Data protection information - Application Process

We are delighted that you are interested in applying for a position with us at Weber-Stephen. This data protection information describes how Weber-Stephen companies established in the Asia Pacific region process your personal data during your application process in compliance with the applicable European data protection regulations.

Please note further information on processing of your personal data in the individual job advertisements.

I. Controller for the processing of your personal data, Contact Information of the Data Protection Officer

1. Controllers

The controller of the processing of personal data in the context of the application process is the Weber-Stephen group company, which is named in the job description as the hiring entity. Within the Weber-Stephen Group, some tasks and services are performed on a collaborative basis. If, in your specific case, the purposes and means of processing your personal data are determined jointly by the hiring company and other group companies, we will inform you separately about the joint controllers involved. Contact details of all Weber-Stephen companies that may process your data as controllers during the application process can be found in **Annex 1**.

If you are applying for or interested in a position with a Weber-Stephen company based in the Asia Pacific region, you can direct any data protection enquiries and claims under data protection law to our joint privacy management department. You can reach it at hr_apac@weber.com

Please indicate which Weber-Stephen company you have applied to. In the case of joint controllership, this department also serves as the joint point of contact. However, you may assert your rights under data protection law in respect of and against each of the controllers.

2. Data protection officer

The data protection officer of Weber-Stephen in Asia can be reached at hr_apac@weber.com

II. Purposes of processing, legal basis, categories of personal data

1. Review of the application

a. General purposes of processing and categories of data processed

We process the data that you have submitted with your application to us in order to review your suitability for the position and to carry out the application process. This also applies to information added during the course of the application process, for example from follow-up queries and subsequently submitted documents. In addition, we process the information provided in the application process, e.g. in telephone interviews, personal interviews or during a visit to a job fair. In individual cases, we may organize and conduct assessment centers (tests and selection interviews) in order to specifically check your suitability for the advertised position, about which we will inform you separately.

We generally process the following categories of data as part of the application process:

- Basic identification data (surname, first name, date of birth);
- Contact details (address, telephone number, e-mail address, etc.);
- Application data such as CV, cover letter, photo, certificates, letters of recommendation and other information and data that you provide to us in addition and share with us in job interviews

- Nationality, work permit, data on health suitability;
- If you wish to make use of special rights for severely disabled persons in the application process, you can indicate your severe disability.

Upon receipt of your application, your application data will be reviewed. Suitable applications will then be made available internally to the hiring department managers responsible for the respective vacant position in order to assess the extent to which you are suitable for the position concerned.

Your application data will be passed to other companies only, if a HR department and/or a hiring manager of another group company is responsible and/or if the advertised position has group-wide dimensions (especially Asia-wide or global positions) or if you have consented to the transfer in connection with our talent pool (see section 7).

In addition, if applicable, the representative for severely disabled employees may also be involved in filling vacancies. Access is limited to the extent required by law.

b. Legal basis

The legal basis for the processing of personal information during the recruitment and application process is primarily the Act on the Protection of Personal Information of Japan ("APPI"). Personal information is handled in accordance with the APPI and related guidelines issued by the Personal Information Protection Commission.

Personal information may be processed to the extent necessary for the conclusion or performance of an employment contract, including the assessment of suitability for employment and related recruitment decision-making.

In addition, personal information may be processed where necessary for the legitimate business interests of the Company, such as improving and optimizing recruitment processes, ensuring efficient candidate management, and obtaining information relevant to the assessment of applicants for the position in question. Where required under applicable Japanese law, such processing will be conducted in a lawful and fair manner and limited to the scope necessary for the stated purposes.

Furthermore, personal information may be processed where required to comply with legal obligations under applicable laws and regulations.

Where sensitive personal information is handled, such information will be processed only to the extent necessary for compliance with labor-related laws, social security requirements, or other applicable legal obligations, and in accordance with the APPI's stricter requirements for such information.

