

Für Informationen auf Deutsch bitte an den Beginn des Dokuments gehen.

DATA PROTECTION DECLARATION – MEAAP-Version

1. General

Thank you for your interest in Umdasch Group. The protection of your personal data in processing throughout the entire job-application process is a matter of great importance to us and We want you to feel secure when you visit the recruiting website We use.

Umdasch Groups intention with this declaration is to tell you about the scope of personal data We acquire in the framework of your application for a post with us and the purpose for which these data will be used, as well as the use of our Recruiting Website, including AI-based functions used to support applicant selection, in accordance with the applicable data-protection provisions and in particular in accordance with the provisions set out in the GDPR and the EU Artificial Intelligence Act.

"Umdasch Group" or "We"/"Us"/"Our" is the company referred to as employer in the respective job vacancy. In Austria, this may include, but not be limited to the following companies:

- Umdasch Group AG, Josef Umdasch Platz 1, 3300 Amstetten, Austria
- Doka GmbH, Josef Umdasch Platz 1, 3300 Amstetten, Austria
- Doka Österreich GmbH, Josef Umdasch Platz 1, 3300 Amstetten, Austria
- umdasch store makers GmbH (former Umdasch Shopfitting Group GmbH), Josef Umdasch Platz 1, 3300 Amstetten, Austria
- Umdasch Amstetten Store Makers GmbH, Josef Umdasch Platz 1, 3300 Amstetten, Austria
- Umdasch Store Makers Leibnitz GmbH, Ottokar-Kernstock-Gasse 16, 8430 Leibnitz, Austria
- Umdasch Digital Retail GmbH, Industriezeile 35/5, 4020 Linz
- Umdasch Group Ventures GmbH (former Doka Ventures GmbH), Josef Umdasch Platz 1, 3300 Amstetten, Austria
- Form-on GmbH, Josef Umdasch Platz 1, 3300 Amstetten, Austria

In Austria, this may include, but not be limited to the following companies:

- Deutsche Doka Schalungstechnik GmbH, Frauenstraße 35, 82216 Maisach
- Doka Distribution Center Apolda GmbH, Ludwig-Edinger-Str. 3, 99510 Apolda
- umdasch Store Makers Neidenstein GmbH, Josef-Umdasch-Straße 7, 74933 Neidenstein
- umdasch Store Makers Construction GmbH, Lengericher Landstraße 3, 49078 Osnabrück
- umdasch Digital Retail Germany GmbH, Mülheimer Straße 72-74 47057 Duisburg

The company referred to as employer in the job vacancy or in Candidate Interaction is acting as controller in accordance with the General Data Protection Regulation in the relevant case.

2. Definitions

"Candidate" is any natural person navigating the Recruiting Website as

- a potential future employee of Umdasch Group or its subsidiaries; or
- a participant in Candidate Interaction.

"Candidate Interaction" is any employer branding or marketing initiative run by Umdasch Group via the Recruiting Website, e.g., raffles, quizzes, surveys, etc. Moreover, Candidate Interaction is any form of communication between you and Us that is based on the preferences you have selected in the Talent Community, e.g., job alerts, newsletters, etc.

"Doka GmbH" is Doka GmbH, Josef Umdasch Platz 1, 3300 Amstetten, Austria, processor in accordance with the GDPR, unless Doka GmbH is referred to as employer in the job vacancy or Candidate Interaction.

"Umdasch Group" is the group of Umdasch Group AG, Josef Umdasch Platz 1, 3300 Amstetten, Austria, with its subsidiaries.

"GDPR" is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation)

"Personal data" are all items of information relating to an identified or identifiable natural person, including for example name, postal address, email address and telephone number.

"Recruiting Website" is a website provided by SmartRecruiters where job vacancies are published. Via that website Candidates may start and manage their application process and employees may make referrals for open positions. Additionally, on this website We also run Candidate Interaction, e.g., by providing news about Umdasch Group, work-related information, initiatives, raffles, etc.

