

Siemens Data Privacy Notice - Job Market & Application Portal

We believe that protecting the security and privacy of your personal data is important. This Privacy Notice explains how we collect, store, use, disclose and transfer (hereinafter “process”) your personal data in the context of the Siemens Job Market & Application Portal (“Job Market & Application Portal”).

1. Which Siemens company has access to your personal data?

The Job Market & Application Portal is provided and operated by Siemens Aktiengesellschaft, Werner-von-Siemens-Straße 1, 80333 Munich, Germany (“**Siemens AG**”). The Job Market & Application Portal offers you various options and choices that influence how we share your data within Siemens:

- Option 1: Create an account and opt to be considered for open positions globally.
- Option 2: Create an account and apply for various open positions selected by you.

If you opted for

- Option 1: Siemens AG will make your personal data accessible to all Siemens group companies worldwide that may consider you for open positions that fit your profile;
- Option 2: your personal data will only be shared by Siemens AG with the Siemens group company offering the relevant job position and the respective (line- and HR-) managers and recruiters responsible for making a hiring decision.

All Siemens companies with access to your personal data according to your choices (hereinafter referred to as “**Siemens**”) are jointly responsible for the proper protection of your personal data. To allow you to effectively exercise your data subject rights in the context of this joint controllership, Siemens AG entered into an agreement with these Siemens companies granting you the right to centrally exercise your data subject rights against Siemens AG, Germany.

2. What categories of data will be processed?

Siemens processes the following personal data about you (“**Your Data**”)

- Information that you actively provide to us when setting up your account in the Siemens Job Market & Application Portal, including your full name, login credentials, contact information, curriculum vitae, additional documents, work experience, qualifications and skills (“**Profile Data**”).
- Publicly available professional data about you, such as data that are published in business and employment oriented social networks or websites such as LinkedIn and Xing (“**Professional Social Network Data**”). Professional Social Network Data are part of your profile and therefore also part of the Profile Data.

For the avoidance of any doubt, data contained in social networks or websites that have no business and employment oriented context, are not considered as Professional Social Network Data and are therefore not collected and processed by us.

- Information that you actively provide to us further in the application process for a specific open position and related information collected by us from you in the course of your interviews and (online-) assessments, including audio and video recordings you prepared during the recruitment process (“**Application Data**”). If you were referred as a candidate by a Siemens employee, we also process information about you that we received from the referring Siemens employee.
- Information contained in your uploaded resume to get matched to open jobs (hereby referred to as “**Get Matched Data**”) without registering or logging in.
- Information on your interaction with the Job Market & Application Portal, including your device and user identifier, information on your operating system, subsites accessed during your visit, the date and time of each visitor request (“**Usage Data**”).

We do not ask you to provide us with special categories of personal data (i.e. information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or sexual orientation) as part of Your Data, unless explicitly required or permitted by law in a given case. **In case you provide us with special categories of personal data, you hereby explicitly consent to the processing of these data as described herein.**

3. What are the purposes for which we process Your Data?

Siemens processes Profile Data (including Professional Social Network Data) for the following purposes:

- To process your application;
- To assess qualifications and personal experience;
- To display further suitable jobs to you as part of your personal user interface in the Job Market & Application Portal; and
- To provide you with information, materials and invitations related to your profile.

Siemens processes Application Data for the following purposes:

- To process your application; and
- To assess qualifications and personal experience.

Siemens processes your Get Matched Data for the following purposes:

- To allow the Job Market & Application Portal to make automated proposals for suitable jobs and to help you finding the open job position(s) that best fit your skills and talents.

Siemens further processes Your Data for the following purposes:

- To provide Job Market & Application Portal services and functions which include: creating and administering your online account; updating, securing, and troubleshooting; providing support; as well as improving and developing the Job Market & Application Portal and our Recruiting processes and services.
- As reasonably necessary to establish or preserve a legal claim or defense; and to prevent fraud or other illegal activities, including attacks on our information technology systems.

4. How does AI (Artificial Intelligence) support the recruiting process?

Siemens uses AI technology in its Job Market & Application Portal to help candidates find suitable job opportunities more effectively.

When you upload your resume via our Job Market & Application Portal, an AI-powered solution analyzes the information in your resume. The AI compares your qualifications (Get-Matched Data) with the information of open positions and suggests suitable open positions. The goal is to present you with relevant job offers more quickly and accurately.

5. Does Siemens process Your Data to perform background checks?

If you receive a hiring offer from Siemens, we may, depending on the job position you applied for, perform background checks.

The type of check carried out and the categories of personal data processed for the check depend on the criticality of the job position for which you received a hiring offer.

We will provide detailed information on the collection and processing of your personal data for background checks in a separate privacy notice before the background check is performed.