For certain positions, a medical examination may be required as part of the recruitment process. In such cases, only the result indicating whether the applicant is fit or unfit for the position will be obtained and processed, and only to the extent necessary for employment assessment purposes, in accordance with applicable laws and regulations.

c. Third country transfers within Weber-Stephen group

Where personal information is transferred between Weber-Stephen group companies located in Japan and group companies located overseas, such transfers will be carried out in accordance with the Act on the Protection of Personal Information of Japan ("APPI") and related guidelines issued by the Personal Information Protection Commission.

When personal information is transferred to countries or regions outside Japan, the Company will take appropriate measures as required under the APPI to ensure the protection of personal information, including implementing necessary and appropriate supervision of the overseas recipient, and, where required, providing information to data subjects regarding the foreign country's personal information protection system and the measures taken by the recipient.

In particular, where personal information is transferred to group companies or service providers located in countries that are recognized as having a data protection system equivalent to Japan's standards, such transfers may be permitted based on such adequacy recognition under applicable Japanese regulations.

Where appropriate, the Company may also rely on contractual safeguards and internal group policies to ensure that transferred personal information is handled in a manner consistent with the protection standards required under the APPI.

Adequacy recognition and other transfer mechanisms establish that an appropriate level of protection for personal information is ensured in the destination country or region, and that the handling of personal information complies with applicable Japanese legal requirements.

2. Pre-Employment Screening ("PES" or background checks)

In certain cases, particularly where the position applied for involves access to highly confidential information or significant personal and/or financial responsibility, it may be necessary to conduct enhanced screening and assessment of applicants for purposes such as fraud prevention, protection of the Company's reputation and proprietary know-how, information security, and compliance with applicable legal and regulatory requirements.

Such additional screening and processing of personal information will only be carried out at the later stage of the recruitment process. Where your application is subject to such additional screening, you will be informed separately in advance regarding the scope and purpose of the processing. Where required under applicable law, your consent will be obtained before such processing is conducted. You may refuse or withdraw consent to such processing at any time; however, this may affect the Company's ability to continue considering your application for the relevant position.

The purposes of such processing may include:

- objective assessment of qualifications to ensure selection of the most suitable candidate;
- prevention of fraud and misconduct;
- review and interpretation of foreign-language documents and qualifications;
- protection of information security, confidential information, reputation, and technical expertise;
- reduction of legal and operational risks;
- verification of reliability for candidates applying to management or high-responsibility roles; and
- compliance with applicable legal, regulatory, and international compliance requirements.

All processing will be conducted in accordance with the Act on the Protection of Personal Information of Japan ("APPI") and related guidelines, and appropriate security measures will be implemented to protect personal information.

3. Terror and sanctions lists check

Names and dates of birth of applicants may be screened against applicable sanctions lists and other restricted-party lists, including but not limited to anti-corruption, watch lists, terrorism-related lists, embargo lists, and other compliance-related databases, where required under applicable laws, regulations, and internal compliance policies.

In the event of a potential match, relevant application data may be retained and further reviewed as necessary for compliance purposes.

Such processing is carried out for purposes including protecting the Company's assets, confidential information, and business interests, as well as ensuring compliance with applicable legal and regulatory obligations. Where required under applicable laws and regulations, such screening may also be conducted to comply with sanctions, export control, anti-money laundering, anti-corruption, and related regulatory requirements.

All processing of personal information will be conducted in accordance with the Act on the Protection of Personal Information of Japan (“APPI”) and related guidelines. Appropriate security and organizational measures will be implemented to ensure that personal information is handled securely and only to the extent necessary for the stated purposes.

4. Reimbursement of travel expenses

Where travel expenses incurred during the recruitment process are reimbursed by Weber-Stephen, the Company may process personal information as necessary for the administration, verification, settlement, and accounting of such expenses.

Such processing will be carried out in accordance with the Act on the Protection of Personal Information of Japan (“APPI”) and other applicable laws and regulations, including tax, accounting, and recordkeeping requirements.