"SmartRecruiters" is SmartRecruiters Europe Ltd., 59-60 Thames Street, Windsor, Berkshire. SL4 1TX, UK, processor in accordance with the GDPR.

"Talent Community" means Candidate Interaction between Candidates and Us that is managed by means of a relationship management tool (e.g., "SmartCRM" by SmartRecruiters). We use Talent Community to

- stay in contact with Candidates who have not been selected for a vacant position during an application process; or
- provide employer marketing information to Candidates; or
- administrate Candidate Interaction.

3. General Information about processing of your Personal Data

In this document We are going to inform you about how We are going to process your Personal Data when using the Recruiting Website of SmartRecruiters. Our processing depends on whether you are

- Applying for a job vacancy as a Candidate; or
- Referring a job vacancy to someone (in that case We address you as "Referring Person"; this applies primarily to Our employees); or
- Using the Recruiting Website without starting an application process, sharing a content or making a referral.

Candidates may find information in section **Fehler! Verweisquelle konnte nicht gefunden werden..**

More specifically We are informing you about processing of your Personal Data when

- using the Recruiting Website for starting the application process (section 4.1.a), and
- sharing a job vacancy or referring it to a potential Candidate (section 4.1.b); and
- participating in Candidate Interaction (section 4.1.c).

Referring Persons may find information in section 5.

Please also see the Privacy Policy and Cookie Policy of SmartRecruiters when you are **using the Recruiting Website**. You may access that document directly via <https://www.smartrecruiters.com/legal/general-privacy-policy/> and <https://www.smartrecruiters.com/legal/cookie-policy/>, respectively, or directly via a link on the Recruiting Website.

4. Processing of Personal Data of CANDIDATES

a. Your application process on the Recruiting Website

Legal basis:

By starting your application process on Our recruiting website you express your interest in applying for an employment relationship with Us. We are therefore processing your personal data provided by you in order to take **steps at your request prior to entering into a contract** (Art 6 sect. 1 lit. b, second option GDPR).

- In case your application will be rejected, We are processing your data based on Our **legitimate interests** (Art. 6 sect. 1 lit f GDPR) in assessing or defending against claims, e.g., based on non-discrimination legislation (such as the Austrian Equal Treatment Act - GIBG).
- In case of a successful application, We are processing your data for the **performance of the employment contract** (Art. 6 sect. 1 lit b, first option GDPR).

Purpose

We process the personal data you provide to Us only for managing your **job application**, making database searches, analyzing applications in order to evaluate Our application procedures, as well as for asserting of and defending against legal claims. Managing your job application also includes notifying you of job vacancies that are similar to the position you have originally applied for.

Types of processing

Your data are being processed in a central applicants database of Doka GmbH, which is provided by SmartRecruiters. In case you are also registered for Candidate Interaction via Talent Community, your Personal Data processed in the applicant tracking system is connected with the processing of your Personal Data in the candidate relationship management tool (see also section 4.c – “Candidate Interaction”).

Categories of personal data processed by Us

For using the Recruiting Website, Candidates are obliged to provide the following information:

- First name, surname;
- E-Mail address;
- Screening questions for the assessment of your professional and/or other knowledge and experience relevant for the open position (only obligatory if applicable for the specific position).

