

## **Privacy policy for online applications at cargo-partner**

### **Name and contact details of the “data controller”**

cargo-partner GmbH is a company that manages human resources for all cargo-partner group of companies and organizations and provides a centralized platform for online applications for all countries where cargo-partner is present. cargo-partner GmbH is thus responsible for this platform.

The company responsible as “data controller” for processing the application data for the application process is cargo-partner GmbH (Airportstrasse 9, 2401 Fischamend, Austria). This applies to all group companies of the cargo-partner group.

This privacy policy refers to personal data collected by cargo-partner during the recruitment process.

For us, cargo-partner, the security and confidentiality of your personal data is very important. As such, we will take all necessary measures to ensure the security and confidentiality of the processed personal data, in order to process the personal data according to the applicable legal provisions and exclusively for the purposes specified below.

### **Personal data we process**

For submitting your application, cargo-partner has implemented the application tool of Lever Inc, referred to above as the “data processor“ which gives you the opportunity online to submit your application electronically for a position in cargo-partner or one of the group companies of cargo-partner \* via this platform on the website: <https://jobs.lever.co/cargo-partner>

In order to implement the recruitment process, including in order to conclude the relevant contract, if you are selected, we will collect from you the following personal data:

- Identification data: full name, date of birth, gender, domicile/residence, citizenship, home address;
- Contact data: telephone address and e-mail address;
- Data regarding education and obtained qualifications;
- Data regarding the previous professional experience;
- Language skills
- Data resulted from the selection process data provided by the Thomas test and the Personnel Questionnaire, including your handwriting or signature, which may be analyzed;
- Additional data voluntarily provided by you in the CV or during the interview in order to conclude the individual employment contract (e.g. photography, hobbies, data on holding a driver’s license, residence permit, residence registration certificate, marital status, etc.).

Also, in case of scheduling an interview at the headquarters of cargo-partner GmbH or at any other locations in the cargo-partner company’s group, in the areas under surveillance by CCTV systems we collect video images of you.

If you are under the age of 16, please enclose a written consent from your parent or legal guardian to your application. Please note that if this condition is not met, cargo-partner cannot consider your application and will delete your data due to legal requirements.

## **How we collect your personal data**

We collect the personal data you voluntarily provide to us during the recruitment process. It is communicated by you, directly, via the platform on the website <https://jobs.lever.co/cargo-partner>. We can collect your personal data offline through the Human resources department, by written correspondence or e-mail ([talent.acquisition@cargo-partner.com](mailto:talent.acquisition@cargo-partner.com)), verbally or by telephone. All the contact information you can find it at: <https://cargo-partner.com/contact/>.

Sometimes, we may collect personal data that concern you also by specialized recruitment websites or other specialized agencies, if you have applied to a position and posted on such a website or published in another manner by such an agency or you have published your CV on such a website.

Also, video images are automatically collected by CCTV system and stored in accordance with the specific national law in each country.

Your personal data is necessary for us in order to implement the recruitment process, and you cannot participate in this process without providing this data.

### ***Data collected from LinkedIn & Xing***

If you have a professional profile on LinkedIn or Xing, the input screen gives you the option to transmit data required for the application from your professional profile to cargo-partner. This means that manual collection of master data via the input screen will only be partially necessary. Your applicant profile will be created on transmission of master data from LinkedIn and/or Xing.

As well as the master data, additional data such as; current employer, current position, may be transferred from your profile at LinkedIn or Xing. Such data is generally not required to create a profile in our data processor, yet still may be transmitted based on your profile settings. The providers of LinkedIn and Xing are the data controllers in these cases, not cargo-partner. For this reason, please check your professional profile settings prior to submission to determine which personal data is affected. You have the possibility to adjust, rectify and delete your data at any time using the consent links and applicant profiles.

The legal basis for the transmission of your master data and additional data from LinkedIn or Xing is provided by Art. 6 § 1 a) GDPR, Consent given to the providers.

Please refer to the Privacy policies of LinkedIn & Xing respectively below:

LinkedIn: <https://www.linkedin.com/legal/privacy-policy?trk=uno-reg-guest-home-privacy-policy>

Xing: <https://privacy.xing.com/en/privacy-policy>

## **Processing purposes and legal grounds**

The personal data that concerns you is processed exclusively for the purposes specified in this Privacy Policy and only based on processing legal grounds, specified by the applicable legal provisions regarding the protection of personal data:

- (i) Your personal data shall be processed in order to execute the recruitment process, in order to make endeavors, upon your request, before and in view of concluding the individual employment contract or another agreement with similar effects, in order to meet the legal conditions for occupying the position for which you apply (including references from your previous employers and creating your psychological profile using the data provided by you in the Thomas Test, in the Personnel Questionnaire and your handwriting ).

