

Data protection notice for the applicant management process at Robert Bosch East Africa Ltd

We want you on our team!

In this privacy notice, we inform you how your personal data is processed in the applicant management process at Robert Bosch East Africa Ltd (in the following also “RBKE” or “we”/“us”). Additionally, we inform you about your rights under applicable data privacy laws.

Robert Bosch East Africa Ltd respects your privacy

Protecting your personal data and ensuring the security of all our business data are important concerns for us. We always consider these concerns in our business processes. The personal data collected when you apply online is treated confidentially and strictly in accordance with the statutory provisions.

Data privacy and information security are an integral part of our corporate policy.

Data controller

Robert Bosch East Africa Ltd (Kenya) is the controller responsible for the processing of your data; exceptions are outlined in this data protection notice.

Our contact details are as follows: Robert Bosch East Africa Ltd | P.O. Box 66156-00800 | Nairobi | KENYA
Visitor address: 7th Floor, Delta Chambers, Waiyaki Way, P.O. Box Number: 66156-00800 Westlands, Nairobi
Tel. +254 715 377 877

You will find the contact details of the controller in the job advertisement in the application management system.

Data categories processed

The following are the main categories of personal data processed:

- Master data (e.g., name, date of birth, nationality, place of residence)
- Documents (e.g., references, certificates, résumés)
- Education and training details (e.g., data about school education, university, professional qualification)
- Communication data (e.g., e-mail address, (mobile) phone number, IT user ID in case of internal applications)

Purposes of processing and legal bases

We process your personal data in compliance with the Data Protection Act of 2019, with the national data privacy laws and with any other applicable national laws.

The personal data processing takes place during the applicant management process particularly for the purpose of preparation for an employment relationship with a legal entity of the Bosch Group.

The main legal basis for this purpose is Data Protection Act of 2019 – Part 1, Clause 3, together with applicable national data protection laws (“in order to take steps at the request of the data subject prior to entering into a working contract”).

Other legal bases are:

- Data Protection Act of 2019 – Part 4, Clauses 30 and 32, together with applicable national data protection laws (“Consent”): e.g., for Bosch applicant community as part of the applicant management system or for reviewing my application for other open positions.
- Data Protection Act of 2019 – Part 4, Clauses 30(1)(b)(vii), (“Legitimate interest”): We will always gently balance our legitimate interests in the organization of our business (e.g., HR evaluations like personal controlling, analytical reporting) against your interest in protecting your personal data in accordance with the statutory provisions. In order to carry out the application process efficiently, we match your qualifications with the requirements of the respective position using artificial intelligence and calculate the suitability level from this. Automated decision-making is not associated with this.

Children

This applicant management platform is not meant for children under 18 years of age.

Collecting of personal data

As a rule, your personal data is collected directly from you during the hiring process.

The easiest way to apply for a job at Bosch is a direct application for a position advertised on one of our job portals, where you enter your data in the candidate profile created individually for the advertised position. You hereby have the possibility to send us the data by connecting to a social network, by a manual input and/or by using “CV Parsing” (Transferring some data from your CV to our job portal).

We recommend to only upload documents in pdf format. Due to technical reasons other data formats lead to temporary local data copies in order to be displayed.

The data from paper applications is transferred manually to the application system. You receive an email in order for you to activate your manually created application. If you do not activate your application within 30 days, your data is deleted from our application management system, and you will not be considered any further in the selection process.

Additionally, you have the possibility to be referred by a Bosch Group employee. For this purpose, you need to give your application documents to this employee, who then uploads it in the application management system. You receive an email with which you can activate your application. If you do not activate your application within 30 days, your data is deleted from our application management system, and you will no longer be considered in the selection process. Your application is linked with the employee who uploaded it in the application system. This helps us in identifying that this employee has referred you. Furthermore, this employee can track the status of your application (invitation, rejection etc.) on an overview page but has no access to the details of the application process.

We keep you up to date on the status of your application via e-mail.

Prior to sending your application, you have the possibility to you give your consent for allowing your profile to be shared with further hiring managers or recruiters that offer open positions.

Staffing of positions may require a further check of your application data and your career path. The result of this check is documented in the application management system. We inform you about such checks in a transparent manner in the framework of our job advertisements. This check takes place taking local legal requirements into consideration and by involving carefully selected service providers.

Recipients of your personal data

- Within a legal entity of the Bosch Group

Only the people involved in the application process (e.g., line managers and associates of the recruiting department, HR associates and associate representatives) have access to your personal data for the purposes mentioned above within the legal entity of the Bosch Group to which you have applied.

