

## Privacy policy

Dear Customer,

As a company dedicated to promoting study, training and work in Germany, KOWELT places great importance on the protection of your personal data and your privacy. In this privacy statement we would like to inform you about how we collect, use, disclose, transfer and store your personal data and how we ensure that this data is treated securely and confidentially.

### 1. general

This privacy policy applies to the processing of personal data by KOWELT UG in connection with our services. The protection of your personal data is very important to us and we strictly adhere to the applicable data protection regulations, in particular the European Data Protection Regulation (EU-DSGVO).

### 2. responsible body

The responsible body in the sense of the EU-DSGVO is KOWELT UG, represented by the Managing Director Mr. Cédric William Tsebase, with its registered office at Lange straÙe 38, 38448 Wolfsburg, Germany.

### 3. purpose and legal basis of data processing

We process the data that you provide to us in connection with your registration and participation in the self-application in order to be able to carry out the application procedure. The application procedure consists of a registration for the self-application and a substantive decision based on your test result. We process your personal data within the framework of the statutory provisions for the implementation of a' pre-contractual measure (Art. 6, Para. 1, lit. b DS-GVO). According to this, the processing of data required in connection with the decision on the award of a grant is permissible.

If you register in the application portal, further personal data will be stored in order to process your online application and to carry out the test: Your name, place and date of birth, telephone number, email address, address, gender, and details of your studies, university entrance qualification and work experience. In addition, for error handling of error messages, we store your IP address, the page accessed, the log-in procedures and the browser and operating system you use, your name and your e-mail address.

### 4. processing of personal data

#### 4.1 Data processing of customers and interested parties

Within the scope of our services, we process personal data of customers and interested parties who are interested in our services. In doing so, we collect information such as your name, your contact details, your application documents or your CV. We need this data to provide you with our services, to process your enquiries, to communicate with you and to manage our contractual relationship with you.

#### 4.2 Data processing of applicants

When you apply for a job with us, we process personal data such as your name, contact details, CV, education and work experience, qualifications and information about your work permit and

residence documents. We need this data to process your application and to decide whether you are eligible for the advertised position.

#### 4.3 Data processing of business partners

We process personal data from business partners such as our contractors, suppliers or service providers. This may include information such as name, contact details, contractual and billing data and communication history. We need this data to manage contractual relationships and to provide our services efficiently.

#### 5 Legal basis for the processing of personal data

We process your personal data based on the EU GDPR and other applicable data protection laws. We process your personal data to comply with our legal obligations, to enter into and perform a contract with you or to pursue our legitimate interest in providing our services and improving our business. In some cases we may also need your consent to process your personal data. In all cases, we will ensure that your personal data is only used for the purposes described in this Privacy Policy.

#### 6. disclosure of personal data

KOWELT will only disclose your personal data to third parties if this is necessary to provide our services or to comply with legal obligations. We may also share personal data with our partner companies or service providers who assist us in providing our services. These third parties are contractually obliged to process your personal data only in accordance with our instructions and in compliance with this Privacy Policy.

#### 7. transfer of personal data to third countries

We may transfer your personal data to countries outside the European Union (EU) or the European Economic Area (EEA) where this is necessary to provide our services. We will ensure that your personal data is only transferred to countries that ensure an adequate level of data protection in accordance with the EU GDPR or that appropriate measures have been taken to ensure an adequate level of data protection.

#### 8. duration of the storage of personal data

We will only store your personal data for as long as is necessary to fulfil the purposes for which it was collected or for as long as is required by law. After these periods have expired, we will delete or anonymise your personal data.

#### 9. your rights

You have the right to obtain information about the personal data we hold about you. You also have the right to request the correction of incorrect data, to request the deletion of your data, to restrict the processing of your data or to object to the processing of your personal data. If we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time. Please contact us if you wish to exercise your rights.

#### 10. data security

We take appropriate technical and organisational measures to ensure the security of your personal data. We have taken reasonable precautions to protect your personal data from loss, misuse, unauthorised access, disclosure, alteration or destruction.

## 11. contact us

If you have any questions about this privacy policy, wish to exercise your rights or lodge a complaint about the processing of your personal data, you can contact us. Our contact details can be found on our website.

## 12 Complaints

If you believe that we are not processing your personal data in accordance with this Privacy Policy or applicable data protection laws, you have the right to lodge a complaint with the competent supervisory authority. The supervisory authority responsible for us is the data protection commissioner(s) of the federal state in which our company is based.

## 13. final provisions

Should individual provisions of this data protection declaration be or become invalid or unenforceable, this shall not affect the validity of the remaining provisions. In place of the invalid or unenforceable provision, a valid and enforceable provision shall apply which comes closest to the purpose pursued by the parties.

## 14 Changes to the data protection declaration

We reserve the right to change or update this Privacy Policy from time to time. We will always provide notice of changes to this Privacy Policy by posting the updated version on our website. If we make any changes that could materially affect your rights, we will notify you before applying such changes by sending an email to the email address we have on file or by posting a notice on our website. It is your responsibility to regularly review our privacy policy to stay informed of any such changes.

## 15. applicable law

This Privacy Policy is subject to the applicable data protection laws in Germany, in particular the General Data Protection Regulation (DSGVO) and the Federal Data Protection Act (BDSG-neu).

Status: 19 February 2023

This data protection declaration was last updated on 19 February 2023.