



With this data protection notice, EWM AG (as well as all other companies of the EWM Group (an overview of the individual companies can be found at <https://www.ewm-group.com/en/contact/branches.html> (hereinafter also referred to collectively as the "EWM Group")) fulfils its existing statutory duty to provide information in accordance with Article 13 of the General Data Protection Regulation ("GDPR") with regard to the processing of personal data in the employment relationship or in the application process. In the following, we will therefore use our data protection notice to explain which of your personal data we process and how. Please contact us if you have any further questions. You will find our contact details above and at the end of this data protection notice.

Personal Data

Personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

This includes, for example, information such as your name, address, telephone number, location, email address, bank details and date of birth.

Processing of personal Data

When processing data, we handle your personal data responsibly. Therefore, your personal data will of course be processed in compliance with the applicable national (the German Federal Data Protection Act "FDPA") and European data protection regulations (in particular the EU General Data Protection Regulation "GDPR").

A processing of personal data in this respect is any operation or set of operations which is performed upon personal data, whether by automatic means. In particular, data processing shall be understood as the collection, recording, organisation, classification, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

Purpose of the processing of personal data

We process personal data in accordance with the specifications and requirements set out below as part of automated processing.

The primary statutory authorisation basis for the processing of personal data in the employment relationship is section 26 FDPA.

Applicants are deemed to be employees pursuant to section 26(8) sentence 2 FDPA.

Under the following conditions, data processing in the employment relationship may be carried out based on the legal authorisation basis of Section 26 FDPA:

The data processing is necessary regarding the establishment, implementation or termination of an employment relationship or the necessity regarding the exercise or fulfilment of the rights and obligations of the employee's representation of interests resulting from a law or a collective agreement (purposes under works constitution law) is given.

In addition, data processing in the employment relationship may take place for the purpose of detecting criminal offences in the employment relationship.

Your data is required for the establishment and implementation of the employment relationship with you. You are therefore obliged to provide this personal data upon conclusion of the contract and during the performance of the contractual relationship, otherwise we cannot establish an employment relationship with you.



Data protection notice Employment relationship / Applicant

The primary authorisation basis for the data transfer of employee data within the EWM Group is Art. 6 (1) sentence 1 lit. f GDPR (see below: "Recipients of personal data").

Regarding the fulfilment of legal obligations, Art. 6 (1) sentence 1 lit. c GDPR is relevant as an authorisation basis.

Furthermore, data processing may take place in accordance with Art. 6 (1) sentence 1 lit. f GDPR if we have a legitimate interest in doing so. Such a legitimate interest always exists if we have an economic, legal, or ideal interest and your interests worthy of protection do not outweigh this.

Unless this is based on a legal authorisation, your personal data will only be processed by us if you give your express consent in accordance with Art. 6 (1) sentence 1 lit. a GDPR in conjunction with Art. 7 GDPR. Art. 7 GDPR. For this purpose, you have the option of giving your declaration of consent voluntarily. Failure to give your consent has no disadvantages for you. You can request your consent for inspection at any time and revoke it at any time by sending us an e-mail or by post. The revocation of consent does not affect the permissibility of the processing carried out until the revocation. You will find our contact details above and at the end of this data protection notice.

According to the legislator's opinion, such consent can be given by you pursuant to Section 26 (2) FDPA if a legal or economic advantage is achieved for you (e.g. the introduction of a company health management system for health promotion, permission for private use of company IT systems) or if the employer and the employee pursue similar interests (e.g. the inclusion of name and date of birth in a birthday list or the use of videos or photos of the employee on the internet/intranet). Only in these cases will we obtain voluntary consent from you, if necessary, in compliance with the requirements.

Automated decision-making in individual cases, including profiling in accordance with Art. 22 GDPR, does not take place.

The scope of the processing of your personal data is limited by the respective purposes outlined above.

Job application

If you apply to us, the data you provide will be processed by us to check whether we wish to establish and carry out an employment relationship with you.

If you apply online via our career portal, your data will be stored and processed on the systems of our software partner HRworks GmbH. A corresponding order processing agreement has been concluded with this partner in accordance with Art. 28 GDPR. Our software partner HRworks GmbH will only process your data in accordance with the legal requirements and only in accordance with instructions as part of the fulfilment of the order as a processor. It has also taken the necessary security, technical and organisational measures.

During the application process, the usual correspondence data such as postal address, e-mail address and telephone numbers are stored in addition to salutation, surname and first name. In addition, application documents such as letters of motivation, curriculum vitae, professional, educational, and further training qualifications as well as references are recorded.

The applicant data sent to us and entered by you will generally only be processed until the time of the decision on employment, if an employment relationship does not come about. The data will be deleted four months after the rejection has been sent or after the application documents have been returned to the applicant.

Storage in an applicant pool only takes place if you expressly give us your consent to do so. This storage takes place for a maximum period of two years.

If we enter an employment relationship with you, the data you have provided to us will be processed for the purpose of establishing, implementing and, if necessary, terminating the employment relationship.

The data can be processed for statistical purposes (e.g., reporting). It is not possible to draw conclusions about individual persons.



The basis for authorisation is section 26 FDPA (section 26(8) sentence 2 FDPA).

