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 processing personal data during the recruitment and application process is primarily the applicable provisions of the Personal Data Protection Act 2010 of Malaysia ("PDPA"), including where processing is necessary for the conclusion or performance of an employment contract. This allows the processing of personal information that is necessary for decisions related to recruitment and employment.

In addition, personal information may be processed where necessary for legitimate human resources management activities conducted in accordance with lawfully established employment policies and internal rules, or where otherwise permitted under applicable Malaysian data protection laws and regulations. Such purposes generally include improving and optimizing the efficiency of the recruitment process and obtaining additional information relevant to the position applied for. Furthermore, personal information may also be processed where necessary to comply with legal and regulatory obligations under applicable laws of Malaysia.

Where sensitive personal information is processed, such processing will be limited to what is necessary for the fulfillment of obligations or exercise of rights relating to employment, social security, labor protection, or other matters required by applicable laws and regulations. Sensitive personal information will be handled in accordance with the requirements of the PDPA and other applicable regulations, and appropriate protective measures will be implemented.

Certain positions may require a medical examination as part of the hiring process. In such cases, only information regarding whether the applicant is fit or unfit for the relevant position will be received and processed, and such information will be used solely for recruitment and employment assessment purposes in accordance with applicable Malaysian laws and regulations.

c. Third country transfers within Weber-Stephen group

Transfers of personal information between Weber-Stephen group companies established in Malaysia and affiliated Weber-Stephen group companies located outside of Malaysia, including Weber-Stephen Products LLC in the United States, will be carried out in accordance with the applicable requirements of the Personal Data Protection Act 2010 of Malaysia ("PDPA") and other relevant Malaysian laws and regulations governing cross-border data transfers.

Where required under applicable law, appropriate contractual arrangements and data protection measures will be implemented to ensure that transferred personal information receives a level of protection consistent with the standards required under Malaysian data protection laws. Weber-Stephen Products LLC and relevant affiliated entities will implement appropriate technical and organizational measures to safeguard personal information and ensure compliance with applicable data protection and privacy obligations.

Transfers of personal information from entities located in Malaysia to Weber-Stephen group companies located outside of Malaysia, including entities established in US, Switzerland or the United Kingdom such as Weber-Stephen Products UK Limited, will be conducted in accordance with the applicable requirements of the Personal Data Protection Act 2010 of Malaysia ("PDPA") and related regulations governing cross-border transfers of personal information.

Where required under applicable Malaysian laws and regulations, assessments will be conducted to ensure that the overseas recipient provides a level of personal information protection comparable to the standards required under Malaysian law. Appropriate safeguards, contractual arrangements, and security measures will also be implemented to protect personal information during cross-border transfers.

These measures are intended to ensure that personal information transferred outside of Malaysia continues to receive an adequate level of protection and is processed in compliance with applicable data protection and privacy obligations.

Adequacy decisions establish that an adequate level of data protection exists in the country where the data-importing company is established.

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

In certain cases, or if the position for which you are applying involves the performance of highly confidential tasks or personal and/or financial responsibility, it may be necessary to collect and process your data more extensively for the purposes of fraud prevention, the protection of reputation and know-how and the fulfillment of international compliance requirements.

In order to ensure data protection, such additional data processing is based only at the end of the application process. Should the position for which you are applying or your application be affected by such additional data processing, you will be informed separately by us before the start of the PES. You can refuse data processing in the context of PES or object to it at any time. In such a case, however, we may not be able to consider you for the position for which you have applied. The legal basis for the implementation of PES is Personal Data Protection Act 2010 of Malaysia ("PDPA"). The legitimate interests lie in

- the need for an objective examination of qualifications to select the most suitable candidate,
- fraud prevention,
- overcoming language barriers when assessing foreign documents,
- protection of IT security, reputation and expertise,
- the reduction of liability risks,
- proof of the reliability of managers in tendering procedures and
- the fulfilment of international compliance requirements.

3. Terror and sanctions lists check

Names and dates of birth of applicants are checked against relevant sanctions lists, such as anti-corruption lists, watch lists, terror lists and embargo lists. In case of matches application data will be retained. The processing is based on legitimate interests to protect property and business secrets, Personal Data Protection Act 2010 of Malaysia ("PDPA") On the other hand, it may be necessary to carry out a check to fulfill legal obligations, Personal Data Protection Act 2010 of Malaysia ("PDPA")

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 Personal Data Protection Act 2010 of Malaysia ("PDPA") and other applicable laws and regulations, including relevant tax, accounting, and recordkeeping requirements.

The processing is limited to what is necessary for the proper handling of expense reimbursement, payment processing, and related documentation, and appropriate safeguards 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 will 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. The system may also be used by the HR team and the employee during the course of employment for HR administration purposes.

The processing of personal information for these purposes is carried out in accordance with the Personal Data Protection Act 2010 of Malaysia ("PDPA") and other applicable laws and regulations. This processing is based on the necessity of human resources management in connection with the establishment and performance of the employment relationship, as well as the need to ensure an efficient and centralized management of recruitment and employment-related documents in accordance with the principle of data minimization.