- Other legal entities within the Bosch Group

Other legal entities are data controllers themselves. The above-mentioned persons involved in the recruiting process may belong to different companies of the Bosch Group. Therefore, your data may be transferred to the respective persons worldwide within the Bosch Group.

In case of your appointment, your data is transferred from our application management system to our HR-administration systems. In this process, your data may be transferred to a different legal entity and will thereafter be processed as employee data. An exchange of your personal data with other legal entities within the Bosch Group takes place especially in order to fulfill the contracts as well as due to our legitimate interest to organize the internal workflows (e.g., Shared Services, execution of transfers or relocations across legal entities).

- Recipients outside the Bosch Group

We may disclose your personal data to other data controller only, if necessary, for the application, if the third party or we have a legitimate interest in this disclosure, or if you have provided your consent. You will find the details of the legal bases in the section "Purposes of processing and legal bases".

- Data processors

In addition, we use service providers to fulfill our contractual and legal obligations among other things. Insofar as these service providers processes personal data on our behalf, we have concluded the contracts required under the data protection law with them.

We select our service providers carefully and monitor them on a regular basis, especially regarding their diligent handling and protection of the data that they store and process. All service providers are obliged to maintain confidentiality and to comply with the statutory provisions. Service providers may also be other companies of the Bosch Group.

You will find a list of our contractors and service providers (with whom we have a long-term or ongoing business relationship) in *Annex 1*.

Duration of storage (in Germany)

Principally, we store your data for as long as it is necessary for the purposes for which they were collected or processed or for as long as we have a legitimate interest in storing the data. In all other cases, we delete your personal data with the exception of data we are obliged to store for the fulfillment of legal obligations.

After conclusion of the application process (e.g., by rejection from our side or withdrawal from your side) we will delete your personal data in general within 4 months.

Cookies

Categories

We distinguish between cookies that are mandatorily required for the technical functions of the online service and such cookies and tracking mechanisms that are not mandatorily required for the technical function of the online service.

It is generally possible to use the online service without any cookies that serve non-technical purposes.

- **Technically required cookies**

By technically required cookies we mean cookies without those the technical provision of the online service cannot be ensured. These include e.g., cookies that store data to ensure smooth reproduction of video or audio footage. Such cookies will be deleted when you leave the website.

- **Marketing cookies and tracking mechanisms**

General

By using marketing cookies and tracking mechanisms we and our partners are able to show you offerings based on your interests, resulting from an analysis of your user behavior:

- Statistics:

By using statistical tools, we measure e.g., the number of your page views.

- Conversion tracking:

Our conversion tracking partners place a cookie on your computer ("conversion cookie") if you accessed our website via an advertisement of the respective partner. Normally these cookies are no longer valid after 30 days. If you visit certain pages of our website and the cookie has not yet expired, we and the relevant conversion partner can recognize that a certain user clicked on the advertisement and thereby was redirected to our website. This can also be done across multiple devices. The information obtained by means of the conversion cookie serves the purpose of compiling conversion statistics and recording the total number of users who clicked on the respective advertisement and were redirected to a website with a conversion tracking tag.

- Social plugins:

Some of the pages of our online service involve content and services of other providers (e.g., Facebook, Twitter) which also may use cookies and active modules.

- Retargeting:

These tools create user profiles by means of advertising cookies or third-party advertising cookies so called "web beacons" (invisible graphics that are also called pixels or tracking pixels), or by means of comparable technologies. These are used for interest-based advertising and to control the frequency with which the user looks at certain advertisements. The relevant provider is the controller responsible for the processing of data in connection with the tool. The providers of the tools might disclose information also to third parties for the purposes mentioned above. Please note the data protection notices of the relevant provider in this context.

Please note that using the tools might include transfer of your data to recipients outside of the EEA where there is no adequate level of data protection pursuant to the GDPR (e.g., the USA). For more details in this respect please refer to the following description of the individual marketing tools:

Google Analytics

Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

Function: Analysis of user behavior (page retrievals, number of visitors and visits, downloads), creation of pseudonymous user profiles based on cross-device information of logged-in Google users (cross-device tracking), enrichment of pseudonymous user data with target group-specific information provided by Google, retargeting, UX testing, conversion tracking and retargeting in conjunction with Google Ads.