**Legal ground for this processing is art. 6 par. 1 let. b) of EU General Data Protection Regulation (GDPR)-performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.**

- (ii) Your data may be used in order to verify the compliance with the legal obligations regarding the hiring process in specific country where the position is opened.

**Legal grounds for this processing is art. 6 par. 1 let. c) of EU General Data Protection Regulation (GDPR)-compliance with a legal obligation to which the controller is subject.**

- (iii) Your data may be used in order to defend the company against any complaints filed by candidates.

**Legal grounds for this processing is art. 6 par. 1 let. f) of EU General Data Protection Regulation (GDPR)-legitimate interest pursued by the controller – fight against discrimination claims of the applicants ( dependent on the statute of limitation determined in the respective national laws, e.g. Austria- 6 months, Slovakia- 3 years, Romania- 1 year etc. ).**

- (iv) The video images collected by the CCTV system is used for protection against criminality.

**Legal grounds for this processing is art. 6 par. 1 let. f) of EU General Data Protection Regulation (GDPR)-legitimate interest pursued by the controller- protection against criminality.**

- (v) Your personal data may be processed in a candidate pool for future recruitment in which you may be interested, only if you provide an express consent for this purpose.

**Legal grounds for this processing is art. 6 par. 1 let. a) of Regulation 679/2016-given consent to the processing.**

- (vi) Data is processed for reporting or statistical purposes. This processing is done anonymously, therefore no identification or conclusion about the individual personal data are possible.

**Legal grounds for this processing is art. 6 par. 1 let. f) of EU General Data Protection Regulation (GDPR)- legitimate interest pursued by the controller- commercial interest.**

You are entitled to know the purpose for which we process your personal data. We will inform you before processing your data for any other purpose.

Moreover, we shall adequately protect your interests, rights and liberties. Personal data is stored in a secured location, and is protected in transit. The data that is no longer for achieving the purpose is anonymized.

**Storage duration**

Your personal data will be stored during the entire duration in which the recruitment process is implemented, and for another 2 years if you have provided your consent for its storage in the candidate pool.

Your data is stored for a period determined by specific national law in order to defend the company against any complaints filed by candidates ( fight against discrimination claims. e.g. Austria- 6 months, Romania- 1 year etc. ).

The video images of you will be stored for a period determined by specific national law or regulation, and shall be automatically deleted after the expiry of this period.

If the storage of personal data is necessary in virtue of express national legal provisions, we may continue to store your personal data, in the period provided by those national legal provisions.

**Recipients of the personal data**

Your data may be sent to the management of the company, to the providers of support services, the companies that are members of the Cargo Partner group, and to the state authorities, where applicable. We would like to mention that cargo-partner has concluded with these service providers contracts that comprise mandatory clauses on ensuring the security, integrity and confidentiality of your personal data.

You shall be notified regarding any future disclosure of your personal data to any new addressee (a private natural person or legal entity, a public authority or any other body), unless such a transfer or disclosure is expressly provided by the European Union law or national law.

A list of processors and information about them is below:

**Data Processor:**

**Services Provided**

Lever (San Francisco, CA, USA)

Used for Applicant tracking system (ATS) services

Lever privacy policy can be found here: <https://www.lever.co/privacy-policy>

Elisabeth Charkow (Wien, AT)  
[www.diegraphologin.at](http://www.diegraphologin.at)

Used for handwriting and / or graphology analysis.

Thomas International UK Ltd (Buckinghamshire, UK) Used for Thomas International Test

<b>Sub-processor (Location)</b>	<b>Services Provided</b>
Amazon Web Services (Portland, Oregon)	Used for Cloud Data Warehousing services for the Lever Platforms
Mailgun (San Francisco, CA)	Used to receive and send emails on the Lever Platforms
Nylas (San Francisco, CA)	Used to support email integration for customers on Microsoft Exchange

cargo-partner entities are listed and described below:

(i) the Multi Transport und Logistik Holding AG as the global HR-management center;

(ii) cargo-partner d.o.o., Croatia, as the regional HR-management center;