Additionally, job applicants may provide the following information (by filling out a form or by uploading data) proactively or upon request:

- Further contact information (e.g. phone number);
- Date of birth;
- Educational background (e.g. university degree,...)
- Experience and knowledge relevant for the position or job (e.g. professional experience, knowledge of specific software, leadership experience,)
- Documentation of working permits applicable to the respective job;
- Photo;
- Record of information relevant for the specific job/position that may be uploaded as an attachment (e.g. resume, certificates, records)

Duration of processing

Your Personal Data will be processed during your application process, as well as up to the following period, depending on whether the hiring Umdasch Group company has its registered seat in

- Philippines, Turkiye: four (4) years
- Australia, India, Malaysia, Oman, Singapore, United Arab Emirates: seven (7) years
- Indonesia, Kuwait, Qatar, Saudi Arabia: ten (10) years
- Egypt: fifteen (15) years

from the completion of the application process in case of the rejection of your application. After this period, your Personal Data will be deleted, unless you have consented to longer retention. In case of a successful application, We are processing your data according to Our data protection declaration for employees.

b. Sharing a job vacancy and referral

Description

On Our Recruiting Website you may share Our job vacancies with other persons. This offer is made to

- **Candidates** who wish **to send** the link to the position **to their own** means communication (alternative 1) or

- persons acquainted with or related to you (especially Our employees) who have had contact with you and want to notify you of a job information and **refer** the position to you upon your consent (alternative 2).

When receiving the invitation you get the possibility to confirm the referral. Prior to your confirmation your Personal Data will be processed in Our central applicants data base provided by SmartRecruiters and subsequently be deleted within 30 days, unless you confirm your interest. Upon your confirmation your Personal Data will be processed according to section 4.a of this document.

Legal basis

- Under alternative 1 (forwarding to yourself) We process your Personal Data provided by you in order to take **steps at your request prior to entering into a contract** (Art 6 sect. 1 lit. b, second option GDPR)
- Under alternative 2 (referral) We process your Personal Data provided by your friends or acquaintances upon your **consent** to the processing activity described in this document (Art 6 sect. 1 lit. a GDPR).

Purpose

We are processing your Personal Data provided either by you (alternative 1) or a Referring Person (e.g. Our employees who know you or are friends with you; alternative 2) exclusively for managing your job application (alternative 1) or the referral made to you (alternative 2), as well as for asserting of and defending against legal claims. In case of a referral (alternative 2) your Personal Data will be processed also to manage Our employee referral program, if applicable.

Types of processing

Your Personal Data is being processed in a central applicants database of Doka GmbH, which is provided by SmartRecruiters. Upon your confirmation your Personal Data will be processed according to section 4.a of this document.

Categories of personal data processed by Us

For sharing with or referring to you an open position, the following information needs to be provided obligatorily:

- Your first name, surname;
- Your E-Mail address;
- Your familiarity with the Referring Person
- A recommendation text

Additionally, the following information may be provided in referrals (by filling out a form or by uploading data) proactively or upon request:

- Your phone number);
- Record of information relevant for the specific job/position that may be uploaded as an attachment (e.g. resume, certificates, records)

Duration of processing

Upon forwarding a job vacancy to yourself or upon a referral Your Personal Data is going to be processed up to 30 (thirty) days from the referral in Our central application database of Doka GmbH provided by SmartRecruiters and is going to be deleted, unless you have consented to a processing after that moment. Upon your confirmation your Personal Data will be processed according to section 4.a of this document.

c. Active applications outside the recruiting website

Description:

If you send us your application proactively by any means other than via the recruiting website (e.g. sending an application to Doka employees, etc.), your data will be processed by our employees via the recruiting website. In this case, section 4. a shall apply.

Legal basis

By sending us your application, you contact us and express your interest in establishing an employment relationship. We therefore process the personal data you enter in order to carry out **pre-contractual measures** that are taken at your request (Article 6 (1) (b) 2nd case GDPR).

1. If your application is rejected, we process your data on the basis of our **legitimate interest** (Art. 6 para. 1 lit. f GDPR) to assess and defend against any claims, e.g. on the basis of non-discrimination legislation (such as the Austrian Equal Treatment Act - GIBG).
2. If your application is successful, your data will be processed for **the fulfilment of the employment contract** (Article 6 (1) (b), 1st case GDPR).

