

# PRIVACY POLICY

This Privacy Policy describes how the entities of the Applus + IDIADA group identified [here](#) (jointly as 'IDIADA', 'We', 'Us') collect and process your personal data, how your personal data are processed, used and protected, in addition to the options available to you for deciding how We, in our role as data processor, may process your personal data.

**Data Controller:** The entities of the Applus +IDIADA group are identified in our Data Privacy Policy.

**Main purposes:** To evaluate the application for employment submitted by the applicant in relation to a particular job vacancy within IDIADA.

**Legal Basis:** Legitimate interest in assessing the characteristics of the applicant, Compliance with legal obligations and the Applicant's consent.

**Recipients:** Other companies pertaining to the Applus+ Group different from the ones identified as "Data Controller", Service Providers, Public Administrations, security forces and bodies, jurisdictional bodies and other third parties with authority to compel.

**Rights:** access, rectification, erasure and portability, as well as to object to and restrict the processing thereof.

This Privacy Policy applies to all personal data We collect about you as a candidate in relation to job vacancies promoted by IDIADA, both through ongoing selection processes and those that may be opened in the future. '**Personal Data**' means any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular 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.

## 1. What personal data do We collect?

We collect your personal data from a variety of sources, including the information you provide directly for example, when you apply for a particular job, and the information We collect about you from other sources such as employment portals, social networks, professional associations, professional bodies, educational establishments, employment services, associations, foundations, recruitment consultants, relocation agencies, temporary work agencies, and job promotion programmes, among others (insofar as such information is publicly available and as allowed under the applicable laws).

Please note that personal data marked as mandatory are necessary for us to evaluate your candidature and therefore We will not be able to continue the selection process if such mandatory data is not provided correctly.

❖ **Personal data you provide to Us:**

The categories of personal data that you provide to Us include:

- Personal data and contact information, such as name(s) and surname(s), personal e-mail address and telephone number, home address, date of birth, national identification number / NIE / passport / driving licence and type, photograph, gender, hobbies;
- Family details, children, age of children, marital status;
- Remuneration data (bank details, base salary, bonuses, benefits, social security number and tax code);
- Data on work/immigration permit: nationality, residence or work permit data, draft contract of employment;
- Job and work history: current job description, position, salary plan, salary level or category, unit/department, location, supervisor(s) and subordinate(s), work history and Work Life Report, Public Employment Service enrolment;
- Data on talent, hiring and candidature, education and training data (data included in cover letters and CVs, work history and references, educational history, academic record, academic qualifications or certificates of completion, professional qualifications, languages and other relevant skills, data on performance management ratings, development plan and willingness to transfer); and
- Reports regarding your possible participation in language and/or psycho-technical tests.

❖ **Personal data We collect from other sources:**

The following are examples of the categories of personal data We normally collect from other sources:

- Information obtained through social networks and/or employment portals, including name, address, telephone, email, professional experience or academic data;
- Reports regarding your possible participation in language and/or psycho-technical tests; report received by the service provider based on language or psycho-technical tests carried out; and
- Employment history and professional references, in the event that We contact a former employer to request references about performance in previous jobs.

This information is obtained through employment portals, social networks, professional associations, educational centres, employment services, associations, foundations, recruitment consultants, relocation companies, temporary employment agencies and job promotion programmes, among others.

❖ **Other personal data We process about you**

We may also collect other personal data about you from your participation in Our selection process, such as those obtained during the personal interviews We conduct.

#### ❖ **Special categories of personal data**

Some of the categories of data We collect are considered special categories of data or specially protected data (also known as sensitive data).

Specifically, We will deal with the following special categories of personal data:

- Degree and certificate of disability, insofar as you voluntarily provide us with this information. Please note that IDIADA does not request information from you that may be considered "sensitive data" (e.g. degree of disability). However, if you choose, at your own discretion, to voluntarily submit such information for IDIADA to consider in evaluating your candidature, such information will be used for that purpose. By submitting such information to us, you consent to IDIADA collecting and processing such "sensitive data" for these purposes; and
- Results of psycho-technical tests, as provided by the service provider designated for this purpose by IDIADA.

## **2. How do We use your personal data and on what legal basis?**

Your personal data will be processed for the purposes and on the legal basis indicated below:

- Evaluate your candidature in relation to the ongoing selection processes, as well as in the context of future processes in relation to any vacancies that IDIADA may need to fill, taking into account the particularities of the specific post and your suitability for it, on the **basis of IDIADA's legitimate interest** in this regard. In order to be able to rely on this basis to carry out the processing of your personal data, We have carried out a balancing test in order to ensure that your interests, or fundamental rights and freedoms, do not prevail over our legitimate interests;
- We will process your personal data as long as you **have given your prior consent** in connection with the processing of special categories of personal data that you choose to submit to us voluntarily so that IDIADA can take it into consideration in evaluating your candidature, as well as results of psycho-technical tests;
- Likewise, We will also transfer your personal data to other IDIADA Group entities other than those identified at the beginning of this Privacy so that they may assess your candidature in the context of their own selection processes relating to vacancies that fit your characteristics, **on the basis of your prior consent for such purposes**;
- In some cases, We will transfer your personal data to third parties not belonging to the IDIADA Group, such as university and non-university teaching centres and/or vocational training schools, in order to sign the appropriate agreements and/or arrangements for the incorporation of trainees, or to companies for which IDIADA provides certain services in the context of the selection process. Such assignments **will only be made with your consent for such purposes**; and
- We will also process your personal data to ensure an optimal level of compliance with **applicable legal obligations** to which IDIADA is subject by virtue of legislation on,

among other things, employment and occupational hazard prevention, as well as to cooperate with regulatory bodies and law enforcement authorities where necessary.