(iii) one of the affiliates of the companies of the cargo-partner group marked with “\*\*” below or above, as your potential employer and local HR-management center:

company	country / city
Multi Transport und Logistik Holding AG	Fischamend/Austria
cargo-partner GmbH	Fischamend/Austria
Safer Overseas Transport Holding GmbH	Fischamend/Austria
Consoltainer Line Transport GmbH	Fischamend/Austria
W-Trans Speditions Gesellschaft m.b.H.	Austria
Cargo-Partner GND GmbH	Fischamend/Austria
cargo-partner SCM solutions GmbH	Fischamend/Austria
iLOGISTICS IT HOLDING GMBH	Fischamend/Austria
SPOTWORX GmbH	Fischamend/Austria
iLogistics IT Solutions GmbH	Fischamend/Austria
cargo-partner SR, S.r.o.	Bratislava/Slovakia
cargo-partner Hungaria Fuvarszervezesi Kft.	Budapest/Hungary
cargo-partner CR s.r.o.	Prague/Czech Republic
cargo-partner Spedycja Sp.z.o.o.	Warsaw/Poland
cargo-partner Network B.V.	Rotterdam/Netherlands
cargo-partner ApS	Kopenhagen/Denmark
cargo-partner d.o.o. Beograd	Belgrade/Serbia
cargo-partner bvba	Bruxelles/Belgium
cargo-partner d.o.o.	Zagreb/Croatia
cargo-partner d.o.o.	Brnik/Slovenia
cargo-partner Expeditii s.r.l.	Bucharest/Romania

cargo-partner d.o.o. Sarajevo	Sarajevo/Bosnia
CPN cargo-partner Network AB	Stockholm/Sweden
cargo-partner EOOD	Sofia/Bulgaria
CPN CARGO-PARTNER NETWORK LIMITED	Dublin/Ireland
cargo-partner GmbH	Hallbergmoos/Germany
cargo-partner Oy	Helsinki/Finland
cargo-partner s.r.l.	Como/Italy
Cargo Partner Network Inc.	New York/USA
Cargo-partner US Holdings Inc.	Wilmington/USA
cargo-partner Logistics Ltd.	Taipei/Taiwan
cargo-partner Logistics Ltd.	Bangkok/Thailand
CP Logistics Ltd.	Bangkok/Thailand
cargo-partner Logistics India Pvt Ltd	India
cargo-partner Asia Pacific Ltd.	Hong Kong
cargo-partner Logistics Limited	Hong Kong
cargo-partner Logistics (China) Ltd.	Shanghai/China
cargo-partner Logistics PTE. LTD.	Singapore
cargo-partner Logistics (private) limited	Colombo/Sri Lanka
cargo-partner Co, ltd.	Korea
cargo-partner Logistics Co. LTD.	Vietnam
CP Logistics Ltd	Bangladesh
Cargo Partner Network SDN BHD	Malaysia
Cargo Partner Nakliyat ve Lojistik A.S.	Istanbul/Turkey
cargo-partner Logistics Pty Ltd	Melbourne / Australia

### **Transfer of personal data to third countries or international organizations**

If personal data will be transferred to third countries or international organizations, the data controller will sign a data processing agreement to secure and protect your rights to data privacy mandatory including standard contractual clauses for international data transfer given by European Commission. Lever Inc and cargo-partner GmbH have signed a data processing agreement to secure and protect your rights to data privacy.

Companies within the cargo-partner Group located in third countries and cargo-partner GmbH have signed the data processing agreement to secure and protect your rights to data privacy.

### **Personal data security**

For us, cargo-partner, the security, integrity and confidentiality of your personal data are very important. We have applied technical and organizational measures to secure our data processing which are reviewed and adapted regularly. This relates in particular to the processing and protection of your personal data. We shall protect your data against unauthorized or unlawful processing, unintentional loss, unintentional destruction or unintentional damage. These measures include but not limited to:

1. Access control of our data processor. Only human resources colleagues and hiring manager(s) have access to the specific job you are in consideration for. Processes in place to prevent unauthorized persons from gaining access to our data processor (namely telephones, database, internet use, access rights, login log, and applications servers).
2. Protection of the site where the data is stored at our data processor and third party sub-contractors:
  - a. Established security areas;
  - b. Protection and restriction of access paths;
  - c. Secure data processing, equipment and personal computers;
  - d. Established access authorization for employees and third parties, including respective authorization;
  - e. All access to data centres where personal data is hosted is logged, monitored and tracked;
  - f. Data centres where personal data is hosted are secured by a security alarm system, and other appropriate security measures.
3. Access Control to Data Processing Systems. Processes to prevent Lever data processing systems from being used by unauthorized persons, to include:
  - a. identification of the terminal and/or the terminal user to the data processor systems;
  - b. automatic time-out of user terminal if left idle, identification and password required to reopen;
  - c. regular examination of security risks by internal personnel and qualified third-parties;
  - d. issuing and safeguarding of identification codes;
  - e. password complexity requirements (minimum length, expiry of passwords, etc.); and
  - f. protection against external access by means of firewall and network access controls.

