



Global Telco Consult GmbH Recruitment Privacy Policy

Please read the following document carefully to understand Global Telco Consult GmbH's (GTC) practices regarding how GTC collects and processes personal information during recruitment.

By submitting an application to GTC, you consent to the processing of your personal data for the recruitment process as provided in this policy, and you acknowledge that your consent to the processing of your personal data (as described herein) is voluntary.

The consent to process personal data can be revoked at any time in text form (e.g. GTC's email address hr@globaltelcoconsult.com). After the revocation, GTC undertakes to stop processing and permanently remove and delete all of the candidate's personal data that has been processed by GTC (where permanent removal and deletion are possible).

This Recruitment Privacy Policy sets out the basis on which GTC will process the personal information the candidate provides to GTC in connection with GTC's recruitment.

For the purposes of the General Data Protection Regulation ("GDPR"), the data controller is Global Telco Consult GmbH, headquartered in Eichenstr. 11, 82166 Gräfelfing, Germany. The data controller is based in the territory of the European Union.

All questions, comments and requests relating to this policy should be directed to hr@globaltelcoconsult.com.

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1. Policy Statement

- 1.1. The Global Telco Consult GmbH (hereinafter “GTC”) takes the candidate’s privacy very seriously. This Recruitment Privacy Policy (hereinafter “Policy”) is aligned with the obligations under art. 12-14 of the General Data Protection Regulation (hereinafter “GDPR”) and sets out the basis on which GTC will process the personal information that the candidate provides to GTC in connection with GTC’s recruitment of new personnel for open positions.
- 1.2. By applying to GTC, the candidate consents to process his/her/their personal data for recruitment as provided in this Policy.
- 1.3. The candidate must read this Policy carefully to understand GTC practices on how GTC processes personal information.
- 1.4. GTC is committed to hiring the most professional team members while respecting a candidate's right to privacy.

2. Personal Data Collected from the Candidate

- 2.1. **PERSONAL DATA COLLECTED DIRECTLY FROM THE CANDIDATE.** GTC collects and processes all or part of the following categories of information provided by the candidate:
 - 2.1.1. Information provided within the application, including information provided through an online job portal, via e-mail, personally or through any communication tool used during interviews.
 - 2.1.2. in particular, name, e-mail address, contact information, date and place of birth, nationality, gender, education, professional qualifications, job experience, all information which is provided solely by the candidate, as well as the candidate’s image, taken from his/her/their presentation video and any eventual interviews conducted through online communication platforms
 - 2.1.3. any metadata about the candidate’s visit to GTC’s website, for which GTC strongly recommends to read GTC’s website privacy policy.
- 2.2. **PERSONAL DATA COLLECTED FROM OTHER SOURCES.** If the candidate applies for one of GTC’s open positions through a social network (i. e. LinkedIn) or online job portal, GTC will collect the personal data that the candidate has provided within the application made through this network or portal, as well as any information included in the candidate’s profile saved within the same platform. Such personal information may include name, contact information, address, previous job experiences and employment information (i.e. employer, location of employment, employment period etc.), educational background, professional certifications, attributes, date of birth, gender, nationality, as well as candidate’s image or sound if the candidate provides a profile picture, a presentation video or any sound bite through the aforementioned online portals. GTC might use the technologies provided by the online job portals to search for candidates who could potentially fit GTC’s criteria for



open positions. Such criteria should be solely based on previous job experiences, and professional affinities with the specific role GTC is looking for. If the candidate wants to know more about the technologies the online job portals use for providing such services, GTC strongly encourages the candidate to read the privacy policies provided by the online job portal through which the candidate sends the application.

3. Use of the Collected Personal Data

- 3.1. **LEGAL BASIS FOR PROCESSING.** GTC rely on the candidate's consent, allowing GTC to process the personal data provided through the application/recruitment process for legally processing the candidate's personal data under article 6 par. 1 of the GDPR (let. a).
- 3.2. **PURPOSES OF PROCESSING.** GTC uses candidate's personal data for the following purposes:
 - 3.2.1. receipt and evaluation of the candidate's application for open positions;
 - 3.2.2. communication with the candidate throughout the application/recruitment process;
 - 3.2.3. scheduling of appointments with the candidate for the purposes of recruitment.
- 3.3. **PROFILING / AUTOMATED DECISION MAKING.** As stated previously, GTC may use the technology offered by online job platforms to select the appropriate candidates based on criteria GTC has specifically set out or typical of the role for which the candidate has applied. The process of finding suitable candidates is automatic; however, any decision on whom GTC will hire to fill the vacancy will be made by those responsible for hiring.