Purpose

We process the personal data provided by you exclusively for the purpose of processing your application, database searches, analysis of incoming applications, evaluation of the application process and to defend against or assert legal claims. By processing your application, we also mean pointing you to jobs that are similar to the position you have applied for.

Types of processing

Your data will be processed in a central applicant database of Doka GmbH, which is provided by SmartRecruiters. You will receive an invitation to confirm your application on our Recruiting Website. If your interest is confirmed, the processing will be carried out in accordance with Section 4. **Fehler! Verweisquelle konnte nicht gefunden werden.** of this Privacy Policy.

Categories of personal data processed by Us

For applications outside the Recruiting Website, we will process any data You have submitted to us. This regularly includes the following data:

- First name, surname;
- E-Mail address;
- Screening questions for the assessment of your professional and/or other knowledge and experience relevant for the open position (only obligatory if applicable for the specific position).
- Further contact information (e.g. phone number);
- Date of birth;
- Educational background (e.g. university degree,...)
- Experience and knowledge relevant for the position or job (e.g. professional experience, knowledge of specific software, leadership experience,)
- Documentation of working permits applicable to the respective job;
- Photo;
- Record of information relevant for the specific job/position that may be uploaded as an attachment (e.g. resume, certificates, records)

Duration of processing

If you apply outside the recruiting website, your data will be transferred to the central applicant database of Doka GmbH, which is provided by SmartRecruiters, and deleted after 30 days, unless you confirm your interest. Upon confirmation of your interest, processing will take place in accordance with section 4.a of this declaration.

d. Recruitment via External Recruiting Agencies

Description

To fill certain vacancies, we occasionally engage external recruiting agencies ("Recruiting Agencies"). These Recruiting Agencies may transmit your personal data to Us or proactively present suitable candidates to Us on the basis of a separate legal relationship between you and the respective agency. Unless you start an application process via Our Recruiting Website yourself or explicitly give consent, Umdasch Group processes your personal data only to the limited extent described below. For information about how the Recruiting Agency processes your personal data for its own purposes, please refer to the privacy policy of the respective Recruiting Agency.

Legal Basis

Processing is carried out

- where the Recruiting Agency transmits your data to Us at your request, for the purpose of taking **steps prior to entering into a contract** pursuant to Art 6 sect 1 lit b, second option GDPR (e.g., by clicking on our job advertisement on the Recruiting Agency's website, etc.);
- where the placement is based on **consent** you granted to the Recruiting Agency, pursuant to Art 6 sect 1 lit a GDPR (e.g., by indicating to the Recruiting Agency that you are seeking a job as a production employee, software developer, or similar, and the Recruiting Agency suggests our job posting to you, etc.);
- to pursue Our **legitimate interests** in efficient recruitment and in asserting or defending legal claims pursuant to Art 6 sect 1 lit f GDPR (e.g., by engaging a Recruiting Agency to contact suitable candidates based on publicly available information, etc.).

Purpose

- Receiving and reviewing profile proposals submitted by Recruiting Agencies;
- Contacting you to determine your interest in the specific position;
- Documenting the placement;
- Asserting or defending legal claims (e.g., under equal-treatment legislation or in relation to the agency's fee claims).

Type of Processing

Your data are initially processed in a segregated area of the central applicant database accessible only to Our recruiting department. If you confirm your interest in the position or start the application process, your data are transferred into the regular workflow in accordance with section 4.a.

Categories of Personal Data Processed

- Master data (name, title, contact details);
- Professional and educational information (CV, certificates, qualifications);
- Details on availability, salary expectations, mobility;
- Other information lawfully provided to Us by the Recruiting Agency within the scope of its mandate.

Duration of Processing

If you decline further contact or no application process is initiated within 30 days, your data will be deleted or anonymised. If an application process is begun, section 4.a on storage periods applies.