6. For how long do we store Your Data?

The storage and retention period for Your Data depends on your choices and the respective categories of personal data:

- **Profile Data (including Professional Social Network Data):**

If you opted to be considered for open positions globally (**Option 1**), we store your Profile Data (including Professional Social Network Data), for a period of three (3) years after your last login. You may also change, update or delete your Profile Data in the self-service section of the Job Market & Application Portal.

If you apply for open positions selected by you (**Option 2**), Your Profile Data (including Professional Social Network Data) will be deleted after the conclusion of the last open recruitment process that is active in your account or six (6) months after your last login (whichever period is longer).

- **Application Data:**

Your Application Data is stored for a period of six (6) months after completion of the respective recruiting process unless you request us to delete the data earlier.

At any point you may request us to delete the data earlier, as described in point 8 (“Your rights”).

An exception to the above-mentioned retention period applies to Profile Data (including Professional Social Network Data) and Application Data that is processed for applications to job offerings of Siemens group companies in the United States and Canada, where local law requires us to retain data for a period of three (3) years after completion of the respective recruiting process.

- Get Matched Data: In case you use the Get Matched functionality without registering or logging in, the corresponding Data will be automatically deleted after 24 hours.
- Usage Data is stored for a period of six (6) months.

7. Who are the recipients of Your Data?

As described above, you have the choice to decide to which Siemens company your data is disclosed. In addition, Siemens may commission service providers (so-called data processors) that support us with processing and use of Your Data, particularly in the area of IT-services.

Recipients of Your Data may be located in countries other than your home country (each a “Third Country”), in which applicable laws do not offer the same level of data protection as the laws of your home country. In such cases and where required by applicable data protection law, Siemens takes measures to implement appropriate and suitable safeguards for the protection of personal data by other means.

- We share Your Data with Siemens companies in third countries only if they (i) have implemented the Siemens Binding Corporate Rules for the protection of personal data (further information about the Siemens BCR can be found [here](#)) or if they (ii) entered into [EU Standard Contractual Clauses](#) with Siemens.
- We transfer Your Data to external recipients in third countries only in case the respective recipient (i) entered into [EU Standard Contractual Clauses](#) with Siemens or (ii) implemented [Binding Corporate Rules](#) in its organization.

You may contact Siemens for further information and/or copies of the safeguards implemented.

8. How to access Your Data? What are your rights?

Data protection laws, including those in the jurisdiction in which you reside may entitle you to specific rights in relation to your personal data. Subject to local legal requirements, you may be entitled to the following rights:

- **Information and Access:** You may request confirmation from Siemens whether or not personal data concerning you are being processed, and where that is the case, you may request access to the personal data;

- Rectification: You may request to rectify and/or update your inaccurate or out-of-date Personal Information;
- Erasure: You may have the right to have your Personal Data erased. This right is subject to restrictions;
- Restriction: You may have the right to have your Personal Data restricted. Restriction means that your Personal Data is only stored by Siemens, and not further processed, while your complaint is dealt with;
- Data Portability: You may have the right to request a copy of your Personal Data, which you actively provided, in a structured, commonly used and machine-readable format and to request from Siemens that we transmit those data to another recipient selected by you;
- Object to Processing: You may have the right to object to specific types of processing on grounds relating to your particular situation, to processing of personal data concerning you.

9. Who to contact in case I have questions or wish to exercise my rights?

It is important to Siemens to allow you to exercise your data privacy rights and ask us any questions you may have easily and effectively. For this purpose and regardless of the Siemens company you applied at, you may approach the central service center of Siemens AG us by using this [Online Form](#).

Alternatively, you may approach the Siemens company you applied at and/or the Siemens Data Protection Organization. The Siemens Data Privacy Organization may be contacted at: dataprotection@siemens.com.

Siemens will always use best efforts to address and settle any requests or complaints you bring to its attention. Besides contacting Siemens, you always have the right to approach the competent data protection authority with your request or complaint. The data protection authority competent for Siemens AG is:

Bayerisches Landesamt für Datenschutzaufsicht
 Promenade 27
 91522 Ansbach
 Germany

10. Processing under the EU's General Data Protection Regulation

This section applies and provides you with further information if your personal data is processed by one of our companies located in the European Economic Area.

The General Data Protection Regulation requires us to provide you with information on the legal basis of the processing of your personal data.