4. Security and Confidentiality of Candidate's Personal Data

- 4.1. GTC regards the personal data that the candidate provides GTC throughout the application process as confidential. This means that such information will be allowed to be processed solely by the members of the GTC team involved with the hiring process. Every single person involved in such a process is subject to confidentiality obligations and any other obligations set forth by the applicable law.
- 4.2. GTC takes appropriate measures to ensure that all personal data is kept safe, including security measures to prevent accidental loss or unauthorised use or access of personal data. GTC has procedures in place to address any suspected data security breaches. GTC will notify any necessary supervisory authority of a data security breach, where we are legally required to do so, as specified under art. 33 GDPR and you, if any of the candidate's rights and/or freedoms are at high risk due to the experienced data breach, as set under art. 34 GDPR.

5. Storing of the Personal Data and the Retention Period

- 5.1. If the personal data is stored in GTC's servers, it will be so in our electronic folders, contained in GTC's cloud storage, accessible only from authorised GTC personnel. This data remains within the territory of the European Economic Area.
- 5.2. GTC will keep the personal data sent by the candidate in his/her/their application for a maximum period of 6 months after the end of the recruitment process for the open position for which the candidate has applied. The personal data will be immediately deleted in the following cases:
 - 5.2.1. erasure of personal data requested by the candidate, unless it is found to be still retainable due to the overriding legitimate interest, such as for the basis of our or an interested party's defence claims
 - 5.2.2. deletion of the candidate's application by an authorised person from GTC should the candidate's application be rejected during the recruitment process.

6. Candidate's rights

- 6.1. Based on chapter II of the GDPR, as a data subject, the candidate can choose to use the following rights, in the vast majority of cases free of charge, at any time:
 - 6.1.1. access to his/her/their personal data and some additional information that this Policy has already been designed to provide the candidate with (in case more than one copy were to be requested, GTC reserves itself the right to charge an appropriate amount for each copy)
 - 6.1.2. ask for the correction of any errors found in the candidate's personal data
 - 6.1.3. ask for immediate deletion of the candidate's personal data from GTC systems unless GTC's legitimate interests in retaining such data, such as in cases of constituting a defence claim, is found to be overriding
 - 6.1.4. receive the personal data that the candidate has provided in a structured, commonly used and machine-readable format, and have the right to pass it on to third parties if technically possible
 - 6.1.5. oppose to any personal data processing conducted by GTC unless GTC's legitimate interests in the further processing of such data are found to be overriding
 - 6.1.6. object to the decisions made by means of automated processes that would produce legal effects for the candidate or which, in a similar way, have a significant impact on the candidate;
 - 6.1.7. limit the processing of the candidate's personal data
- 6.2. For further information regarding these rights, including the circumstances in which they apply, GTC welcomes the candidates to visit the web pages provided by the candidate's local data protection supervisory authority.
- 6.3. If the candidate would like to exercise one of the rights mentioned above, the candidate must do the following:
 - 6.3.1. contact GTC at the e-mail address found at the bottom of this document
 - 6.3.2. provide an identification;
 - 6.3.3. provide the nature of the candidate's request.

7. Final Provisions

- 7.1. GTC hopes to resolve any questions or concerns the candidate may have regarding processing his/her/their personal data.
 - 7.2. The GDPR further provides the candidate with the right to lodge a complaint with a supervisory authority, particularly in the state of the European Union (or the European Economic Area) within which the candidate works, conducts his/her/their life predominantly or where an alleged violation of data protection laws has occurred. The complaint can be submitted, for example, to the Bavarian Data Protection Authority (Bayerisches Landesamt für Datenschutzaufsicht) through the procedure illustrated here (in German): [Online-Beschwerde einreichen \(bayern.de\)](#).
 - 7.3. All questions, comments and requests relating to this Policy should be directed to hr@globaltelcoconsult.com.
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