

## PRIVACY POLICY FOR APPLICANTS (M/W/D)

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We are pleased that you would like to apply for a job with us. In the following we explain how we process your personal data in the context of an application and provide further relevant information in this context.

### 1. Who is responsible for processing your personal data?

The HEICO Group, Abraham-Lincoln-Straße 20, 65189 Wiesbaden, in the narrower sense HEICO Holding GmbH and its subsidiaries

HEICO Property Partners GmbH  
HEICO Technik GmbH  
HEICO Investment Management GmbH  
HEICO Aircraft Maintenance GmbH  
HEICO Aircraft Cleaning GmbH  
HEICO Service GmbH  
HEICO Career GmbH  
PRIMAJOB GmbH

(hereinafter referred to as "we"), is the controller within the meaning of the EU Datenschutz-Grundverordnung Regulation ("DSGVO").

### 2. Data protection officer

The company data protection officer is Mr. Christian Adolphy, FON: 0611/408096-90, e-mail: [christian.adolphy@ca-c.de](mailto:christian.adolphy@ca-c.de).

### 3. For what purposes and on what legal basis do we process personal data?

We process your personal data for the purpose of your application for an employment, insofar as this is necessary for the decision on the establishment of an employment relationship with us. The legal basis for this is § 26 Abs. 1 i. V. m Abs. 8 S. 2 BDSG.

Furthermore, we may process personal data about you, insofar as this is necessary for the defence of legal claims asserted against us from the application process. The legal basis for this is Art. 6 Abs. 1, Buchstabe f DSGVO, the legitimate interest being for example, a duty to provide evidence in proceedings under the Allgemeinen Gleichbehandlungsgesetz (AGG).

Insofar as an employment relationship arises between you and us, we may, in accordance with § 26 Abs. 1 BDSG, further process the personal data already received from you for the purposes of the employment relationship if this is necessary for the performance or termination of the employment relationship or for the exercise or fulfilment of the rights and obligations of the

representation of employees' interests resulting from a law or a collective agreement, a works agreement or a service agreement (collective agreement).

#### **4. What categories of personal data do we process?**

We process data related to your application. This may include general personal data (such as name, address, date of birth and contact details), information about your professional qualifications and schooling, or information about your continuing professional development, or other information that you provide to us in connection with your application.

We may also process job-related information that you make publicly available, such as a profile on professional social media networks.

#### **5. What are the categories of recipients?**

We may transfer your personal data to the companies of the HEICO Group as well as to authorised third parties (customers and service providers in the recruitment agency), insofar as this is permissible within the framework of the purposes and legal bases set out in section 3. Furthermore, personal data is processed on our behalf on the basis of contracts in accordance with Art. 28 DSGVO, in particular by host providers or providers of applicant management systems.

#### **6. Is the transfer to a third country intended?**

A transfer to a third country is not intended.

#### **7. How long will your data be stored?**

We store your personal data for as long as is necessary for the decision on your application. If an employment relationship between you and us does not come about, we may also continue to store data insofar as this is necessary for the defence against possible legal claims. In this case, the application documents are deleted six months after the announcement of the rejection decision, unless longer storage is necessary due to legal disputes.

#### **8. What rights do you have?**

As an applicant with us, you have the following data protection rights, depending on the situation in the individual case, which you can exercise at any time by contacting us or our data protection officer using the data specified in points 1 and 2:

##### **a. Information**

You have the right to obtain information about your personal data processed by us and to request access to your personal data and/or copies of said data. This includes information on the purpose of use, the category of data used, its recipients and persons authorised to access it and, if possible, the planned duration of data storage or, if this is not possible, the criteria for determining this duration;

b. Correction, deletion or restriction of processing

You have the right to request that we correct any inaccurate personal data relating to you without undue delay. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

c. Right of objection

Insofar as the processing of personal data relating to you is carried out on the basis of Art. 6 Abs 1 Buchstabe f DSGVO you have the right to object to the processing of this data at any time for reasons arising from your particular situation. We will then no longer process this personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims.

d. Right of withdrawal

If the processing is based on consent, you have the right to revoke your consent at any time without affecting the lawfulness of the processing carried out on the basis of the consent until revocation. To do this, you can contact us or our data protection officer at any time using the data provided above.

e. Right to deletion

You have the right to request that we delete personal data relating to you without undue delay and we are obliged to delete personal data without undue delay if one of the following reasons applies:

- The personal data are no longer necessary for the purposes for which they were collected or otherwise processed
- You object to the processing in accordance with 8.c above and there are no overriding legitimate grounds for the processing.
- The personal data have been processed unlawfully.
- The erasure of the personal data is necessary for compliance with a legal obligation under Union or Member State law to which we are subject.
- This does not apply insofar as the processing is necessary:
- for compliance with a legal obligation which requires processing under Union or Member State law to which we are subject.
- for the assertion, exercise or defence of legal claims.

f. Right to restrict processing

- The accuracy of the personal data is disputed by you for a period of time that enables us to verify the accuracy of the personal data.
- The processing is unlawful and you refuse the erasure of the personal data and instead request the restriction of the use of the personal data;
- We no longer need the personal data for the purposes of processing, but you need it for the assertion, exercise or defence of legal claims, or
- you have objected to the processing in accordance with point 8.c above, as long as it has not yet been determined whether our legitimate grounds outweigh yours.

Where processing has been restricted in accordance with this point, those personal data may be processed, apart from being stored, only with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of substantial public interest of the Union or of a Member State.

If you have obtained a restriction on processing, we will inform you before the restriction is lifted.

g. Right to data portability

You have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format, and you have the right to transfer this data to another controller without hindrance from us to whom the personal data has been provided, if

- the processing is based on consent pursuant to Art. 6 Abs. 1 a or Art. 9 Abs. 2 a DSGVO, or is based on a contract pursuant to Art. 6 Abs. 1 b DSGVO and
- the processing is carried out with the aid of automated procedures.

h. Right of appeal

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your residence, place of work or the place of the alleged infringement, if you consider that the processing of personal data relating to you infringes the DSGVO.

**9. necessity of providing personal data**

The provision of personal data is neither legally nor contractually required, nor are you obliged to provide the personal data. However, the provision of personal data is necessary for the conclusion of an employment contract with us. This means that if you do not provide us with personal data when applying for a job, we will not enter into an employment relationship with you.

**10. No automated decision-making**

There is no automated decision in individual cases within the meaning of Art. 22 DSGVO, i.e. the decision on your application is not based exclusively on automated processing.