



A1 RECRUITMENT PRIVACY STATEMENT

1. Scope

This Privacy Statement describes how we process your personal data when you apply for a position with us. This Privacy Statement applies only when processing is conducted by the controllers based in Austria as listed in paragraph 2 below. Candidates applying for roles in locations outside of Austria should refer to the respective data privacy statements.

We process your personal data in accordance with European and national Austrian data protection regulations, in particular the General Data Protection Regulation (GDPR), the Austrian Data Protection Act (DSG) and the Telecommunications Act (TKG) 2021.

We use terms such as "processing", "personal data", "processor", "controller", "data subject" as they are defined in the GDPR.

2. Who is responsible for data processing?

In Austria, the controller responsible for data processing will be the company advertising the job opening. This may be the following company:

A1 Telekom Austria AG	Lassallestrasse 9, 1020 Vienna	recruiting.dataprotection@a1.group
Telekom Austria AG	Lassallestrasse 9, 1020 Vienna	dataprotection@a1.group
A1 Digital International GmbH	Lassallestrasse 9, 1020 Vienna	privacy@a1.digital

You may contact the data protection officer of each company using the contacts details indicated above.

3. Types of personal data we process

We may will process your personal data when you register for an account with us and/or when you submit an application for a position. We may process the following types of data:

- (a) **Basic personal data:** first name, last name, phone number, email address, date of birth, home address, and other direct identifiers such as ID documentation, where this is permitted by applicable laws;
- (b) **Personal data relating to your application:** information about professional experience and education, employment history, language skills, right to work information, covering letter/ letter of motivation, curriculum vitae;
- (c) **Technical data:** information related to your use of the website such as IP address, login information, operating system and other data collected by our website or external recruitment website, if we use a third-party provider; and



(d) **Other documents** and information which you attach voluntarily to your application.

4. Purpose and lawful basis for processing personal data

Please find below an explanation as to which of your personal data we process for what purpose and to what extent.

Purpose	Legal Basis
Assess whether you are a suitable candidate for a position and contact you in this regard.	We will process your personal data based on the legal basis of the legitimate interest pursuant to Article 6(1)(f) GDPR to review your application.
Conduct the screening including your previous employment history, criminal history and your educational record, if permitted by applicable laws.	Similarly, we will rely on our legitimate interest under Article 6(1)(f) GDPR to verify the information you provided to us as part of your application.
Where you have been successful with your application, we will need to process the information you have submitted and conduct pre-employment check .	The legal ground for processing personal data in this case is the necessity to perform the contract or the pre-contractual measures at the request of the data subject as specified in Article 6(1)(b) GDPR.
Comply with our obligations under employment, immigration and other laws applicable to us.	The lawful basis is compliance with legal obligations to which we are subject (Article 6(1)(c) GDPR), for example where we need to respond to your requests pertaining to exercising your data privacy rights.
Contact you about further career opportunities with us.	In such a case, the legal basis of the processing will be your consent under Article 6(1)(a) GDPR.
Protect our interest where necessary for the exercise or defence of legal claims and complaints.	We will process your personal data based on our legitimate interest according to Article 6(1)(f) GDPR.
Ask you for your feedback on the recruitment process.	If you agree to provide such feedback, the legal basis of the processing will be your consent under Article 6(1)(a) GDPR.

You can withdraw the consent you have given us at any time. To do so, please contact us at the address indicated in paragraph 2 above. If you withdraw your consent, we will no longer process your data for those purposes. The withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the withdrawal.

5. Data Retention

We will not retain your personal data for longer than is necessary to fulfil the purposes described above, except where longer retention period is permitted by law.

If your application is successful, your personal data may be further processed in relation to your future employment with us to allow us to comply with any legal requirements required of us as employer.

If your application is unsuccessful, we will erase your personal data no later than 7 months after rejecting your application. If you have given us your consent, your application will be stored for 3 years in the A1 Group-wide recruitment database to which the recruiters of all our A1 Group



companies have access. In such case may contact you again, to check if you would like to continue to be contacted by us about future career opportunities.

6. Recipients of personal data and international transfers

We will only transfer your personal data to third parties if we have a valid reason for such transfer, and to the extent such transfer complies with applicable law. However, we may be legally obliged to disclose your information to courts, prosecutors, police or other authorities.

Our service providers may process your personal data. These service providers normally carry out certain tasks or provide services for us such as IT services, delivering administration tools and software solutions etc. In particular, we use Workday recruitment portal to receive and process your application. Any personal data you provide to us through Workday will be securely stored within Workday's cloud environment located in the EU.

For international positions, we will store your information in the A1 Group recruitment data base to be shared with the following group companies: Telekom Austria AG; A1 Digital International GmbH; A1 Digital Deutschland GmbH; A1 Slovenija d.d., Slovenia; A1 Hrvatska d.o.o., Croatia; A1 Srbija d.o.o., Serbia; A1 Bulgaria EAD, Bulgaria; and A1 Makedonija DOOEL, Macedonia. We have in place binding Group-wide data protection and information security policies which govern our internal data processing activities.

Even if we engage a processor to process data on our behalf, we shall remain responsible for the protection of your data. For this reason, we contractually oblige third-party companies to keep your data confidential and to comply with data protection regulations. We shall engage processors outside the European Union only if (i) a European Commission adequacy decision has been made for the third country in question or (ii) if we have agreed appropriate guarantees or binding data protection regulations with the processor to ensure that the European level of data protection and the European data security standards are maintained.

7. Data Security

In order to protect your data, we have appropriate technological and organisational measures in place. We also train our employees in handling personal data on a regular basis.

8. Your rights

You may assert the following rights with respect to the processing of your data:

Right of access: You may request confirmation from us as to whether your data is being processed by us and to what extent.

Right to rectification: If we process your personal data which is incomplete or incorrect, you may request that we correct or supplement them.

Right to erasure: You may request that we erase your personal data if we have unlawfully processed them or if such processing disproportionately interferes with your legitimate interests that need to be protected. Please note that there may be reasons preventing immediate erasure, e.g. in case of statutory obligations to retain documents.



Right to restrict processing: You are entitled to request us to restrict the processing of your data if:

- you contest the accuracy of the data, for a period enabling us to verify the accuracy of the data;
- the data processing is unlawful, but you oppose the erasure of the data and request the restriction of their use instead;
- we no longer need the data for the intended purpose, but you need these data for the establishment or defence of legal claims; or
- you have objected to processing the data.

Right to data portability: You may request that we make available to you the data you have entrusted to us for storage in a structured, common and machine-readable format, provided that:

- we process this data based on your consent or for the fulfilment of a contract between us, and
- such processing is carried out using automated procedures.

Right to object: If we process your data for the performance of tasks in the public interest, for the exercise of official authority or if we refer to the necessity of safeguarding our legitimate interest during processing, you may object to this data processing if there is a predominant interest in protecting your data. You can object to the sending of an offer or advertisement at any time without giving reasons.

Right to appeal: If you are of the opinion that we violate Austrian or European data protection law when processing your data, please contact us to clarify any questions you may have. Of course, you also have the right to complain to the Austrian Data Protection Authority (www.dsb.gv.at) as well as to a supervisory authority within the EU.

9. How can you assert your rights?

If you wish to assert any of the aforementioned rights, please contact us at the address indicated in this Privacy Statement.

Confirmation of Identity:

When processing your inquiry, we may request additional information to confirm your identity, e.g. a legible copy of a valid photo ID with signature. This is to protect your rights and privacy.

Excessive Claiming of Rights:

Should you exercise any of the above rights manifestly unfounded or particularly frequently, we may charge a reasonable processing fee or refuse to handle your request.