Joint responsibility contracts pursuant to Art. 26 GDPR

A joint responsibility agreement within the meaning of Art. 26 GDPR has been concluded between EWM AG (and the EWM Group companies shown at <https://www.ewm-group.com/en/contact/branches.html> (Europe)). The above-mentioned contracting parties jointly determine the corresponding purposes and essential means of the processing of certain personal data in the areas of personnel, marketing, and sales.

We are happy to comply with our legal obligation regarding the provision of the essential points of the contract of joint responsibility. You can access this information at https://www.ewm-group.com/images/pdf/datenschutz/EN_EDV-IT_IN_Contract_common_responsibility-Information_sheet.pdf.

Duration of data processing

The maximum period of storage depends on the purpose of the data processing. The duration of the storage depends on the period for which the processing is necessary for the fulfilment of the purpose, in particular with regard to the establishment, implementation or termination of the employment relationship with you, or for the fulfilment of legal obligations (e.g. retention obligations under commercial and tax law in accordance with § 257 HGB and § 147 AO / retention obligations under social insurance law).

After you have left the company as an employee, the data will be deleted in accordance with data protection law at the end of the year three years after you have left, whereby the year in which you left will not be counted.

The applicant data sent to us and entered by you will in principle only be processed until the time of the decision on employment if an employment relationship does not come about. The data will be deleted four months after the rejection has been sent or after the application documents have been returned to the applicant.

The declaration of consent given, if any, is generally valid until revoked by the person concerned. However, an "unused" declaration of consent may lose its effectiveness after a period of two years. After a period of two years in which the consent is not used, the data is deleted.

Statutory retention obligations remain unaffected.

Recipients of the personal data

Personal data may be transferred between the individual departments if this is necessary.

If necessary, data is transferred within the EWM Group (an overview of the individual companies can be found at <https://www.ewm-group.com/en/contact/branches.html>), insofar as this is necessary to fulfil the respective purpose. The primary authorisation basis for data transfer within a group of companies is Art. 6 para. 1 sentence 1 lit. f GDPR. According to this, data processing is lawful if the processing is necessary to protect our legitimate interests, unless the interests or fundamental rights of the data subject prevail. In the recitals to the GDPR, which serve as interpretative aids to the GDPR, recital 48 specifies the legitimate interest for the transfer within a group of companies. According to this, the transfer within the EWM Group for internal administrative purposes regarding the processing of employee data qualifies as a legitimate interest of ours within the meaning of Art. 6 (1) sentence 1 lit. f GDPR. Internal administrative purposes related to employee data in this sense may include central personnel planning and development, the provision of personnel services and travel expense settlements.

Furthermore, other companies of the EWM Group have access to your personal data (an overview of the individual companies can be found at <https://www.ewm-group.com/en/contact/branches.html> as follows):

Intranet (information platform, noticeboard, sharing of employee information, employee directory), personal data: First name, last name, business e-mail address and telephone numbers, EWM Group company, department, function, photograph.



Furthermore, data may be transferred to external third parties if this is necessary for the fulfilment of the purpose. These include, for example, credit institutions, creditors, tax offices, social insurance agencies, employment agencies, health insurance companies, doctors, pension funds, pension insurance companies, DATEV eG or advertising agencies.

Processors used are contractually bound to the requirements of Art. 28 GDPR. Order processors will only process your data in accordance with the legal requirements and only within the scope of fulfilling the order in accordance with our instructions.

Location of the data processing measures

Data processing takes place in member states of the European Union (EU) as well as in third countries. Any relocation to a third country generally only takes place if the special requirements of Art. 44 et seq. GDPR are fulfilled.

Security / Technical and organisational measures

We take all necessary technical and organisational measures, considering the requirements of Art. 24, 25 and 32 GDPR, to protect your personal data against loss, destruction, access, alteration or distribution by unauthorised persons and against misuse. For example, we comply with the legal requirements for pseudonymisation and encryption of personal data, confidentiality, integrity, availability and resilience of systems and services related to processing, availability of personal data and the ability to quickly restore it in the event of a physical or technical incident, as well as the establishment of procedures to regularly review, assess and evaluate the effectiveness of technical and organisational measures to ensure the security of processing. Furthermore, we also comply with the requirements of Art. 25 GDPR regarding the principles of "privacy by design" (data protection through technology design) and "privacy by default" (data protection through data protection-friendly default settings).

Your rights

You have a right to free information about your personal data and, if the legal requirements are met, a right to correction, blocking and deletion of your data, to restriction of processing, to data portability and a right of objection.

Insofar as we base the processing of your personal data on the balance of interests, you may object to the processing. This is the case if the processing is not necessary for the performance of a contract with you. When exercising such an objection, we ask you to explain the reasons why we should not process your personal data as we have done. In the event of your justified objection, we will review the merits of the case and either stop or adapt the data processing or show you our compelling legitimate grounds based on which we will continue the processing.

You also have the possibility to complain to the competent supervisory authority (e.g., State Commissioner for Data Protection and Freedom of Information Rhineland-Palatinate, Hintere Bleiche 34, 55116 Mainz). If you have any questions about the processing of your personal data or questions relating to the rights, or if you wish to exercise these rights or make suggestions, please contact us or our external data protection officer:

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