Disclosure to Third Parties Apart from the recipients listed in section 8, only the Recruiting Agency engaged by you or by Us receives access to the data necessary for the placement. No further disclosure to third parties takes place without an independent legal basis.

e. Candidate Interaction

Description

By interacting with Us in Our employer branding or marketing initiatives on the Recruiting Website (see the definition of Candidate Interaction), you get in contact with us via Our Candidate relationship management tool (see the definition of Talent Community above). As a first step your Personal Data is going to be processed in order to facilitate your use of the Recruiting Website. As a second step you may select a specific form of Candidate Interaction, e.g., raffle, quiz, survey, job alert, newsletter, etc. Your Personal Data will then be collected and processed according to the specific activity requested by you, e.g., your participation in a raffle, providing you with the information you have requested, etc.

Legal basis

- When you are navigating our Recruiting Website, We process the Personal Data provided by you in order to take steps at **your request prior to entering into a contract** (Art 6 sect. 1 lit. b, second option GDPR).
- When you request a specific form of Candidate Interaction, We process your Personal Data provided upon your **consent** to the processing activity described in this document (Art 6 sect. 1 lit. a GDPR).

Purpose

Candidate Interaction has the purpose of running employer branding and marketing activities, as well as facilitating the interaction between you and Us.

Types of processing

When navigating Our Recruiting Website, your Personal Data is going to be processed in order to correctly make the Recruiting Website available to you, as well as according to your selections made regarding the use of Cookies.

Limited to the extent of the selection you have made when requesting the specific form of Candidate Interaction, your Personal Data is being processed in a candidate relationship management tool of Doka GmbH, which is provided by SmartRecruiters. In case you are also participating in an application process, your Personal Data processed in the candidate relationship management tool is connected with the processing of your Personal Data in the applicant tracking system (see also section 4.a – “Your application process”).

Categories of personal data processed by Us

When you are **navigating Our Recruiting Website**, We process information about your computer hardware and software. This information can include: your IP address, browser type, domain names, access times and referring website addresses.

For **Candidate Interaction**, the following information needs to be provided obligatorily or voluntarily:

- Your first name, surname;
- Your E-Mail address;
- Keywords for your job alerts
- Your preferred location
- Your level of experience
- Your preferred function
- Your phone number;
- Other information necessary or useful for specific forms of Candidate Interaction.

Duration of processing

In general, We only process your Personal Data in connection with Candidate Interaction as long as this is necessary to fulfill the purpose for which it was collected.

Unless otherwise determined in a specific case, exemplary, your Personal Data will therefore be processed during the following periods:

- Candidate Interaction for informational purposes: The consent documentation is going to be processed until its withdrawal.
- A raffle was executed completely and a winner has been determined:
 - o Personal Data of the winning participant will be deleted upon the expiry of three months from the notification of the winner.
 - o Personal Data of the non-successful participants will be deleted within 14 days from the determination of the winner.

Beyond this period, your Personal Data will only be processed to fulfill statutory retention obligations (e.g. to fulfill the 7-year storage obligation according to the applicable tax and company law provisions). If necessary, the data can be stored as long as potential legal claims against Doka according to general civil law or special laws have not yet become statute-barred; for certain claims, the statutory limitation period can be up to 30 years. The legal basis for this is Art. 6 Sect. 1 lit. c GDPR.

Your Personal Data will therefore be deleted or rendered anonymous when the legal basis for further processing ceases to apply.

f. Social Media Target Group Success Measurement

Description

We try to find the right target group for our job advertisements on the Internet (e.g. on social media) and to offer you those vacancies that could be interesting for you. We also try to evaluate how effective our job advertising is.

Legal basis

We process your personal data on the basis of your **consent** to marketing cookies (Art. 6 para. 1 lit. a GDPR). You can manage this consent yourself via the cookie settings on the website, on which the job advertisement is displayed to you, and via your browser. In addition, the withdrawal of your consent on our website only ends the processing by us, but not the processing by advertising platforms that process your data (independently of us) during your other use of the Internet.