The legal basis for our processing data about you is that such processing is necessary for the purposes of

- exercising our rights and performing our obligations under any contract we make with you (Article 6 (1) (b) General Data Protection Regulation) (“**Contract Performance**”);
- Compliance with our legal obligations (Article 6 (1) (c) General Data Protection Regulation) (“**Compliance with Legal Obligations**”); and/or
- Legitimate interests pursued by us (Article 6 (1) (f) General Data Protection Regulation) (“**Legitimate Interest**”). Generally, the legitimate interest pursued by us in relation to the processing of your personal data is the efficient performance or management of (i) your use of the Job Market & Application Portal and (ii) the processing of your application at Siemens. Where we rely on our legitimate interest for a given purpose, we are of the opinion that our legitimate interest is not overridden by your interests and rights or freedoms, given (i) the regular reviews and related documentation of the processing activities described herein, (ii) the protection of your personal data by our data privacy processes, including our [Binding Corporate Rules on the Protection of Personal Data](#), (iii) the transparency we provide on the processing activity, and (iv) the rights you have in relation to the processing activity. If you wish to obtain further information on this balancing test approach, please contact our Data Privacy Organization at: dataprotection@siemens.com .

11. Processing under the Brazilian General Data Protection Law

This section applies and provides you with further information if the processing by one of our companies (i) occurs in Brazilian territory, (ii) concerns the data of individuals located in Brazilian territory, (iii) comprises personal data collected in Brazilian territory or (iv) has as its objective the offer or supply of goods or services to individuals located in Brazilian territory. In these cases the Brazilian General Data Protection Law (Lei Geral de Proteção de Dados - LGPD) applies to the processing of your personal data and the following additions and/or deviations apply to sections 2, 7, 8, 11 of this Data Privacy Notice:

Your rights

Additionally, to the rights mentioned in this Data Privacy Notice, you are entitled under LGPD to:

- In case you understand your data is not being processed in accordance with the applicable data protection law or in an excessive way, request us to anonymize, block or delete unnecessary or excessive personal data or;
- Request information regarding the public and/or private entities we shared your personal data with;

Legal basis of the processing

The Brazilian General Data Protection Law requires us to provide you with information on the legal basis of the processing of your personal data.

The legal basis for our processing is:

- Article 7 V LGPD (“Contract Performance”);
- Article 7 II LGPD (“Compliance with Legal Obligations”);

- Article 10 I and II LGPD (“Legitimate Interest”).

International transfers

Following the LGPD requirements defined in the Article 33 of Brazilian General Data Protection Law, in the event that we transfer your personal data outside the Brazilian territory, we ensure that your data is protected in a manner which is consistent with the Brazilian General Data Protection Law, we will follow the applicable law and decisions imposed by the proper authority.

Your competent data protection contact

If this section applies, you may also contact our Brazilian Data Privacy Organization at dataprivacy.br@siemens.com .

12. Processing under Canadian privacy laws

Each Siemens company established in Canada (“Siemens in Canada Entity”) maintains your personal data on secure servers that are accessible to authorized employees, representatives or agents who require access for the purposes described in this privacy notice.

Residents of Québec: Please note that your personal data could be communicated outside of the Province of Québec (i.e., extra-provincially/territorially and outside of Canada).

If you have any questions about how a Siemens in Canada Entity processes your personal data, including with respect to its use of service providers outside of Canada, or if you would like to exercise any of your rights in respect of your personal data under the control of a Siemens in Canada Entity, you may contact the Siemens in Canada Privacy Officer at dataprivacy.ca@siemens.com .

13. Processing under People’s Republic of China Personal Information Protection Law

This section applies and provides you with further information if the processing by one of our companies is located within the borders of People’s Republic of China (“PRC”) or concerns the data of individuals within the borders of PRC.

Processing of sensitive personal information

According to the PIPL, sensitive personal information means personal information that, once leaked or illegally used, may easily cause harm to the dignity of natural persons grave harm to personal or property security, including information on biometric characteristics, religious beliefs, specially-designated status, medical health, financial accounts, individual location tracking, etc. as well as the personal information of minors under the age of 14.

In principle, we do not ask you to provide us with sensitive personal data as part of your application data, unless this is required by law in individual cases. In case your sensitive personal information will be processed, we will notify you about the necessity of processing and effects on the individual’s rights and interests, and obtain your specific consent if applicable.

Transfer and disclosure of personal data

Following the requirements defined in the Article 23 of PIPL, additionally to the recipients identified in section 7 of this Privacy Policy, we, in principle, will not transfer or share your personal information to third party controllers, unless (1) obtain your specific consent if applicable, or (2) to fulfill the statutory duties under local laws and regulations.

International Transfer

You acknowledge that your data will be transferred and proceed outside of PRC as described in section 7 in this Privacy Policy. We will follow the applicable laws and decisions imposed by the competent authority, and ensure that your data is protected in a manner which is consistent with the PRC Personal Information Protection Law.

Legal Basis of the processing

The PIPL requires us to provide you with information on the legal basis of the processing of your personal data.

