



# **Privacy Statement**

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## HELLO,

Your personal data is a valuable asset. The protection of your data is particularly important to you and to us. We respect your right to information self-determination and we will take all necessary measures to protect your personal data from unauthorized access, misuse or loss.

The following applies to the handling of your personal data:

"You never get a second chance for a first impression."

We warmly welcome you to our job portal and to a trustworthy application process with us.

AirPlus Recruiting-Team

#### **Foreword**

Throughout this Privacy Statement, we would like to inform you as an applicant<sup>1</sup> about our data protection principles, which every AirPlus company to which you apply has committed itself. Below you will find all the information about the processing of your personal data in accordance with Article 13 GDPR.

## A. Purposes and legal bases of processing

We process your personal data for clearly defined purposes in accordance with the provisions of the EU General Data Protection Regulation ("GDPR") and other national data protection standards such as the German Federal Data Protection Act (BDSG). Depending on the desired place of work and the registered office of the other AirPlus companies, national data protection regulations may apply.

#### 1. Purposes

Use of personal data in our applicant management system

#### 1.1 Online application function in the job portal

Every application to the AirPlus job portal is made via the online application function of our career page <u>Career and jobs at AirPlus</u>. If you as an applicant have filled in the fields of our contact form, your application data will be transmitted to us via the submit function. We will collect your personal data in a direct form that is necessary for the assessment of your suitability as an applicant.

In the contact form, we process the following personal data to process the application:

- Salutation ("Dear")
- Forename
- Surname
- Image (if you want)
- Date of birth
- Work/residence permit
- Contact information (address, place of residence, telephone number and e-mail)
- Salary expectations, availability and willingness to move.

<sup>&</sup>lt;sup>1</sup> The following addresses (you/your): The generic masculine chosen in these notes refers to male, female and other gender identities at the same time. For better readability, the use of masculine and feminine forms of speech is omitted below. All gender identities are explicitly included, insofar as the statements require this.

Based on your submitted application documents, further categories of personal data may be processed by us in the following:

- Application documents: curriculum vitae, transcripts, certificates, references
- Qualifications: educational qualifications, professional experience, further education
- Knowledge and skills: language skills, IT skills, soft skills.
- Information about a severe disability (if you wish to tell us).

#### 1.2 Application-related personal data

The information and details you provide during the online application process will be stored, together with your name, until the application process has been completed (more details in section **C** below). After that, the results will only be stored in anonymized form, e. g. without entering your name, for further statistical evaluation. This statistical data set does not allow any conclusions to be drawn about you as a natural person and only serves as a basis for statistical evaluations.

During the course of the application, you may be required to complete additional recruitment procedures (so-called online assessments).

The processing of your personal data is necessary to achieve the abovementioned purposes, including the fulfilment of a contractual relationship or a pre-contractual activity.

Please note: If the required personal data is not provided or not provided to the required extent, or if AirPlus is unable to collect it, the individual purposes described cannot be provided and we cannot process your application.

Automated decision-making, including profiling, does not take place. In general, you are not required by law or contract to provide the abovementioned personal data.

#### 1.3 Compliance with Laws and Regulatory Requirements

There are times when we may be required to use your personal information to comply with laws and regulations, which may include sharing it with regulators and other relevant authorities. This may be required to detect or prevent potential criminal activity (including terrorist financing, anti-money laundering and other financial crimes). We will only do so on the basis that it is necessary to comply with a legal obligation or where it is in our legitimate interests and those of others.

#### 1.4 Applications for a specific job advertisement

If you have applied for a specific job advertisement, your personal data will be made available to the department advertising the job and the responsible HR department.

You agree that the personal data you provide may also be compared with other vacancies and passed on for review within the other AirPlus companies.

#### 1.5 Applying for several positions and companies

Any AirPlus hiring department will be able to see if you have made multiple job applications, including applications made to another AirPlus company. This has no negative impact on your applications underway, but is how our job portal is designed to ensure efficient processing of applications.

Application data will not be passed on beyond that.

#### 1.6 Record of applicants who have not been successful

If your application does not result in a job offer, a record of your application will be stored. We need this record to uniquely identify you if you apply for the same job again. In this record, all your professional qualifications are deleted.

The record contains the following information only:

- Surname and first name
- Date of birth
- E-mail address
- Job ID.

The recognition record will be deleted after 180 days.

#### 2. Online video interviews

AirPlus uses Microsoft Teams service to conduct online-based video interviews. When using this virtual means of communication, you will be given access to a Microsoft Teams chat and video service by AirPlus via a personalized invitation link. Your video interviews will take place on the Microsoft Teams application. There will be no recording of the interview.

As part of the online interview, the following personal data will be additionally processed:

- Your audio and video data
- Your IP address
- A session cookie.

No documents or other records are transmitted within Microsoft Teams. This data is collected purely to be able to carry out the online job interview. This data is not visible to third parties.

The legal basis for the processing of your data is in accordance with Art. 6 (1) (b) GDPR, in the context of the initiation of an employment relationship. If you are not yet of legal age, we require the consent of your legal quardians.