Purpose

This processing is carried out to determine the target group for our advertising (e.g. job advertisements) and to measure advertising performance.

Types of processing

We use cookies to determine the target group and effectiveness of our job advertisement postings. You can find information about this here and in our website's privacy policy (regarding advertising platforms where we place job advertisement postings). You can allow or reject these cookies through our cookie settings on the website, on which the job advertisement is displayed to you. These cookies process information e.g. about what advertisements are presented to you and how you interact with them. This allows us to determine how you or other users have engaged with them, and whether the goals of the advertising campaign have been achieved. The information includes, for example, whether you viewed an ad, whether you clicked on it, whether it encouraged you to buy a product or visit a website, click on or apply for a job ad, etc. This information is helpful in determining the relevance of advertising campaigns.

Categories of data processed

- Timestamp of your interaction with the advertising posting to the job vacancy.
- Click ID of advertising platforms (e.g. FBCLID for Facebook, etc.). The Click-ID contains information about your use, interests and activities in connection with a particular social media platform (e.g. Facebook), such as the content suggested to you, as well as the third-party providers relevant to you (e.g. professional providers, educational platforms, companies of interest to you, etc.). We do not know the exact content of your Click ID, it is used by us to match a user of an advertising platform with a specific application. If you have any questions about your Click-ID, please contact the platform on which you came across a job advertisement.
- Job ID that our service provider creates for the respective job advertisement and links to your Click ID.

Duration of processing

The data is stored by your browser locally on the device you are using permanently and generally without limitation. It is only sent to us or our service provider when you interact with a job advertisement posting (e.g., when you click on the ad). You can remove this data yourself in your browser (Name: hic_conv_params).

g. Use of AI functions of the Recruiting Website (e.g., "Winston")

Description

As part of the application and selection process, the Umdasch Group uses supportive functions based on artificial intelligence (AI) within the Recruiting Website it employs. An AI system in the field of employment (e.g., recruitment or selection of personnel) is considered a high-risk AI system under Regulation (EU) 2024/1689 of 13 June 2024 ("AI Act"). This system analyses the application data you provide (e.g., CV, answers to screening questions, qualifications) as well as structured process data (e.g., timestamps in the recruitment process, job requirements) to assist recruiters and hiring managers in the pre-selection and evaluation of applications.

The analysis is carried out solely as a supplement to human assessment and does not result in solely automated decision-making within the meaning of Art. 22 GDPR.

The improvement and updating of the AI models is carried out by our service provider. Only anonymised or aggregated data is used for this purpose. Identifiable application data is not processed for training purposes.

How the AI support works: The AI compares the information you provide in your application with the requirements of the advertised position. For example, it identifies which qualifications, work experience or skills are a good match. Based on this, the AI creates a recommendation or sorts applications by relevance. This recommendation is shown to recruiters and hiring managers, who then decide how to proceed. The AI does not make any final decision – all decisions are always made by humans.

Legal basis

Processing is based on our legitimate interest (Art. 6 (1) (f) GDPR) in conducting an efficient and objective recruitment process. If, in the course of AI processing, special categories of personal data within the meaning of Art. 9 GDPR are processed (e.g., health data evident from voluntarily provided application documents), this will only take place on the basis of your explicit consent (Art. 9 (2) (a) GDPR).

Purpose

To support the structured and timely evaluation of applications, prioritisation of suitable candidates, and improvement of transparency and traceability in selection processes.

Categories of personal data processed by Us

- Master data (name, contact details)
- Qualification data (education, professional experience, skills)
- Answers to screening questions
- Application documents (e.g., CV, certificates)
- Metadata from the recruitment process (e.g., timestamps, job ID)

Duration of processing

The data processed as part of the AI functions is not stored longer than other application data in the Recruiting Website. Retention periods follow the general retention periods for applicant data described in this privacy notice (see section 4.a). There is no independent storage beyond these periods.