The legal basis for our processing is:

- PIPL Article 13(2) (“**Contract Performance**”);
- PIPL Article 13(3) (“**Statutory duties and responsibilities**”)
- PIPL Article 13(6) (“**Process publicly available data**”);
- PIPL Article 13(1) (“**Consent**”)

Usage by Children

This Online Offering is not directed to children under the age of fourteen (14). We will not knowingly collect personal data from children under the age of fourteen (14) without prior parental consent if required by applicable law. We will only use or disclose personal data about a child to the extent permitted by law, to seek parental consent, pursuant to local law and regulations or to protect a child.

14. Processing under South Africa’s Protection of Personal Information Act

For Business Partners and users located in South Africa, please take note of the following:

In terms of section 1 of the Protection of Personal Information Act, 2013 (“POPI”), “personal data” or “personal information” includes “information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing, juristic person.”

The corresponding legal grounds and conditions for lawful processing of personal data in South Africa are contained in Sections 8 to 25 of POPI, and relate to “Accountability”; “Processing limitation”; “Purpose specification”; “Further processing limitation”; “Information quality”; “Openness”; “Security safeguards” and “Data subject participation”.

In terms of section 69 of POPI, the processing of personal information of a data subject for the purposes of direct marketing by means of any form of electronic communication, including automatic calling machines, facsimile machines, sms’s or e-mail is prohibited unless the data subject has provided consent to the processing, or is, subject to further conditions, an existing customer of the responsible party.

For purposes of a Data Subject exercising its rights further enquiries and the exercise of its rights in relation to access, objection to, and complaints in respect of the processing of personal data, the contact particulars of the Information Regulator of South Africa, are as follows:

JD House, 27 Stiemens Street
Braamfontein
Johannesburg
2001

PO Box 31533
Braamfontein
Johannesburg
2017

Complaints: complaints.IR@justice.gov.za
General enquiries: inforeg@justice.gov.za

15. Processing under Swiss Data Protection Law

Every data subject has the right to enforce her/his rights in court or to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner ([Homepage \(http://www.edoeb.admin.ch\)](http://www.edoeb.admin.ch)).

16. Processing under the United Kingdom's Data Protection Act 2018 and the UK GDPR

This section applies and provides you with further information if your personal data is processed by one of our companies located in the United Kingdom under the Data Protection Act 2018 and/or the UK GDPR (meaning Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018).

Legal basis of the processing

The UK GDPR requires us to provide you with information on the legal basis of the processing of your personal data.

The legal basis for our processing data about you is that such processing is necessary for the purposes of

- exercising our rights and performing our obligations under any contract we make with you (Article 6 (1) (b) UK GDPR) (“**Contract Performance**”);
- compliance with our legal obligations (Article 6 (1) (c) UK GDPR) (“**Compliance with Legal Obligations**”); and/or
- legitimate interests pursued by us (Article 6 (1) (f) UK GDPR) (“**Legitimate Interest**”). Generally, the legitimate interest pursued by us in relation to the

processing of your personal data is the efficient performance or management of (i) your use of the Job Market & Application Portal and (ii) the processing of your application at Siemens.

Where we rely on our legitimate interest for a given purpose, we are of the opinion that our legitimate interest is not overridden by your interests and rights or freedoms, given (i) the regular reviews and related documentation of the processing activities described herein, (ii) the protection of your personal data by our data privacy processes, (iii) the transparency we provide on the processing activity, and (iv) the rights you have in relation to the processing activity. If you wish to obtain further information on this balancing test approach, please contact our Data Privacy Organization at: dataprotection@siemens.com .

International data transfers

In the event that we transfer your personal data outside the United Kingdom, we ensure that your data is protected in a manner which is consistent with the UK GDPR. Therefore, and if required by applicable law, we take the following measures:

- We transfer personal data to recipients outside the United Kingdom only if the recipient has (i) entered into UK [Standard Contractual Clauses](#) with us, or (ii) implemented UK [Binding Corporate Rules](#) in its organization. You may request further information about the safeguards implemented in relation to specific transfers by contacting dataprotection@siemens.com .

Your competent data protection authority

In case of data privacy related concerns and requests, we encourage you to contact our Data Privacy Organization at dataprotection@siemens.com. Besides contacting the Data Privacy Organization, you always have the right to approach the competent data protection authority with your request or complaint.

A list and contact details of local data protection authorities is available [here](#).

17. Further information for US residents

If you are a U.S. resident, then please take note of the following:

Do Not Track

At this time our Online Offerings do not recognize or respond to “Do Not Track” browser signals. For more information on “Do Not Track”, please visit your browser’s support page.

Usage by Children

This Online Offering is not directed to children under the age of thirteen. We will not knowingly collect personal data from children under the age of thirteen without insisting that they seek prior parental consent if required by applicable law. We will only use or disclose personal data about a child to the extent permitted by law, to seek parental consent, pursuant to local law and regulations or to protect a child.

State Rights

Depending on the US state in which you reside, you may have special rights with respect to your personal data. For information regarding any of those rights, please click [here](#).