

Applicant Data Protection Policy

Doosan Bobcat EMEA: Applicant Data Protection Policy

This Applicant Data Protection Policy governs the processing of your personal data by Doosan Bobcat EMEA s.r.o. hereinafter: “**Doosan**”) and its affiliates:

- Doosan Bobcat EMEA s.r.o. and its branches in United-Kingdom, Germany, Ireland, Belgium and France.
- Doosan International Luxemburg SARL
- Doosan Benelux SA
- Doosan Infracore Europe SA
- Doosan International UK Limited
- Bobcat France S.A.S
- Bobcat Lyon SAS
- Bobcat Bensheim GmbH
- Doosan International Italia S.r.l

as part of your application for a job at Doosan or any of its affiliates, either through the use of the “Careers at Doosan” <https://jobs.doosan.com/> -website or any website of any of Doosan’s affiliates (the “**Websites**”) or by any other means, and subsequent communication with us via e-mail, telephone, fax and Social Media Channels (e.g. LinkedIn) in relation to any job offers.

NOTE 1. This Applicant Data Protection Policy relates to the specific processing of personal data of applicants applying for a job at Doosan or its affiliates. For our general policy in relation to the use of our Websites and our communication with you in any other capacity than as a job applicant, please refer to our [General Data Protection Policy](#).

NOTE 2. If you want information on how we process personal data via cookies, social plugins and other types of tracking technology, please refer to our [Cookie Policy](#).

By using the form on the “Working at Doosan”-website, clicking “Apply now” and submitting your application after having been informed about this Applicant Data Protection Policy in the disclaimer of the “Working at Doosan”-website, you acknowledge that you have read this policy carefully and that you agree with it without reservation.

1. IN GENERAL

- 1.1 Your personal data are processed by Doosan Bobcat EMEA s.r.o., U Kodetky 1810, 263 12 Dobris, with corporate registration number 26489201, and its affiliates (hereinafter: “**Doosan**”, “**we**”, “**us**”, “**our**”). You can contact us via e-mail at hrdpemea@Doosan.com.
- 1.2 Any reference in this Data Protection Policy to certain laws or regulations also includes any change, replacement or annulment of these laws or regulations, including any related executive decisions.
- 1.3 We reserve the right to modify this Applicant Data Protection Policy from time to time at our own discretion. Such modification will be communicated via the Websites. If we do not receive such an e-mail from you within three (3) business days after the modifications have been announced on the Websites, you will be deemed to have accepted all modifications.

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2. TYPES OF PERSONAL DATA WE PROCESS

2.1 When you apply for a job with Doosan, we collect the following personal data about you:

- Your contact details and basic identity information that you provide us with, such as your photo, name, postal address, e-mail address, phone number, date and place of birth, nationality, etc.;
- Resume-related information, such as former and current employer, work experience, education, skills, references, etc.;
- Any other personal data you choose to provide us as part of your application.;
- Publicly available information of your profile on social media channels.

2.2 In principle we obtain the personal data mentioned above directly from you. However, if you choose to apply via an external recruitment company, your personal data are received by us via the external recruitment company. It is that company's responsibility to relay the information contained in this Applicant Data Protection Policy to you. We advise that you consult the privacy policy of your external recruitment company to ascertain which personal data it processes about you, what the conditions for that processing are and how you can exercise your rights *vis-à-vis* that company. We will not send any of the personal data you provide via the "Working at Doosan"-website or in any other manner to external recruitment agencies unless you explicitly consent to it.

2.3 If we offer you a position, our internal recruitment department may also add personal data pertaining to your application to your profile.

2.4 Our application process, in particular through the application form on the Websites, is not meant to involve the processing of personal data that can be construed as sensitive data. Sensitive data are personal data that pertain to your race or ethnicity, political affiliations, religious convictions, membership of a union, your health or sex life or criminal history. If such information becomes relevant as part of the application process, you will be specifically asked for it and be given the opportunity to consent to the processing of these sensitive data separately.