## **Data processing "Use of cookies"**

### Cookies

When you access the platform, technical information is stored on your device in the form of a cookie. We only use essential cookies at <https://jobs.lever.co/cargo-partner>. The categories of cookies in connection with the platform <https://jobs.lever.co/cargo-partner> are described below.

### Business necessary cookies

We use cookies that are essential for the operation of the platform, services, applications and tools. These include technologies that allow you to access the Website and the tools required to verify the functionality of the Site, prevent fraud, and improve security. This includes the "RequestVerificationToken" cookie used. These cookies are essential for you to use the services of the platform. Without these cookies, the services would not work correctly. However, these cookies are stored only as long as necessary for this service, i.e. usually until the end of the Internet session and until you close your browser completely (session cookies).

### Functional cookies

In addition, we use cookies that allow, for example, to save information already entered and to adapt the website to your individual settings (e.g. language selection). Such cookies are retained even after the Internet session is canceled (persistent cookies) and are available when you return to the website. These cookies improve your use of the website.

### Performance cookies

We use analytical cookies to analyze how the platform is used and to monitor the performance of the website. This makes it possible to easily apply for a job by tailoring the offer and to quickly identify and

resolve any problems that occur. However, the information collected by these cookies does not allow any conclusions to be drawn about your identity.

## Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website will be transmitted to and stored by Google on servers in the United States.

In case IP-anonymisation is activated on this website, your IP address will be truncated within the area of Member States of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases the whole IP address will be first transferred to a Google server in the USA and truncated there. The IP-anonymisation is active on this website.

Google will use this information on behalf of the operator of this website for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing them other services relating to website activity and internet usage.

The IP-address, that your Browser conveys within the scope of Google Analytics, will not be associated with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also opt-out from being tracked by Google Analytics with effect for the future by downloading and installing Google Analytics Opt-out Browser Addon for your current web browser: <http://tools.google.com/dlpage/gaoptout?hl=en>.

## Know your rights

You have the following rights regarding the processing of your personal data:

- (1) the right of access to your personal data: You have the right to request the access to the personal data that concerns you and which is processed by cargo-partner;
- (2) the right to obtain the rectification or deletion of your personal data: You have the right to request the rectification of incorrect, incomplete or non-updated data, and to delete your personal data, for example, if the continued processing is not necessary or is illegal when you withdraw your consent for processing the data for which you previously consented. Personal data which is stored according to legal provisions cannot be deleted.
- (3) the right to obtain restrictions to the processing of personal data: In the situations provided by the law, you may request restrictions to the processing of your personal data;
- (4) the right to the portability of your personal data: You may request the transmission, either to you, or to another data operator, of a copy of the personal data which cargo-partner processes regarding you;



- (5) the right to object to the processing of your personal data: You may exercise this right in relation to personal data if it is processed in virtue of legitimate interests, public interests or if used for profiling;
- (6) Your right to withdraw your consent regarding the processing of your data stored in the applicant pool, a withdrawal which may be expressed at any time and which causes the removal of your personal data from our applicants pool as soon as possible, but no later than 30 days.

### **Exercise your rights**

If you have any questions regarding the processing of your personal data or if you wish to send us any requests, or to exercise any of your rights regarding the processing of personal data, please contact us at the following e-mail address: [dataprotectionoffice@cargo-partner.com](mailto:dataprotectionoffice@cargo-partner.com), phone: +43 5-9888-0. You may also contact us at our headquarter of cargo-partner GmbH Airportstraße 9, Fischamend, A-2401, Austria.

We shall analyze each request as soon as possible, but no later than one month. If we need further information from you or we have difficulties in resolving your request, we will immediately inform you that we need more time to adequately analyze your request.

Supervisory Authority. Notwithstanding the possibility of bringing an action before the Regional Court pursuant to Section 29 (2) of the Data Protection Act 2018 and any other remedies, the right of appeal to the national supervisory authority at your place of residence exists if unlawful processing of personal data is assumed. In Austria, the Austrian data protection authority based at Wickenburggasse 8, 1080 Vienna is responsible. You are entitled to contact the data protection authority in the state of your residence, place of work or place of the alleged infringement of GDPR as well.

Any modification of the information comprised in this Privacy policy will be uploaded on [https://cargo-partner.com/fileadmin/public/Legal\\_Downloads/Privacy-policy-for-applications.pdf](https://cargo-partner.com/fileadmin/public/Legal_Downloads/Privacy-policy-for-applications.pdf). No modification of the privacy policy shall affect the rights granted to you by the law.

Thank you for entrusting your personal data to us and for dedicating the necessary time for reading the information regarding the manner in which we process it. Please, do not hesitate to contact us for any questions you may have.

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