For the same purposes as mentioned above, We will allow third-party service providers and suppliers contracted by Us to access the personal data so that they can carry out the services that are the subject of these contracts, as described in greater detail in Section 4.

### 3. Your rights regarding your personal data

You have certain rights in relation to your personal data, without prejudice to local law.

In particular, you are entitled to receive confirmation from IDIADA acknowledging whether or not it is processing your personal data and, if applicable, to request access to the personal data and also to certain information about the processing (e.g. purposes, categories of personal data processed and recipients, etc.) (**right to access**). You are also entitled to request the rectification of inaccurate personal data (**right to rectification**), and the erasure of your personal data when, among other reasons, they are no longer necessary for the purposes for which they were collected (**right to erasure**). In certain circumstances (for example, in the event that the data subject challenges the accuracy of his or her personal data, while the accuracy of such data is being checked), you may request that the processing of your personal data be restricted, and that such data be processed only for the purpose of filing or defending claims (**right to restriction of processing**). Finally, you may exercise your right to data portability, i.e. to receive personal data in a structured, commonly used and machine-readable format, and to transmit such personal data to another data controller without hindrance from the data controller to whom the personal data were provided where legally permitted for such purposes (**right to data portability**).

In addition to the aforementioned rights, you are also entitled, at any time, to **withdraw the consent** you may have granted for a specific processing operation, as well as to **object** on grounds relating to your particular situation, to our processing of your personal data on the basis of our legitimate interests or those of a third party, in which case We will stop processing your personal data unless We can rely on legitimate reasons to do so. Likewise, you may object to your data being processed by certain entities of the IDIADA Group identified at the beginning of this Privacy in the context of their own vacancies, using the same mechanism described in the following paragraph.

You may exercise your rights by writing an email, including a copy of your ID card or equivalent identification document to [data\\_protection@idiada.com](mailto:data_protection@idiada.com). We encourage you to contact Us to update or correct your information as soon as it changes, or if the personal data We hold about you is inaccurate. We will be sure to contact you if We need additional information in order to fulfil any of the requests described in this Section.

IDIADA is committed to protecting your personal data as described in this Privacy and as required by applicable law. If you have any questions or would like additional information on how to exercise your rights, please do not hesitate to contact Us at [data\\_protection@idiada.com](mailto:data_protection@idiada.com).

#### 4. How do We share your personal data and with whom?

IDIADA may share your personal data with third parties in the following circumstances:

- **Third parties not belonging to the IDIADA Group** such as:
  - University and non-university teaching centres and/or vocational training schools, in order to sign the appropriate agreements and/or arrangements for the incorporation of internship students, or
  - IDIADA clients in the context of the selection process.

The above assignments will be made **on the basis of your prior consent**.

- **Other IDIADA Group entities** other than those identified at the beginning of this Privacy, in which there may be a vacancy that fits your characteristics so that they may assess your profile in the context of their own selection processes, provided that you give your prior consent for such purposes.
- **Service providers.** We will allow our service providers who perform services relating to, among others, recruitment, selection, evaluation, social research, administration, IT and training to access your personal data in order to carry out the data processing necessary to support the purposes described in Section 3 of this Privacy. We will enter into a written agreement obliging them to refrain from any further unauthorised communication of personal data, to use personal data only for the purpose of providing the corresponding services and in accordance with the instructions received from IDIADA, to store only the personal data necessary to comply with these purposes of protecting our interests, and to have adequate and appropriate security measures in place.
- **Public administrations, regulatory bodies, law enforcement agencies, courts and other third parties with authority to obligate**, insofar as necessary to comply with a legal or regulatory obligation, or to otherwise protect our own rights or the rights of third parties.

Since We operate as part of a global business, the above-mentioned recipients may be located outside the jurisdiction in which you are located (or in which We provide the services), which are considered not to provide an adequate level of protection for personal data. Please refer to the "International Data Transfers" section for further information.

#### 5. How do We protect your personal data?

We implement technical and organizational measures to guarantee a level of security appropriate to the risk of the personal data We process. These measures aim to ensure the ongoing integrity and confidentiality of personal data. We evaluate these measures periodically to ensure the security of the processing.

## **6. How long do We store your personal data?**

We will store your personal data for a period of 5 years from the time you provide us with your personal data. We will only store your personal data after this date if We are required to do so to comply with the law, or if there are pending claims or complaints that require Us to store your personal data or if You give your consent for such purposes.

## **7. International data transfers**

Your personal data may be communicated to, stored and processed in a country that does not provide an adequate level of protection of personal data. In this regard, We have applied appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data are adequately protected.

For more information on the appropriate safeguards in place, please contact Us using the contact details below.

## **8. Contact Us**

IDIADA is responsible for the processing of data in relation to the personal data We collect and process in accordance with this Privacy.

If you have questions or concerns about the processing of your personal data, please contact Us at [data\\_protection@idiada.com](mailto:data_protection@idiada.com).

We are committed to working with you to fairly resolve any complaints or concerns regarding privacy. However, if you feel that We have not been able to help you with your complaint or concern, you are entitled to file a claim with the local Data Protection Agency.

**1<sup>st</sup> January 2023**