

# **Data protection information for applicants**

We, **ODS Metering Systems B.V** (also referred to in the following as “we” or “us”) inform you in this document about the processing of your personal data and your rights in connection with your application.

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**1. Name and contact details of the controller**  
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## 2. Information on relevant processing activities

### 2.1 Applications via the online application portal, by email or letter or via headhunters

#### 2.1.1. Purpose of data processing:

We process your personal data for decision-making on the establishment of an employment relationship (processing of your application) and, as the case may be, for defense purposes in the event of a legal dispute.

We also process your personal data in order to comply with our legal obligations.

#### 2.1.2. Legal bases of data processing:

Data processing for the processing of applications takes place on the basis of Article 6(1)(b) of the GDPR. We process special categories of personal data on the basis of Article 9(2)(b) GDPR.

In the case of data processing for which you have given your consent, data processing takes place on the basis of Article 6(1)(a) GDPR. If we also process special categories of personal data on the basis of your consent, the data processing takes place on the basis of Article 9(2)(a) GDPR.

Any data processing for the purpose of defense in the context of legal disputes takes place on the basis of Article 6(1)(f) GDPR (balancing of interests). The legitimate interests here consist in being able to prove the lawful conduct of the application process in any proceedings. We process special categories of personal data on the basis of Article 9(2)(f) GDPR.

You have the right to withdraw your consent at any time. We will then no longer process your personal data on the basis of your consent. However, withdrawing consent does not affect the lawfulness of any processing done on the basis of your consent before it was withdrawn. Such processing therefore remains lawful even after the withdrawal of consent. You can withdraw your consent by email to [hr-solution@kloeckner.com](mailto:hr-solution@kloeckner.com).

Data processing for compliance with legal obligations takes place on the basis of Article 6(1)(c) GDPR.

#### 2.1.3. Recipients:

The following recipients/categories of recipients have access to your data:

- Internal departments;
- In some cases, other Klöckner companies;
- External service providers whom we use for the provision of services, such as IT infrastructure operators;
- Headhunters;
- Public-sector entities: public authorities and government institutions, such as prosecutors or courts to which we may be required to submit personal data in individual cases;
- Private-sector entities: counsel such as external lawyers and other professional consulting providers or other private-sector entities to which or to whom we transfer your personal data on the basis of a legal requirement or your consent.

#### 2.1.4. Intended third-country transfer:

In the context of your application, your personal data may be transferred to bodies whose registered office or place of data processing is not located in a member state of the European Union or other signatory state to the Agreement on the European Economic Area. For this purpose – other than in exceptional cases allowed by law – we ensure that there is an adequate level of data protection at the recipient (for instance, on the basis of an adequacy decision by the European Commission or suitable guarantees such as agreement with the recipient of EU standard

data protection clauses as published by the European Commission) or that you have given your express consent.

If you would like a copy of the specific arrangements agreed to ensure an adequate level of data protection, please request one using our contact details under heading 1.

#### 2.1.5. Storage duration:

We will generally store your data for a period of 6 months from the time of completion of the application process. If you have consented to receiving additional job offers from us, the retention period is 24 months from the time of completion of the application process. In specific cases, we retain your Application Data beyond the aforementioned periods insofar as permitted or required by statutory provisions other than the aforementioned.

If an employment relationship is established between you and us, we will not delete your Application Data in its entirety, but will incorporate it to the extent necessary in your personnel file. We will then process that data for performance of the employment relationship. You will then be provided with more detailed information on this separately.

#### 2.1.6. Obligation to provide data and consequences of not providing data:

You are not required to provide us with personal data either by contract or by law. However, the provision of certain items of personal data is required for processing your application and for deciding whether to enter into a contract of employment.

#### **Supplementary information for applicants using the online application portal**

The items of personal data required for processing your application and deciding whether to enter into a contract of employment are marked as such in the online application portal. You may decline to provide any Application Data not designated as “required” without incurring any disadvantages in connection with the application process.

#### 2.1.7. Categories of personal data:

We process the following categories of personal data concerning you:

- Title, first and last name;
- Email address;
- Language preference;
- Personal application documents (CV, cover letter and any other documents you provide);
- Information on how you heard about Klöckner;
- Any preferences regarding division of the company and place of work, if applicable;
- Salary expectations, if applicable.

(jointly referred to as “Application Data”).

#### 2.1.8. Sources of personal data:

In cases where we obtain your personal data from third parties, it originates from the following sources:

- Headhunters from whom we receive your application data for the purpose of an application;
- Your publicly viewable profile in professional social media networks (such as StepStone, Monster, LinkedIn and Xing).