If you nevertheless choose to upload or otherwise provide sensitive data about yourself, your uploading or provision of these will constitute your freely given, specific, informed, explicit and unambiguous written consent to our processing of these data in line with this Applicant Data Protection Policy.

3. PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA

3.1 We process your personal data to allow you to apply for employment with us and to allow us to process, assess and decide on your application.

3.2 We also process your personal data in order for you to receive relevant and personalised information regarding future opportunities for employment with Doosan if you have registered to receive this.

3.3 We process your personal data in order for us to be able to defend ourselves in case of a dispute regarding your application (such as related to our refusal of your application).



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- 3.4 If an application process for a particular position with us leads to a successful outcome, the personal data you provided may be used for human resources purposes for all aspects relating to your employment with us.
- 3.5 We process your personal data to perform statistical analysis to improve our application and recruitment process and our service offering in general. Such processing shall take place in a pseudonymised manner where possible.
- 3.6 We process your personal data to comply with our legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities.
- 3.7 We process your personal data for informing any third party in the context of a possible merger with, acquisition by/of, demerger by, or other share or asset purchase deal with that third party and its advisers, even if that third party is located outside the European Union.
- 3.8 We also process your personal data for the preservation of our legitimate interests or those of our partners or a third party if your application-related use of the Websites or your application in general can be considered: (a) a violation of any applicable terms of use of the Websites or the intellectual property rights or any other right of a third party, (b) a danger or threat to the security or integrity of our Websites, social media channels or other communication channels or any of our or our affiliates' subcontractors' underlying IT systems due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or (d) in any way hateful, obscene, discriminating, racist, slanderous, spiteful, hurtful or in some other way inappropriate or illegal.

4. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

- 4.1 We process your personal data for the purpose outlined in Article 3.1 because that processing is necessary in order to take steps at your request prior to entering into a contract.
- 4.2 The processing of your personal data for the purpose outlined in Article 3.2 is based on your consent.
- 4.3 The processing of your personal data for the purpose outlined in Article 3.3 is necessary for the protection of our legitimate interest of being able to defend ourselves in case of a dispute.
- 4.4 The processing of your personal data for the purpose outlined in Article 3.4 is necessary for the protection of our legitimate interest to save time and resources in order to run a more efficient business by re-using already available information where permitted.
- 4.5 The processing of your personal data for the purpose outlined in Article 3.5 is necessary for the protection of our legitimate interest to continuously improve our Websites, Social Media Channels, products and services to ensure that you have the best experience possible.
- 4.6 The processing of your personal data for the purpose outlined in Article 3.6 is necessary to allow us to comply with our legal obligations.
- 4.7 The processing of your personal data for the purpose outlined in Article 3.7 is necessary for the protection of our legitimate interest of being able to explore or conduct normal corporate or M&A transactions.

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- 4.8 The processing of your personal data for the purpose outlined in Article 3.8 is necessary for the protection of our legitimate interest to keep our Websites, Social Media Channels, products and services safe from misuse and illegal activity.

5. TO WHOM WE SEND YOUR DATA

- 5.1 We rely on third party processors to provide you our Websites and Social Media Channels, including the “Working at Doosan”-website, as well as to process your personal data on our behalf. These third party processors are only allowed to process your personal data on our behalf upon our explicit written instruction.
- 5.2 We share your personal data with other entities within the Doosan Group of companies. However, we will ensure that all Doosan entities will take due care that all processing of your personal data is in line with what is set out in this Applicant Data Protection Policy.
- 5.3 Your personal data may be shared upon our own initiative with the police or the judicial authorities as evidence or if there are justified suspicions of an unlawful act or crime committed by you in the context of your application.

