

RECRUITMENT PRIVACY NOTICE LUMILEDS

Version 23 May 2018

With this Lumileds Recruitment Privacy Notice ("**Notice**") you are informed on the processing of data that identify you as an individual or relates to you as an identifiable individual ("**Personal Data**") in the context of the Lumileds recruitment processes. This notice is partly based on the requirements of the EU General Data Protection Regulation ("**GDPR**"). This is why you will sometimes see some legal language as required by the GDPR.

This Notice applies to all job applicants, candidates and other persons that are in any way subject of the recruitment processes of Lumileds. This Notice will not apply after you become an employee of Lumileds. In those cases, you will be referred to the Employee Privacy Notice of Lumileds.

1. WHO IS RESPONSIBLE?

The responsibility for the processing of your Personal Data lies with the Lumileds employer of your aim and Lumileds Holding B.V. (together "**Lumileds**"). You can find the contact details of these entities on the website of Lumileds [Contact Us](#).

2. WHICH PERSONAL DATA ARE PROCESSED?

The types of Personal Data that Lumileds will process in the context of the recruitment process are listed below. Where other Personal Data are collected and processed by Lumileds, you will be informed thereof separately where necessary.

- a.* **Your personal details:** including name, work and home address, gender, date of birth, social security number, marital/civil status, nationality, identity card/passport data, and data on work permit.
- b.* **Your CV information:** including information as listed in CVs, education and training details, work history, driver's license, reference check and screening details.
- c.* **Information on your possible future position:** including job function of interest, company and location, possible contract data, compensation and benefits, terms of employment.

3. PROCESSING FOR RECRUITMENT AND SELECTION PURPOSES

Lumileds collects and processes your Personal Data because this is necessary for (i) taking the necessary steps, at your request, prior to entering into an employment agreement; and (ii) Lumileds' legitimate business interests in the scope of finding suitable employees. We will make sure that we always balance your privacy interests with our business interest. Our purposes may include assessing your application and eligibility to work with Lumileds, verifying the information we received on you and (where permitted) performing pre-employment screening to ensure you meet our standards of integrity. Where the job function requires us to conduct such screening, and we are allowed to do so under applicable law, we will inform you thereof separately'.

4. PROCESSING SENSITIVE DATA

Sensitive data are Personal Data that may reveal sensitive characteristics of you, such as criminal convictions or offenses or your ethnicity. Within the strict limits set out in applicable law, Lumileds may need to collect and

process such sensitive data in the course of the recruitment process because this is necessary for taking the necessary steps, at your request, prior to entering into an employment agreement. Depending on applicable local laws and regulations, such sensitive data processing may include the purposes as listed below. Where other sensitive data are collected, Lumileds will inform you thereof separately.

- a.* Lumileds may collect and process your photo or video image for site access and security reasons, including any pre-employment screening purposes. Images may also be processed to remove or reduce inequality or to ensure diversity in staffing.
- b.* Lumileds may collect and process criminal data (including data relating to criminal behavior, criminal records or proceedings regarding criminal or unlawful behavior) to make a decision on you for your eligibility to work at Lumileds and for pre-employment screening.

5. MANDATORY PERSONAL DATA

- a.* During the recruitment processes, you may be required to provide Lumileds with certain information for Lumileds to be able to assess your eligibility to enter into an employment agreement with Lumileds (e.g. a copy of a passport, work permits, education certificate). Where you do not provide us with such information, this may imply that your recruitment process with Lumileds cannot be completed.

6. COLLECTION OF PERSONAL DATA

- a.* In most cases, Lumileds collects the Personal Data directly from you, because you provide us with your Personal Data, for instance via your application letter and CV.
Lumileds will also collect certain Personal Data from other parties, for instance from LinkedIn.

7. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- a.* In the scope of Lumileds' international operations, Lumileds may share your Personal Data with its group companies where so required for the recruitment process, for instance where you or your colleagues will work in a different Lumileds entity. During the recruitment process, candidate information will be accessed internally only by those Lumileds employees (including employees of Lumileds affiliates) who are directly involved in the recruitment process.
- b.* In the scope its operations, Lumileds may also need to disclose your Personal Data to companies outside Lumileds, such as third party service providers (providing services in the scope of the recruitment process (including recruitment agencies), IT system and infrastructure support, travel services, or in the context of mergers and acquisitions. Lumileds will put in place agreements with third party service providers in the scope of data protection.
- c.* Such transfer may include transferring Personal Data to other countries (including countries other than where you are based that have a different data protection regime than is found in your country), including outside the European Economic Area ("EEA"). If you are located in the EEA, some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here : https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as the Lumileds Privacy Code for Employee Information with regard to transfers within the Lumileds group (binding corporate rules as described in article 47 GDPR)

or standard contractual clauses for transfers outside the Lumileds group (as described in article 46 (2) (c) and (d) GDPR). You may obtain a copy of these standard contractual clauses by contacting privacy@lumileds.com.

- d.* In case you are located outside the EEA, and the recipient of your Personal Data is based outside the EEA in a country that is not considered to have an adequate level of data protection, Lumileds will ensure that this transfer appropriately safeguarded as required under our Privacy Code. You may obtain a copy of these standard contractual clauses by contacting privacy@lumileds.com.

8. SECURITY

- a.* Lumileds shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk associated with the Personal Data processing to protect Personal Data from misuse or accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure acquisition or access.
- b.* Lumileds will require its third party service providers to access Personal Data only on a need to know basis, to keep Personal Data confidential and to protect the security of Personal Data with appropriate technical and organizational measures.

9. RETENTION PERIOD AND ACCURACY

- a.* Lumileds will retain Personal Data as long as required or permitted for the recruitment procedure. If your application procedure is successful, Lumileds will retain your Personal Data in accordance with the Lumileds Employee Privacy Notice. The criteria used to determine our retention periods include: (i) the length of time of the recruitment process; or (ii) whether there is a legal obligation we are subject to.
- b.* If your application is not successful or for any other reason not completed, Lumileds will delete or anonymize your Personal Data, unless you have indicated your permission for Lumileds to retain your Personal Data for a longer period (e.g., to contact you for future positions that may suit your skills and capabilities).
- c.* Lumileds will take reasonable steps to ensure that your Personal Data processed are relevant for the recruitment and selection process, and that they are accurate, complete and kept up to date for carrying out the purposes described in this Notice. Please keep your Personal Data up to date and inform us of any significant changes.

10. YOUR RIGHTS

- a.* If you would like to request to review, correct, update, suppress, restrict or delete Personal Data that we process, or if you would like to request to receive an electronic copy of the Personal Data you provided to us (to the extent this right to data portability is provided to you by applicable law), you may contact us by: privacy@lumileds.com. We will respond to your request consistent with applicable law.
- b.* In your request, please make clear what Personal Data you would like to have changed, whether you would like to have your Personal Data suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Data. For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify

your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in any case within the time limits set by applicable law.

- c. If Lumileds' collection and use of your Personal Data is based on your consent, you have the right to withdraw that consent at any time. Your withdrawal will not affect the lawfulness of Lumileds' use of your Personal Data based on consent before the withdrawal.
- d. Additional information for the EEA: You may also contact our Global Privacy Officer responsible via privacy@lumileds.com or Lumileds Group, attention Global Privacy Officer, The Base (Tower B5), Evert van de Beekstraat 1, 1118 CL Schiphol, the Netherlands. Alternatively, you have the right to file a complaint with the data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities is available at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.
