Data Privacy Statement – Schaeffler E-Recruiting System

Schaeffler’s recruiting system is an internet-assisted application belonging to Schaeffler AG and companies in which Schaeffler AG directly or indirectly holds the majority stake (hereinafter abbreviated to “Schaeffler”) and that are part of the system. Schaeffler operates this application worldwide to publish career opportunities and to carry out the application process. The E-Recruiting system gives you access to our worldwide recruitment market at all times.

The protection of your personal data is a matter of great importance and a high priority for us. Whenever personal data are processed as part of the use of the E-Recruiting system, we observe the applicable regulations specified by data privacy law. The following information provides an overview of how we process your personal data when Schaeffler’s E-Recruiting system is used and of your rights under data privacy law.

1. Scope and purpose of personal data processing

We generally only record and use your personal data only when this is required for the purpose of registering for the E-Recruiting system, carrying out the application process, and searching for positions (or in order to justify a working relationship). The regular recording and use of your personal data take place only after you have given your consent. Cases in which the processing of these data is permitted by legal regulations are exempted from this.

The use of the system makes it necessary for your personal data to be processed in the following ways:

1.1. Registration for external candidates

In order to use the recruiting system, it is initially necessary for you to provide us with specific personal data (so-called “basic data”) for registration purposes, i.e. your last name and e-mail address. No other information is initially required. All input screen fields that are marked with a * are “mandatory fields”; if you do not complete these fields, you will not be able to register for and use the recruiting system. The completion of all other input screen fields is voluntary. Registration is completed upon entry of a personal password; you can subsequently use this password and your access data to register for and use the system at any time.

When you register, a candidate profile is created for you.

You can delete your candidate profile at any time; doing so will delete all data that you have made available to Schaeffler via the recruiting system with effect for the future at Schaeffler.

To prevent any conflicts with your current employer, please use only private e-mail addresses for registration.

1.2. Applying for a specific position

Beyond the information listed above, you must also state further relevant information when applying for specific positions; in this case, the information in question will be requested specifically via an input screen. By agreeing to this data privacy statement, you confirm that the data you have placed at our disposal have been entered truthfully, completely, and to the best of your knowledge. We reserve the right to request the submission of original documents (e.g. of references) during subsequent proceedings.

The employees who are responsible for recruiting and for the individual job advertisement at Schaeffler will not see your data until you “send” your application. You can use your login to check the status of your application, withdraw applications that you have already sent, or delete applications that you have not yet sent. You will still be able to access withdrawn applications via your login.
Please note that, when applying for positions outside the European Union, you may be asked to provide different or additional data, which are permissible or even mandatory according to the laws that apply in the respective country. By entering your data, you agree to the storage and further processing of these data, and in particular to the forwarding of your data to employees who are responsible for recruiting and for the individual job advertisement at the relevant overseas Schaeffler entity.

Your data will only be forwarded to the employees who are responsible for recruiting and for the individual job advertisement in the relevant countries.

In addition, main administrators can access your data to perform system maintenance and to ensure data protection.

1.3. Candidate profile activation for the global candidate pool
By activating your candidate profile for our global candidate pool, you make your personal data available to the Schaeffler Group employees responsible for recruiting for the purpose of finding a position beyond the scope of an individual application, and thus declare your willingness to change.

By activating your profile for our global candidate pool, you give your consent for Schaeffler to contact you using the contact data you have provided with regard to relevant job opportunities.

You can withdraw your consent at any time by blocking or deleting your candidate profile.

2. Legal basis for data processing
The processing of your personal data takes place on the basis of the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG). If you have consented to the processing of your personal data for specific purposes, article 6, paragraph 1a of the GDPR serves as the legal basis for the processing of these personal data. You can revoke a declaration of consent at any time. Please note that this revocation only applies for the future. Data processing that took place prior to the revocation remains unaffected.

The processing of personal data as part of the fulfillment of contracts in which you are one of the contractual parties or for the purpose of carrying out pre-contractual measures at your request takes place on the basis of article 6, paragraph 1b of the GDPR. The purpose of data processing is dependent on the respective contract documents and the object of the contract. In particular, this means that your personal data will be processed for the purpose of justifying (e.g. as part of the application process), implementing, or terminating your employment relationship with Schaeffler on the basis of § 26 of the BDSG. This processing can also take place on the basis of a collective agreement.

If the processing of personal data is required in order for a legal obligation to be fulfilled to which our company is subject, article 6, paragraph 1c of the GDPR serves as the legal basis for this to take place.

If the processing of data is necessary in order to protect a legitimate interest of Schaeffler or a third party (e.g. for the assertion of legal claims and defense in the event of legal disputes, in order to ensure IT security, to prevent crimes, for business steering measures and in order to further develop products and services) and your interests and your fundamental rights and freedoms as an affected party do not outweigh the former interest, article 6, paragraph 1f of the GDPR serves as the legal basis for this to take place.
3. **Processed data categories**  
We process the following data or data categories provided by you in particular:

- Personal data (e.g. your date of birth)
- Contact data (e.g. your telephone number)
- Data relating to your training
- Professional experience
- Qualifications and expertise

4. **Data deletion and storage period**  
We will process and store your personal data for as long as this is necessary for the respective purpose. If your data are no longer required, they will be deleted regularly, unless legal obligations to preserve records prevent this deletion.

In detail, the following applies:

1) **Candidate profile:** Your candidate profile and all data provided (e.g. appendices) are deleted six months after registration if you do not log into your candidate profile, make any applications, or update your data during this period.