#### 3. Employee-referral program of AirPlus companies

Depending on your individual application, it may be possible to enter the name of a person employed by us who recommended the job posting to you. By providing this name, you agree that this person will be informed as to whether your application results in an employment relationship. The reason for this is the payment of a referral bonus by us to the referring person.

#### 4. Legal basis for processing

Unless expressly stated otherwise, the legal basis for data processing is Art. 6 (1) (b) and/or (f) of the General Data Protection Regulation (GDPR), meaning:

- the processing is necessary for the performance of a contract to which the data subject may become a party or for the implementation of precontractual measures;
- the processing is necessary for the purposes of the legitimate interests pursued by the Controller (AirPlus) or by a third party.

If you provide us with special categories of personal data in accordance with Art. 9 GDPR (e. g. racial and ethnic origin, political opinions, religious or ideological beliefs or trade union membership, health data), we process them based on your explicit consent in accordance with Art. 6 (1) (a) in conjunction with Art. 88 GDPR and § 26 (2) BDSG.

Please note: You can revoke your consent at any time with effect for the future. Personal data processed before the time of your withdrawal has been lawfully processed.

If you send us your application data by e-mail without using the AirPlus job portal, we reserve the right to record this in our applicant management system the enable the efficient processing of the applications we receive. Unfortunately, postal applications will no longer be accepted by us and will be returned to the addressee.

# **B.** Responsible body

The entity responsible for the processing of your personal data is

Lufthansa AirPlus Servicekarten GmbH Dornhofstraße 10 63263 Neu-Isenburg GERMANY

dataprotection@airplus.com

#### C. Retention

Your personal data will be stored for the purposes set out above and for the period required by law. Your application documents will be deleted after 180 days at the latest unless there is a reason to store the data for a longer period in accordance with Art. 17 (3) GDPR. The responsible body's obligations to provide evidence and to retain data are based on the applicable laws. At the end of the retention period, your personal data will be deleted immediately.

After that, the recruiting data will only be stored in anonymized form, e. g. without providing your name, for further statistical evaluation. This statistical data set does not allow any conclusions to be drawn about the natural person and serves as the basis for statistical evaluations.

In the event of a successful recruitment, your personal data will be transferred from the HR applicant management system to our HR personnel master data system for the purpose of establishing, executing and terminating the employment relationship.

# D. Transfer to processors and third parties

The responsible body will only pass on your personal data for the fulfilment of the purposes listed above. The recipients of your personal data are carefully selected service providers who process your personal data on behalf of and in accordance with the instructions of the responsible body (so-called data processors). Part of our application process is that your data will be co-processed by a service provider. This will involve transmitting the relevant applicant data to our application management system provider as the entity responsible for the technical operation of the AirPlus applicant management (recruiting) system. This processor is prohibited from using your personal data for any other purpose.

This provider is based in Germany and has been carefully selected by us.

For purposes other than those mentioned, your personal data will only be passed on to third parties (e. g. authorities) if there is a legal obligation to do so or if you have consented to this transfer.

If there are any technical problems or questions in the application process, our recruiting team (recruiting@airplus.com) will gladly support you in solving the issue.

#### E. Transfer to third countries

Your personal data will only be transferred to countries outside the European Union or the European Economic Area ("third countries") and countries without an adequacy decision granted by the EU Commission to the extent that this is necessary for the respective purpose or required by law. Such a transfer will only take place under appropriate safeguards so that the level of protection is maintained.

# F. What data protection rights do you have?

For AirPlus, it is important to outline that our processing processes are fair and transparent. Therefore, it is essential that data subjects can exercise the following rights at any time:

- Right of access, Art. 15 GDPR
- Right to rectification, Art. 16 GDPR
- Right to erasure ("right to be forgotten"), Art. 17 GDPR
- Right to restriction of processing, Art. 18 GDPR
- Right to data portability, Art. 20 GDPR
- Right to object, Art. 21 GDPR.

If the processing is based on a **legitimate interest** (Art. 6 (1) (f) GDPR), you have the right to object (Art. 21 GDPR).

Please note: In the event of an objection, AirPlus cannot continue with your job application.

In the case of **consent** (Art. 6 (1) (a) GDPR), you have the right to revoke your consent from future processing. This does not affect the lawfulness of the processing up to the time of your revocation. In the case of consent or if the processing is based on the performance of a contract with you (Art. 6 (1) (a) and (b) GDPR), you also have the right to data portability (Art. 20 GDPR).

Furthermore, you have the right to lodge a complaint with a supervisory authority in accordance with Art. 77 GDPR in conjunction with § 19 BDSG. The supervisory authority which is responsible for Lufthansa AirPlus Servicekarten GmbH is:

#### The Hessian Commissioner for Data Protection and Information Security

P.O. Box 3163 65021 Wiesbaden

Gustav-Stresemann-Ring 1 65189 Wiesbaden

poststelle@datenschutz.hessen.de

# G. Enforcement and compliance with data protection principles

AirPlus undertakes to comply with the above-stipulated data protection principles as described. If you have any questions or suggestions regarding the handling of your personal data, you can contact the Data Protection Officer of the responsible body at any time:

Lufthansa AirPlus Servicekarten GmbH Data Protection Officer Dornhofstraße 10 63263 Neu-Isenburg

dataprotection@airplus.com

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#### **GOOD LUCK!**

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