Google Tag Manager

Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

Function: Administration of website tags via a user interface, integration of program codes on our websites

Security during data processing

We take all the necessary technical and organizational measures to ensure appropriate levels of security and to protect your personal data particularly from the risks of unintended or unlawful destruction, manipulation, loss, alteration, or disclosure to or access by unauthorized third parties. We are constantly trying to improve our security measures and keep them state of the art.

User rights

To enforce your rights, please use the information in the section "Contact information of the data protection officer". Please make sure that we can unambiguously identify you.

- **Right to information and access**

You have the right to obtain confirmation from us about whether or not your personal data is being processed, and, if this is the case, access to your personal data.

- **Right to correction and deletion**

You have the right to obtain the rectification of inaccurate personal data. As far as statutory requirements are fulfilled you have the right to obtain the completion or deletion of your data. This does not apply to data which is necessary for billing or accounting purposes, or which is subject to a statutory retention period. If access to such data is not required, however, its processing is restricted (see the following).

- **Restriction of processing**

If the legal requirements are fulfilled, you can demand that we restrict the processing of your data.



- **Objection to data processing based on the legal basis of “legitimate interest”**

You have the right to object to the processing of your personal data at any time, insofar as this is based on legitimate interest. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements which override your rights.

- **Withdrawal of consent**

In case you consented to the processing of your data, you have the right to revoke this consent at any time with effect for the future. The lawfulness of data processing prior to your withdrawal remains unchanged.

Data portability

If the legal requirements are fulfilled, you may request to receive data that you have made available to us in a structured, common and machine-readable format or - if technically feasible - to request that the data be transmitted to a third party.

Right to lodge complaint with supervisory authority

You have the right to lodge a complaint with a supervisory authority. You can appeal to the supervisory authority, which is responsible for your place of residence or your state of residency or to the supervisory authority responsible for us.

Office Of The Data Protection Commissioner,
12th Floor, Britam Tower,
Hospital Road, Upperhill,
P.O Box 30920-00100,
Nairobi, Kenya.
General enquiries email: info@odpc.go.ke
Website: www.odpc.go.ke
Tel: +254 752 896 867

Adjustments to the Data Protection Notice

We reserve the right to adjust our security and data protection measures. In such cases, we will amend our data protection notice accordingly. Please, therefore, notice the current version of our data protection notice in the job advertisement.

Contact information of the data protection officer

You can reach our data protection officer under:

Data Protection Officer
Information Security and Privacy (C/ISP)
Robert Bosch South Africa Pty (Ltd)
Private Bag X118
Midrand

SOUTH AFRICA

or

E-mail to: DPO.southafrica@za.bosch.com

To assert your rights please use the following link: <https://request.privacy-bosch.com/>

Should the legal entity to which your request refers not be selectable on the linked page, or to notify a data protection incident please use the following link:

<https://www.bkms-system.net/bosch-dataprotection>

Effective date: November 2024

Annex 1:
POPIA Act No 4 Of 2013 Privacy Notice

Service Provider	Processing
SmartRecruiters GmbH Dircksenstraße 47 10178 Berlin SmartRecruiters SP. Z o.o. Fabryczna 20, 31-553 Krakow, Poland SmartRecruiters Inc. 225 Bush Street, San Francisco, CA 94104, USA	Provision and development of the cloud platform (“Software as a Service”) for the above purposes. Processing of the provided personal data.
Signum GmbH Rungestraße 19 10179 Berlin	Processing of the personal data for career path check
Amazon Web Services Inc. 10 Terry Avenue North Seattle, WA 98109-5210, USA	Provision and operation of the technical infrastructure for the Cloud-Platform (“Platform as a Service”)
Mailgun Technologies, Inc. 112 East Pecan Street Suite 1135 San Antonio, TX 78205, USA	Processing of the generated email communication between BOSCH and the applicant
Text Kernel BV Nieuwendammerkade 28A17 Amsterdam, Noord-Holland 1022 AB The Netherlands	Provision, operation and further development of the application to import the data from CVs (CV-parsing)
I.K. Hofmann Projektmanagement GmbH Lina-Ammon-Str. 19 90471 Nürnberg	Processing of personal data for video interviews / selection process
Catalytic Inc. 954 W. Washington BLVD Suite 700 Chicago, IL 60607	Processing of personal data for reimbursement of personal job interview expenses.
HiredScore, Inc. 158 Mercer Street, Suite 3M, New York, NY 10012	Provision of AI solution for suggesting suitable offers for job applicants