6. LOCATION AND TRANSFER

- 6.1 We process your personal data first and foremost within the European Economic Area (EEA). However, in order to process your personal data for the purposes outlined in Article 3 of this Applicant Data Protection Policy, we may also transfer your personal data to other entities within our Group or to third parties who process on our behalf outside the EEA. Should such transfer take place, Doosan will ensure that there are safeguards in place to ensure the safety and integrity of your data as well as all rights with respect to your personal data you might enjoy under applicable mandatory law.
- 6.2 Each entity outside the EEA that processes your personal data shall be bound to observe adequate safeguards in order to ensure the safety and integrity of your data. Such safeguards will be the consequence of:
- The country of the recipient having legislation in place which may be considered equivalent to the protection offered within the EEA; or
 - Of a contractual arrangement between us and that entity. All our entities are parties to a contractual agreement based on the European Commission’s Standard Contractual Articles (controller-to-controller) (Commission Decision C(2004)5721).

7. QUALITY ASSURANCES

- 7.1 Your personal data are only processed for as long as needed to achieve the purposes listed under Article 3 of this Applicant Data Protection Policy or, regarding the purposes in Article 3.1 and 3.2, up until such time where you withdraw your consent for processing them. We will de-identify your personal data when they are no longer necessary for the purposes outlined in Article 3 of this Applicant Data Protection Policy, unless there is:
- An overriding interest of Doosan or any other third party, in keeping our personal data identifiable;



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- A legal or regulatory obligation or a judicial or administrative order that prevents us from de-identifying them.
- 7.2 You understand that an essential aspect of the use of our “Working at Doosan”-website, or otherwise applying for a role with us or our affiliates, involves assessments of your professional as well as relevant personal characteristics in order to find you a suitable position with us or our affiliates, or to determine your suitability for a given position. This means that we build and use a profile of you based on these relevant characteristics. Note, however, that these assessments are never fully automated and require human intervention.
- 7.3 We will take appropriate technical and organizational measures to keep your personal data safe from unauthorised access or theft as well as accidental loss, tampering or destruction. Access by our personnel or our third party processors will only be on a need-to-know basis and will be subject to strict confidentiality obligations. You understand, however, that safety and security are best efforts obligations which can never be guaranteed.

8. YOUR RIGHTS

- 8.1 You have the right to request access to all personal data pertaining to you that we process. We reserve the right to charge an administrative fee for multiple subsequent requests for access that are clearly submitted for the purpose of causing nuisance or harm to us. Each request has to specify for which processing activity you wish to exercise your right of access and which data categories you wish to gain access to.
- 8.2 You have the right to ask that any personal data pertaining to you that are inaccurate, are corrected free of charge. If you submit a request for correction, such request has to be accompanied by proof of the flawed nature of the data for which correction is asked.
- 8.3 You have the right to withdraw your earlier given consent for the processing of your personal data.
- 8.4 You have the right to request that personal data pertaining to you be deleted if these data are no longer required in the light of the purposes outlined in Article 3 above or if you withdraw your consent for processing them. However, we will evaluate a request for deletion against:
- Overriding interests of Doosan or any other third party;
 - Any legal or regulatory obligations or administrative or judicial orders which may contradict such deletion.

Instead of deletion you can also ask that we limit the processing of your personal data if (a) you contest the accuracy of the data, (b) the processing is illegitimate, or (c) the data are no longer needed for the purposes listed under Article 3.

- 8.5 You have the right to oppose the processing of personal data, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- 8.6 You have the right to receive from us in a structured, commonly used and machine-readable format all personal data you have provided to us.



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8.7 If you wish to submit a request to exercise one or more of the rights mentioned above, you can send an e-mail to hrdpemea@Doosan.com . An e-mail requesting to exercise a right will not be construed as consent with the processing of your personal data beyond what is required for handling your request. Any request has to clearly state which right you wish to exercise and the reasons for it if such is required. It should also be dated and signed, and accompanied by a digitally scanned copy of your valid identity card proving your identity. If you use the contact form on the Websites, we may ask you for your signed confirmation and proof of identity.

We will promptly inform you of having received this request. If the request proves valid, we will honour it as soon as reasonably possible and at the latest thirty (30) days after having received the request.

If you have any complaint regarding our processing of your personal data by us, please feel free to contact us via e-mail at hrdpemea@Doosan.com . Should you remain unsatisfied with our response, you have the right to file a complaint with the competent data protection authority.