5. Processing of Personal Data of REFERRING PERSONS

Description

You have the possibility to recommend suitable Candidates to Us, provided that you have collected their consent prior to referring open positions to them. We explicitly prohibit any use of this possibility without such consent.

For referrals you may preferably use the features of the Recruiting Website that are enabling you to send links to job vacancies to other persons on social media or via communication services such as e-Mail. When you are using these options We are processing your Personal Data as described in this document. Moreover, employees have the possibility to draw the attention of their friends and acquaintances to Our open positions and to ask such Candidates to inform Us about their referral during their application process.

Legal basis

Upon your referral We are processing your Personal Data based on Our **legitimate interest** (Art 6 sect. 1 lit f GDPR). Our legitimate interest is the efficient and comprehensible processing of referrals in application processes, as well as the documentation and processing of the claims linked to a referral (and in case of employee referrals, to manage Our employee referral program, if applicable).

Purpose

We are processing your Personal Data as Referring Person for the following purposes. Those purposes may vary depending on the type of referral you have chosen and the information you have disclosed to us, and may include:

- Your identification;
- Documentation of your referral and your confirmation of having collected the consent of the Candidate;
- Assignment of your referral to a specific application;

- In case of employee referrals: management of Our employee referral program (including, but not limited to contacting you, documentation, assessment of the preconditions for rewards, processing of payment).

Types of processing

Your Personal Data is being processed in a central applicants database of Doka GmbH, which is provided by SmartRecruiters.

Categories of personal data processed by Us

Upon your referral the following We are processing the following Personal Data that

- You have provided when submitting a referral, e.g.:
 - o Your first name and surname;
 - o If applicable: information about your familiarity with the person to which you have referred an open position;
 - o Your e-Mail address;
 - o Further information you have provided to Us in e.g. in the text box with your referral; as well as
- (in case of employees) originate from the employment relationship with Us and that are required for the correct processing of your referral. The following categories may be processed:
 - o Master data, e.g. name, division, department, function, company e-Mail address, company phone number;
 - o Compliance data, e.g. information about your familiarity with the Candidate;
 - o Payment processing data, e.g.: your banking information, cost center, tax information, etc.

Duration of processing

In general, We only process your Personal Data in connection with referrals for as long as this is necessary to fulfill the purpose for which it was collected.

Depending on where the hiring Umdasch Group company is located, the information about your referral will therefore be processed for a period of

- four (4) years (Philippines, Türkiye), or
- seven (7) years (Australia, India, Malaysia, Oman, Singapore, United Arab Emirates); or
- ten (10) years (Indonesia, Kuwait, Qatar, Saudi Arabia), or
- fifteen (15) years: Egypt.

from the completion of the application process of the person you recommended.

Beyond this period, your Personal Data will only be processed to fulfill legal storage obligations (e.g. to fulfill the 7-year storage obligation according to the applicable tax and company law provisions). If necessary, the data can be stored as long as potential legal claims against Doka according to general civil law or special laws have not yet become statute-barred; for certain claims, the statutory limitation period can be up to 30 years. The legal basis for this is Art. 6 Sect. 1 lit. c GDPR.

Your Personal Data will therefore be deleted or rendered anonymous when the legal basis for further processing ceases to apply.

6. Processors and other service providers

For processing your application, sharing of a job vacancy, or referral, We are involving SmartRecruiters as processor of your Personal Data. In case a position is not vacant at Doka GmbH, but at another company of Umdasch Group, We also involve Doka GmbH as such a processor.

SmartRecruiters is providing the following services: Operation (incl. analysis) of the recruiting website and the central applicant database (including the operation of the platform's AI-based functions); processing of communication with Candidates via the Recruiting Website.

Doka GmbH is providing the following services: consultancy services regarding legal advice, implementation of the application process, administration of data, individual communication with Candidates.