## 2.2 Provision of our online application portal

### 2.2.1. Purpose of data processing:

We process your personal data for the purpose of providing our online application portal, including, but not limited to, technically enabling you to access it using your web browser.

### 2.2.2. Legal bases of data processing:

The data processing takes place on the basis of Article 6(1)(f) GDPR (balancing of interests).

It takes place if, on the balance of interests, we come to the conclusion that your interests or fundamental rights or freedoms do not override our interests (and/or those of third parties). Our legitimate interest in this connection is as follows:

- Provision of our online application portal.

### 2.2.3. Recipients:

The following recipients/categories of recipients have access to your data:

- Hosting providers;
- Internal departments;
- External service providers whom we use for the provision of services such as technical support, IT infrastructure operation or provision of the online application portal;
- Public-sector entities: public authorities and government institutions, such as prosecutors or courts to which we may be required to submit personal data in individual cases;
- Private-sector entities: counsel such as external lawyers and other professional consulting providers or other private-sector entities to which or to whom we transfer your personal data on the basis of a legal requirement or your consent.

### 2.2.4. Intended third-country transfer:

In the context of your application, your personal data may be transferred to bodies whose registered office or place of data processing is not located in a member state of the European Union or other signatory state to the Agreement on the European Economic Area. For this purpose – other than in exceptional cases allowed by law – we ensure that there is an adequate level of data protection at the recipient (for instance, on the basis of an adequacy decision by the European Commission or suitable guarantees such as agreement with the recipient of EU standard data protection clauses as published by the European Commission) or that you have given your express consent.

If you would like a copy of the specific arrangements agreed to ensure an adequate level of data protection, please request one using our contact details under heading 1.

### 2.2.5. Storage duration:

Once your Usage Data has been obtained, it will be stored for the duration of your visit to our site.

### 2.2.6. Obligation to provide data and consequences of not providing data:

There is no legal or contractual obligation to provide your Usage Data. However, we require your Usage Data to enable you to access our online application portal and utilize the features and services made available there.

### 2.2.7. Categories of personal data:

We process the following categories of personal data concerning you:

- Your IP address;
- The date and time of access;

- The time zone difference to Greenwich Mean Time (GMT);
- Which pages on the site you view;
- Your access status/HTTP status code;
- The volume of data transferred;
- The website from which you access our site;
- Which browser you are using (including language and version);
- Your operating system and interface;

(jointly referred to as “Usage Data”).

### 3. Automated decision-making (Article 22 GDPR)

No use is made of automated decision-making, including profiling.

### 4. Rights as data subject

Subject to meeting the legal requirements, you have the following rights:

- To obtain confirmation of whether we process personal data concerning you; if so, you have the right of **access** to the data and information on the processing (**Article 15 GDPR**).
- To obtain **rectification** of inaccurate personal data concerning you and to have incomplete personal data concerning you completed (**Article 16 GDPR**).
- To obtain **erasure** of personal data concerning you, including if the processing was carried out unlawfully or is no longer necessary (**Article 17 GDPR**).
- To obtain **restriction of processing** of personal data concerning you, including in lieu of erasure of the data (**Article 18 GDPR**).
- To receive personal data concerning you, which you have provided, in a structured, commonly used and machine-readable format, and to transmit that data to another controller where the processing is carried out by automated means and is based on your consent or a contract with you (**data portability, Article 20 GDPR**).
- At any time, and with effect for the future, to withdraw any consent you have given us to process your personal data (**withdrawal of consent, Article 7 GDPR**). This does not affect the lawfulness of the processing of your data prior to withdrawing consent.

#### **Right to object on grounds relating to your particular situation:**

You have the right to object at any time, on grounds relating to your particular situation, to processing of personal data concerning you which is based on Article 6(1)(e) GDPR (performance of a task carried out in the public interest or in the exercise of official authority) or Article 6(1)(f) GDPR (balancing of interests); this also applies to any profiling based on these provisions.

If you exercise your right to object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for processing that override your interests, rights and freedoms, or the processing is for the purpose of establishing, exercising or defending legal claims.

**In order to assert your rights as a data subject, you may contact us at any time using the contact details for the Data Protection Officer provided above under heading 1.**

If you consider that the processing of your personal data violates data protection law, you may also lodge a **complaint with a supervisory authority**, in particular in the EU member state or, in Germany, *Bundesland* of your habitual residence, place of work or place of the alleged infringement.

***As of December 2022***