If an employment relationship is established, the personal information you provided during the application process, as well as any pre-employment screening (PES) results where applicable, may be transferred to your personnel file and processed for the purpose of managing and performing the employment relationship. You may also be requested to provide additional documents where necessary. You will be informed separately of any further processing of your personal information during the onboarding process.

SAP, as the system provider, processes personal information strictly on behalf of the Company and in accordance with its instructions. Where SAP engages affiliated entities or subprocessors located outside of Malaysia, appropriate safeguards will be implemented in accordance with applicable Malaysian cross-border data transfer requirements under the Personal Data Protection Act 2010 of Malaysia ("PDPA") including contractual and technical protection measures to ensure the security of personal information.

6. Legal defense and enforcement of legal claims

Personal information of applicants who are not hired will generally be deleted within six months after the completion of the recruitment process, based on the Company's legitimate interests in defending and enforcing legal claims, unless a longer retention period is required or permitted under applicable laws and regulations, or you have provided consent for extended storage.

If you withdraw your application, your application materials will be deleted without undue delay, unless retention is necessary to comply with legal, regulatory, dispute resolution, or recordkeeping obligations under applicable laws. For a period of six months following the end of the application process, the Company may retain a record of your withdrawal of application for the purpose of defending against potential legal claims, based on legitimate compliance and risk management needs.

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 conducted in accordance with the Personal Data Protection Act 2010 of Malaysia ("PDPA") and other applicable laws and regulations, with appropriate safeguards implemented to protect the security and confidentiality of personal information.

7. Talent pool

With your consent, your application data may be included in the Company's talent pool so that you can be considered for future job opportunities. In addition to the group company to which you originally applied, relevant Human Resources 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 explicit consent will serve as the legal basis for storing and processing 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 data will be removed from the talent pool without undue delay. In any event, data stored in the talent pool will be retained for no longer than three years.

Where personal information is transferred to group companies located outside of Malaysia, such transfers will be carried out in accordance with the requirements of the Personal Data Protection Act 2010 of Malaysia ("PDPA") and other applicable laws and regulations governing cross-border transfers of personal information. Where required, separate consent will be obtained for such transfers. Appropriate contractual, technical, and organizational safeguards will be implemented to ensure an adequate level of protection for your personal information.

8. Reporting

To improve the efficiency of recruitment 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 this purpose will contain only aggregated statistical data that does not identify any individual applicant.

Such processing will be carried out in accordance with the Personal Data Protection Act 2010 of Malaysia ("PDPA") and other applicable laws and regulations, and will be limited to what is necessary to support the improvement and optimization of recruitment processes. Appropriate measures will be implemented to ensure that personal information is protected and cannot be used to identify individuals in the resulting reports.

III. Recipients of data, third country transfers

Your personal information may be disclosed to 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 Human Resources 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 roles).

Service providers acting on behalf of the Company, including providers of cloud-based software or human resources management systems, recruitment agencies, translation service providers, and other third-party service providers engaged to support recruitment processes, as well as providers involved in conducting pre-employment screening (PES) where applicable.

Relevant authorities, regulatory bodies, and competent institutions, including chambers of commerce and industry, where disclosure is required under applicable laws and regulations.

Where personal information is transferred to group companies or service providers located outside of Malaysia, such transfers will be conducted in accordance with the requirements of the Personal Data Protection Act 2010 of Malaysia ("PDPA") and other applicable laws and regulations governing cross-border transfers of personal information. Where required, separate consent will be obtained for such transfers. Appropriate contractual, technical, and organizational safeguards will be implemented to ensure that personal information is adequately protected.

In addition, personal information may be disclosed to other recipients where you have provided consent, or where disclosure is required by law, court order, or in connection with legal proceedings, including requests from law enforcement or prosecuting authorities, in accordance with applicable legal obligations and authorization requirements under the PDPA and other relevant laws and regulations.

IV. Origin of the data

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

In order to fill vacancies more efficiently, we may also conduct targeted searches on professional networking platforms and other publicly accessible sources with a clear professional context to identify suitable candidates. In this context, we only use information that is publicly available from such sources 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 Personal Data Protection Act 2010 of Malaysia (“PDPA”) and other applicable laws and regulations. The processing is limited to what is necessary for recruitment purposes, including identifying suitable candidates and efficiently filling open positions. Appropriate safeguards will be implemented to ensure the security and proper handling 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 Personal Data Protection Act 2010 of Malaysia (“PDPA”) and other applicable laws and regulations, 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

You also have the right to object to the processing of your personal information in certain circumstances. 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 before such withdrawal.

In addition, under the Personal Data Protection Act 2010 of Malaysia (“PDPA”), you have further rights including the right to access, copy, correct, supplement, delete your personal information, as well as the right to withdraw consent and request explanation of the rules governing the processing of your personal information.

To exercise your rights as a data subject against a Weber-Stephen company based in the Asia, please direct it 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.