We may involve additional service providers for specific processing activities, e.g., for the administration and evaluation of applications, for Candidate Interaction via job alerts together with recruitment agencies, etc. Service providers may process Your Personal Data as processors on our behalf, as independent controllers, or together with us as joint controllers.

7. Disclosure of your Personal Data

Your Personal Data will only be used in Umdasch Group, and will only be disclosed or otherwise transmitted as part of the application process or Candidate Interaction to persons within the company who are necessarily involved in the process within the Umdasch Group, at SmartRecruiters, or at service providers for application management, or for Candidate Interaction. Apart from that, there will be no transfers to third parties outside the Umdasch Group without Your consent (e.g., via Your cookie preferences) or without an independent legal basis between You and a third party (e.g., when You register with a recruitment agency that is presenting You as a candidate for one of Our vacancies, when a third party contacts You on its own behalf and then introduces us, etc.). Please note that third-party recruitment agencies may process your personal data independently, based on the separate relationship between You and the respective agency.

In exceptional cases, your Personal Data may be submitted to competent authorities, such as tax, supervisory or security authorities, or public bodies, courts or other third parties if disclosure is necessary (i) under applicable laws or regulations; or (ii) to exercise, protect or defend legal rights or claims; or (iii) to protect the vital interests of you or of another natural person.

8. Technical and organisational measures

To ensure an adequate level of protection and purpose limitation in the processing of your personal data, Umdasch Group implements appropriate technical and organisational measures. For example everyone involved in the job-application process is under obligation to observe strict confidentiality. State-of-the-art encryption systems are used for transfer of your personal data, access rights and authorizations are granted based on a layered approach, and these measures are extended to include service providers.

9. Data subjects' rights and contact

We wish to inform you that in accordance with the GDPR, you have rights in relation to the processing of your personal data, including the right to

- to check whether and which personal data We have stored about you and to receive copies of this data (right to information)
- to request the correction, addition or deletion of your personal data that is incorrect or not processed in accordance with the law (right to correction and deletion; right to be forgotten);
- to request that We restrict the processing of your personal data (right to restriction);
- to object to the processing of your Personal Data in certain circumstances or to withdraw consent previously given for processing, in particular where processing is based on a referral according to section 4.b of this document (right to object or withdraw consent);
- to receive the Personal Data that you have provided to Us in a structured, common and machine-readable format and to transfer this data to another person responsible (right to data portability)

We do not process your Personal Data for the purpose of making decisions that are based solely on automated processing (including profiling), and that have legal effects on you (Art. 22 GDPR).

To exercise these rights, please contact:

Doka GmbH
Human Resources
Josef Umdasch Platz 1
3300 Amstetten
Austria

E-Mail: dataprotection@doka.com
Phone: +43 (0) 7472 - 605-0

We would like to draw your attention to the fact that if you want to contact Us by other means than the Recruiting Website and the email address mentioned above, We have to identify the competent person for your request and forward your request to them. As a result, We may not be able to prevent people other than those absolutely necessary for processing your application from learning about your application.

You also have a right of appeal to the data protection authority of the Republic of Austria (<https://www.dsb.gv.at/>) or another competent data protection authority on matters relating to data protection.

10. Modifications to this Data Protection Declaration

We update Our privacy policy regularly. This can also include the adjustment of this Data Protection Declaration. We will inform you by making an updated version available on the Recruiting Platform. Please make sure to regularly access this document in order to learn about the current version.

11. Final provisions

Umdasch Group reserves the right to cease operation of the Recruiting Website at any time, either partially or completely, and to delete data without notifying the data subject, particularly on ascertaining that data are incorrect or no longer current. Umdasch Group does not assume any guarantee for the availability of its recruiting website, for the accuracy or freedom from errors of the information that it contains or for freedom from industrial or intellectual rights or copyright of third parties.

In all other respects, liability on the part of Umdasch Group is excluded to the extent permitted by law.

As of: April 2026