The processing of personal information in this context is limited to what is necessary for the proper handling of reimbursement requests, payment processing, and related documentation, and appropriate measures will be implemented to ensure the security and proper management of personal information.

5. Management of applications

If your application is successful, a member of the HR team may create a profile for you in the Company’s human resources management system, such as SAP SuccessFactors, for the purpose of preparing employment contract documents and supporting onboarding processes. The system may also be used by the HR team and employees during the course of employment for human resources administration purposes.

The processing of personal information for these purposes will be carried out in accordance with the Act on the Protection of Personal Information of Japan (“APPI”) and related guidelines. Such processing is limited to what is necessary for recruitment, onboarding, and employment management purposes, including the efficient administration and centralization of employment-related documents.

If an employment relationship is established, the personal information provided during the application process, as well as any pre-employment screening results (where applicable), may be transferred to and stored in your personnel file for purposes related to the establishment, management, and performance of the employment relationship. Additional documents or information may also be requested where necessary, and you will be informed separately of any additional processing at the time of collection.

SAP, as the system provider, processes personal information strictly on behalf of the Company and in accordance with its instructions. Where SAP engages subcontractors or affiliated entities located outside Japan, appropriate measures will be taken in accordance with the APPI’s requirements for cross-border data transfers, including ensuring necessary supervision of such service providers and implementing appropriate safeguards to protect personal information.

6. Legal defense and enforcement of legal claims

Personal information of applicants who are not hired will generally be deleted within approximately six months after the completion of the recruitment process, based on the Company’s legitimate interests in responding to, defending against, and managing potential legal claims, unless a longer retention period is required or permitted under applicable laws and regulations, or where you have consented to extended storage.

If you withdraw your application, your application documents will be deleted without undue delay, unless retention is necessary to comply with applicable legal, regulatory, dispute resolution, or recordkeeping obligations.

For a period of up to six months after the end of the recruitment process, the Company may retain a record of your withdrawal of application for the purpose of managing and defending against potential legal claims.

For the purposes described above, your personal information may also be shared with external professional advisers, such as tax advisors, legal counsel, auditors, or certified public accountants, where necessary and in accordance with applicable laws and confidentiality obligations.

All processing, retention, and transfer of personal information will be carried out in accordance with the Act on the Protection of Personal Information of Japan ("APPI") and related guidelines, with appropriate safeguards in place to ensure the security and proper handling of personal information.

7. Talent pool

With your consent, your application data may be included in the Company's talent pool so that you may be considered for future job opportunities. In addition to the group company to which you originally applied, relevant HR departments and hiring managers from other group companies may access your application data for the purposes described above, provided that this is covered by your consent.

Where required under applicable laws and regulations, your consent serves as the legal basis for storing and using your personal information in the talent pool. You may withdraw your consent at any time with effect for the future. If you withdraw your consent, your personal information will be removed from the talent pool without undue delay. In any event, data stored in the talent pool will not be retained for longer than three years, unless otherwise required or permitted by applicable laws and regulations.

Where personal information is transferred to group companies located outside Japan, such transfers will be conducted in accordance with the Act on the Protection of Personal Information of Japan ("APPI") and related guidelines. Where required, we will obtain your consent for such cross-border transfers and implement appropriate safeguards to ensure the protection of your personal information in accordance with applicable legal requirements.

8. Reporting

In order to improve the efficiency of recruitment activities and vacancy advertising, we may collect certain voluntarily provided information during the application process, such as how you learned about our job openings. Where required under applicable laws and regulations, the processing of such information is based on your consent. You may withdraw your consent at any time with effect for the future.

In addition, we may process application submission timing information in connection with the title of the advertised position for the purpose of analyzing application volumes per role and the time required to fill vacancies. Any reports generated for these purposes will contain only aggregated statistical data that does not identify any individual applicant.

Such processing will be carried out in accordance with the Act on the Protection of Personal Information of Japan ("APPI") and related guidelines, and will be limited to what is necessary to support the improvement and optimization of recruitment processes. Appropriate safeguards will be implemented to ensure that personal information is protected and cannot be used to identify individuals in the resulting analysis.