2) **Application:** Data that are entered and/or uploaded in relation to an application are deleted six months after the position has been filled. The boundary conditions as described under point 1) otherwise apply.

You will be notified of the deletion of your data via e-mail.

It is not possible for the candidate profiles of internal employees to be completely deleted. Employees can delete or correct data that they themselves entered at any time. However, the existing candidate profile is maintained. Applications are deleted six months after the respective position has been filled.

5. **Access to personal data within the Schaeffler Group and by third parties**  
Within the Schaeffler Group, your data are accessible to those parties who require access to them according to the “Least Privilege” principle (assignment of rights of use in the smallest possible scope) and the need-to-know principle (knowledge of data only when required). We are only authorized to forward data to recipients if this is necessary, it is required by law, you have given your consent, or processors commissioned by us have contractually committed to observing the specifications of the GDPR and the German Federal Data Protection Act (BDSG).

Under these prerequisites, recipients of personal data as part of the application process can include the following: Internal specialist departments with responsibility, IT administrators, and external service providers (if necessary).

6. **Transfer of personal data to third-party countries or international organizations**  
The transfer of data to countries outside of the EU/EEA (so-called “third-party countries”) only takes place when necessary or legally proscribed, when you have given us your consent, or as part of the processing of an order. If service providers in third-party countries are employed, they are obliged to confirm that they will observe the European level of data security by agreeing in writing to the EU’s standard contractual clauses.
7. **IT security**
The Schaeffler Group applies technical and organizational security measures in order to protect your data as administered by us against accidental or intentional destruction, manipulation, loss, or access by unauthorized persons. These security measures are under continuous development in line with the new technical possibilities available at the time.

8. **Obligation to provide personal data**
The use of the E-Recruiting system is voluntary. However, in order for the system to be used, it is necessary for the data that are marked as mandatory entries (“basic data”) to be provided as part of the registration process.
If you wish to make use of application options that are available in the system, you must also provide additional data beyond the scope of the basic data; these will be requested individually.

9. **“Profiling” and automated decision-making**
We do not use any fully automated decision-making systems in accordance with article 22 of the GDPR. Schaeffler generally does not use “profiling”. Should we use such systems in individual cases, we will inform you of this separately provided that this is legally required and request your consent in advance if required.

10. **Sources of your personal data**
We utilize data that we receive from you yourself.
For internal employee applications, we additionally receive excerpts from the employees’ SAP master data (e.g. name, address, and date of birth).

11. **Protection of children**
Protecting children and their privacy is of particular importance to us. We therefore record, process, and utilize the information and data of persons whom we know to be under 16 years of age only with the consent of their parents or legal guardians.
On request, legal representatives can view the information that we have at our disposal and ask for this to be deleted.

12. **Your rights as a data subject**
If your personal data are processed, you are a data subject according to the terms of the GDPR and you have the following rights with regard to us as the responsible party:

12.1 **Right to information (art. 15 of the GDPR)**
You can request confirmation from us as to whether we are processing personal data relating to you. If such processing is taking place, you can request information from us regarding the legally stipulated information (refer to article 15, paragraph 1 of the GDPR) and notification via suitable guarantees according to article 46 of the GDPR that relate to the transfer of data if personal data relating to you are transferred to a third-party country or to an international organization. The restrictions specified in §§ 34 and 35 of the BDSG apply.

12.2 **Right to correction (art. 16 of the GDPR)**
You have the right to the correction and/or supplementation of personal data processed by us, provided that these data are incorrect or incomplete. We are obliged to carry out this correction without delay.
12.3 Right to restriction of processing (art. 18 of the GDPR)
Under the legal prerequisites (refer to article 18, paragraph 1 of the GDPR), you can request the restriction of the processing of personal data relating to you. Please refer to article 18, paragraphs 2 and 3 of the GDPR with regard to the consequences this restriction may have.

12.4 Right to deletion (art. 17 of the GDPR)
You can request that we immediately delete such personal data as relate to you; we are then obliged to delete these data without delay provided that there is a reason for this in accordance with article 17, paragraph 1 of the GDPR. No right to deletion exists in the cases described in article 17, paragraph 3 of the GDPR. The restrictions specified in §§ 34 and 35 of the BDSG also apply.

12.5 Right to notification
If you have asserted the right to correction, deletion, or restriction of processing by us, we are obliged to notify all recipients to whom your personal data were disclosed of this correction or deletion of data or of the restriction of processing, unless this proves to be impossible or entails a disproportionately large work outlay. You have the right to notification by us regarding these recipients.

12.6 Right to data portability (art. 20 of the GDPR)
You have the right to obtain any personal data relating to you that you have placed at our disposal in a structured, commonly-used, and machine-readable format. For details, please refer to article 20 of the GDPR.

12.7 Right to object (art. 21 of the GDPR)
You have the right to object at any time to the processing of personal data relating to you based on article 6, point e) or f) of the GDPR for reasons arising from your particular situation. For further details, refer to article 21 of the GDPR.

You additionally have the right to complain to the supervisory authority for data protection according to article 77 of the GDPR in conjunction with § 19 of the German Federal Data Protection Act / BDSG.

13. Name and address of the responsible party
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Industriestraße 1-3
91074 Herzogenaurach (Germany)

Phone: +49 9132 82-0
Fax: +49 9132 82-49 50
E-mail: info.de@schaeffler.com

14. Address of the data protection officer
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91074 Herzogenaurach (Germany)

Phone: +49 9132 82 1476
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E-mail: datenschutz@schaeffler.com
Information on the use of cookies in the recruiting system can be found in the [cookie policy](#).