



GLOBAL PRIVACY POLICY FOR APPLICANTS

Responsible Function:

People & Leadership

Approved by:

President & CEO

In connection with our recruitment process, Luvata may collect and maintain information about its job applicants. We have a responsibility to safeguard the information in our possession and we are very clear about what is collected and how it is used.

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GLOBAL PRIVACY POLICY FOR APPLICANTS

1. Introduction

Luvata entity, to which you are applying for a job, and its direct and indirect subsidiaries (collectively, “Luvata”) collect and maintain personal data concerning their job applicants in order to manage the job application and the recruitment process. However, Luvata recognizes the importance of protecting your privacy and has a responsibility to safeguard the personal data in our possession and we are very clear about what is collected and how it is used. This Global Privacy Policy for Applicants (this “Policy”) describes, among other things, the personal data collected by Luvata from its applicants and how Luvata uses that information.

This Policy is a global privacy policy covering the processing of personal data of Luvata's applicants located worldwide. In addition, there might be local applicant privacy policies which in that case shall prevail over this global Policy. Please see for the country specific policies in Section 11 of this Policy.

2. Collection of Applicant Information

In connection with our recruitment process, Luvata may ask you to provide certain basic information, including, but not limited to, your name, mailing address, telephone numbers, gender, birth date, citizenship and nationality. Luvata also processes information contained in your job application and information collected and processed during the recruitment process. All personal data described in this paragraph is collectively “Applicant Information”.

Primarily, Luvata collects personal data directly from you. When allowed by applicable laws, Luvata may also collect personal data from other sources, such as publicly available databases.

3. Use of Applicant Information and Legal Basis for Processing

Luvata processes Applicant Information as part of its recruitment process, such as to handle job applications, to inform applicants about the progress of recruitment, and to arrange interviews.

For Applicant Information, the legal basis for processing personal data is based on you submitting your job application to Luvata.

4. Disclosure of Applicant Information

Applicant Information will be disclosed to a limited number of Luvata employees whose job includes maintaining, compiling or otherwise have access to Applicant Information.



Luvata may also disclose Applicant Information to a third party when it believes, in good faith, that such disclosure is reasonably necessary to comply with any applicable law or to protect the rights, property, or safety of another person. Additionally, Luvata may disclose Applicant Information to a third party who provides for example outsourced recruitment or aptitude test services. Luvata will only disclose Applicant Information to a third party when there is a legal basis for doing so. If Luvata does disclose information to such a third party, Luvata will enter into a written agreement with such third party as required by the General Data Protection Regulation (EU) 2016/679 ("GDPR"). Lastly, Luvata may transfer or otherwise disclose Applicant Information in connection with the sale of its business to a third party.

5. International Transfer of Applicant Information

Applicant Information will be accessed electronically by a limited number of Luvata employees only at the location where the job application was submitted by the applicant, and will not be transferred internationally.

6. Security

Luvata has taken, and will continue to take, appropriate technical and organizational measures to protect all Applicant Information from destruction, loss, or unauthorized alteration, disclosure or access.

For example, Luvata limits access to personal data to authorized employees and contractors who need to know the information in the course of their work tasks.

7. Retention of Applicant Information

Applicant Information will only be stored as long as necessary considering the purposes for which it was collected and in accordance with applicable legal retention periods, which vary from country to country. When the retention period of Applicant Information has expired, it will be erased in a permanent and secure way.

8. Modifications to this Policy

Luvata may, in its discretion, at any time modify this Policy. Upon modification of this Policy, Luvata will take reasonable measures to make the Policy available to you, such as prominently posting a revised Policy which describes all intended uses and disclosures of Applicant Information.

9. Your Rights Regarding Your Applicant Information

You have the right to:

- Have access to your Applicant Information and correct, amend, or delete your Applicant Information at any time. However, please note that certain Applicant Information is strictly necessary in order to fulfil the purposes defined in this Policy and may also be required by applicable laws. Thus, you may not remove such Information.
- Object for and restrict certain processing, to the extent required by applicable laws.
- Data portability, i.e. right to receive your personal data in a structured, commonly used machine-readable format and transmit your personal data to another data controller, to the extent required by applicable laws.

All above-mentioned requests shall be submitted in writing to mail@luvata.com.

10. Complaints and Contact Information

If you believe Luvata has breached its Policy by permitting an unauthorized access, alteration, destruction, use, disclosure, or transmission of your Applicant Information, you may contact or file a complaint to the local Human Resources Manager.

Additionally and independently, Luvata's applicants located in the EU/ETA may also contact EU Data Protection authorities in the Member State of their habitual residence, place of work or place of the alleged infringement of the GDPR.

For any questions regarding your privacy, you can reach Luvata at mail@luvata.com.

11. Country Specific Policies

Please click on link below and look under "Privacy policy" if you wish to get more country specific information on the processing of your personal data.

[Luvata public policies webpage](#)