III. Recipients of data, third country transfers

Your personal information may be shared with the following categories of recipients where necessary for the purposes described in this policy and in accordance with applicable laws and regulations:

- Other group companies, where the relevant HR department and/or hiring manager is located in another country, or where the advertised position has a group-wide scope (in particular Asia-wide or global positions).
- Service providers acting on behalf of the Company, including providers of cloud-based HR or recruitment systems, recruitment agencies, translation service providers, chambers of commerce and industry, and other third-party service providers engaged to support recruitment processes, including providers performing pre-employment screening (PES) where applicable.
- Relevant authorities, regulatory bodies, and public institutions, where disclosure is required under applicable laws and regulations or necessary to comply with legal obligations or lawful requests, including investigations by law enforcement or prosecuting authorities.

Where personal information is transferred to group companies or service providers located outside Japan, such transfers will be conducted in accordance with the Act on the Protection of Personal Information of Japan ("APPI") and related guidelines. Where required, appropriate safeguards will be implemented, and necessary explanations regarding overseas transfers will be provided in accordance with applicable law.

In addition, personal information may be shared where you have provided consent, or where disclosure is required by law, court order, or other legally binding obligation.

Personal information may also be shared with external professional advisers, such as tax advisors, legal counsel, auditors, or certified public accountants, where necessary for compliance, risk management, or the purposes described in this policy, in accordance with applicable legal requirements.

IV. Origin of the data

Unless otherwise stated, we collect personal information directly from you during the application process.

In order to fill vacancies, we may also conduct searches on professional networking platforms and other publicly accessible sources with a clear professional context to identify suitable candidates. In doing so, we only use information that is publicly available and strictly limited to what is necessary for assessing suitability and establishing initial contact.

We may also receive application-related information from recruitment consultants or recruitment agencies acting on our behalf.

All such collection and processing of personal information will be carried out in accordance with the Act on the Protection of Personal Information of Japan ("APPI") and related guidelines, and will be limited to what is necessary for recruitment purposes, including identifying and contacting suitable candidates for available positions. Appropriate safeguards will be implemented to ensure the proper handling and security of personal information obtained from all sources.

V. No obligation to provide personal data; no automated decision-making

The provision of personal information is neither a statutory nor contractual requirement. However, providing personal information is necessary for participation in the recruitment process. This means that if you do not provide the required personal information when applying, we will not be able to process your application or consider you for current or future employment opportunities.

No automated decision-making, including profiling in the sense of applicable data protection laws, is carried out in relation to the recruitment process. All application assessments are made by human reviewers.

All processing of personal information will be carried out in accordance with the Act on the Protection of Personal Information of Japan ("APPI") and related guidelines, with appropriate safeguards implemented to ensure the security and proper handling of personal information.

VI. Your rights as a "data subject"

Every data subject has the following rights:

- Right to access
- Right to rectification of incorrect data
- Right to erasure
- Right to restriction of processing of personal data
- Right to data portability
- Right to lodge a complaint with a data protection supervisory authority

Under applicable data protection laws, you have the right to request access to, correction of, addition to, deletion of, or suspension of use of your personal information, as well as other rights provided under the Act on the Protection of Personal Information of Japan ("APPI") and related guidelines.

You may also object to the processing of your personal information where such processing is based on legitimate business or legal grounds. Please note that if you object to necessary processing required for the recruitment process, we may not be able to continue processing your application.

Where processing is based on your consent, you have the right to withdraw your consent at any time with effect for the future. Withdrawal of consent does not affect the lawfulness of processing carried out prior to such withdrawal.

To exercise your rights under applicable Japanese laws in relation to Weber-Stephen, please contact our central privacy management department at hr_apac@weber.com

Please indicate which Weber-Stephen company you have applied to. In the case of joint controllership, this department also serves as the joint point of contact. However, you may assert your rights under data protection law in respect of and against each of the controllers.