessary because “Boost Career Acceleration Program” processes personal data in different process sections and systems operated by either Robert Bosch, S.A., Bosch Termotecnologia, S.A., Bosch Car Multimedia Portugal, S.A., or Bosch Security Systems - Sistemas de Segurança, S.A.

Processing activity:	Fulfilment of duties by:
Processing personal data from the CVs received to jointly select candidates who will participate in recruitment processes and Employer Branding activities	<b>Bosch Security Systems, Sistemas de Segurança S.A.</b> Estrada Nacional 109/IC 1 – Zona Industrial de Pardala 3880 – 728 S. Joao – Portugal Contato: OvrP/HRL <b>Bosch Termotecnologia, S.A.</b> Estrada Nacional 16, km 3.7 – Cacia, 3800-533 Aveiro Contato: HC/HRL-PO <b>Robert Bosch, S.A.</b> Av. Infante D. Henrique, Lote 2E-3E, 1800-220 Lisboa Contato: HRL-Lis <b>Bosch Car Multimedia Portugal, S.A.</b> Rua Max Grundig, 35 – Lomar, 4705-820 Braga, Portugal Contato: BrgP/HRL

**What does this mean for you as a data subject?**

Even if there is a joint controllership, the parties fulfil the data protection obligations according to their respective responsibilities for the individual processing activities as follows:

- Within the joint controllership:



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- All legal Bosch Legal Entities mentioned above and acting as joint controllers are responsible for analyzing the personal data in your curriculum for the purposes of deciding in a jointly matter in which legal entity you will cover the vacancy or start the program/activity if selected.
- Robert Bosch, S.A., Bosch Termotecnologia, S.A., Bosch Car Multimedia Portugal, S.A., or Bosch Security Systems - Sistemas de Segurança, S.A. shall make the information required under articles 13 and 14 GDPR available to the data subjects in a precise, transparent, comprehensible and easily accessible form in clear and simple language and free of charge. Each party shall provide the other party with all necessary information from its sphere of activity.
- The parties shall inform each other immediately of any legal positions asserted by you as a data subject. They shall provide each other with all information necessary to respond to requests for information.
- As a data subject, you will always receive the information from Robert Bosch, S.A., Bosch Termotecnologia, S.A., Bosch Car Multimedia Portugal, S.A., or Bosch Security Systems - Sistemas de Segurança, S.A. irrespective of this internal regulation, you can assert your rights against any party directly.

### Effective date

05.2023