

STEFANINI EMEA | Recruitment Data Protection Statement

Effective Date: May 2022

Last Revised: February 2026

Part I – Introduction and Scope

Article 1 – Data Controller

Data Controller	Stefanini
Registered Seats	As listed at https://stefanini.com/en/global
Careers Website	https://stefanini.com/en/careers/emea
Recruitment Email	RecruitmentEMEA@stefanini.com
Data Protection Contact	privacy@stefanini.com

Article 2 – Purpose and Scope

2.1 This Data Protection Statement explains how Stefanini (“Stefanini”, “we”, “us”, “our”) collects, uses, and protects the personal data of job candidates who respond to our job openings or submit spontaneous applications through our Recruitment section at <https://stefanini.com/en/careers/emea> or by email to RecruitmentEMEA@stefanini.com.

2.2 This Statement supplements our Corporate Privacy Policy, available at: <https://stefanini.com/en/privacy-policy>

2.3 When you submit Personal Data to Stefanini by sending your application, you acknowledge that you have read and understood this Privacy Statement and agree to be bound by it. If you disagree with this Statement, please do not transfer Personal Data to Stefanini.

2.4 You are not obliged to provide Personal Data, but your application cannot be processed without essential information. You are responsible for the accuracy of all data provided. Any misrepresentation may impact your candidacy.

Article 3 – Definitions

Term	Definition
Personal Data	Any information relating to an identified or identifiable natural person.
Candidate	Any individual who applies for employment at Stefanini, whether in response to a job opening or spontaneously.
Processing	Any operation performed on Personal Data, including collection, recording, organising, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, alignment, combining, restriction, erasure, or destruction.

Data Protection Laws	All data protection laws applicable in the European Union, including local, state, national and/or foreign laws, treaties, and/or regulations, such as the GDPR and national implementations thereof.
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Article 4 – Legal Framework

4.1 This Statement complies with:

- (a) The General Data Protection Regulation (EU) 2016/679 (“GDPR”);
- (b) All applicable national implementations of EU Data Protection Laws.

Part II – Personal Data We Collect

Article 5 – Categories of Personal Data

5.1 We collect the following categories of Personal Data from Candidates:

Data Category	Data Elements
Identity & Contact	Name, business title, address, telephone/mobile/fax, email, postal address
Application Materials	CV/resume, cover letter, transcripts, diplomas, certificates
Professional Background	Employment history, professional qualifications, skills
Education	Educational background, degrees, institutions attended
Job Preferences	Positions of interest, availability, location preferences, job qualifications
Compensation	Salary expectations, compensation requests
References	Employment references and related information
Background Checks	Results (if required for the position and permitted by law)
Consent Records	Your consent to processing and marketing permissions, including cookie consent

5.2 We only collect Personal Data which is adequate, relevant, and not disproportionate for the Recruitment process. We do not process special categories of Personal Data (sensitive data) of Candidates.

5.3 Your Personal Data will not be sold to any third party or used by third parties for their own direct marketing or other purposes.

Article 6 – Sources of Personal Data

We collect Personal Data from:

Source	Examples
Directly from you	CV submissions via email, web forms, telephone, electronic messages, interviews

Our website	Online career section forms, chatbot interactions
Third parties (as permitted by law)	Recruitment agencies, referrals, career platforms, professional social media (e.g. LinkedIn), background or employment checks

Part III – Purposes and Legal Basis

Article 7 – Processing Purposes

We process Candidate Personal Data for the following purposes:

Purpose	Description
Recruitment	Recruiting suitable personnel and collaborators to operate our business.
Application Processing	Processing applications for advertised and spontaneous positions.
Evaluation	Supporting and evaluating the recruitment process.
HR Software Management	Populating and managing the Human Resources Software with collected Candidate Personal Data.
Hiring Administration	Managing hiring processes and compliance with corporate governance, legal, and regulatory requirements.
Communications	Sending communications, including promotional communications regarding job opportunities, surveys, or events.
Employment Transition	If hired, using data in connection with employment and corporate management.

Article 8 – Legal Bases for Processing

Legal Basis (GDPR)	Application to Recruitment
Consent – Art. 6(1)(a)	When you give your explicit consent, for example when you file and send your candidature for a job opening. You may withdraw consent at any time.
Legal Obligation – Art. 6(1)(c)	Where Stefanini is required by law to process the Personal Data for a legally defined purpose.
Legitimate Interests – Art. 6(1)(f)	Stefanini's legitimate interest in the solicitation, evaluation, and selection of Candidates for employment and to progress their application, balanced against your rights and interests.

Article 9 – Profiling and Automated Decision-Making

9.1 We do not engage in profiling or fully automated decision-making that produces legal effects concerning you.

Part IV – Data Sharing and Transfers

Article 10 – Recipients of Personal Data

We may share Candidate Personal Data with:

Recipient	Purpose
Stefanini recruiters (globally)	Candidate Personal Data will be available to all Stefanini recruiters of the Stefanini Group globally.
Hiring managers	Interview and hiring decisions.
Third-party service providers	Language screening, background checks, recruitment support services (bound by confidentiality and data processing agreements).
Customers (as decision makers)	Where required as part of the recruitment process for client-facing positions.
IT service providers	Application systems, website operation, hosting, HR Software maintenance.
Government authorities	When required by law to protect Stefanini's rights.
Third parties in corporate transactions	In connection with a merger, acquisition, or similar activity.

All third-party recipients are bound by strict standards of security, confidentiality, and secrecy. When third parties are given access to Personal Data, appropriate contractual arrangements including data processing agreements and/or Standard Contractual Clauses are put in place.

Article 11 – Third-Party Sub-Processors

The table below shows the third-party processor that Stefanini employs for Recruitment:

Company	Services	Privacy Statement	Data Location
SmartSearch (Advanced Personnel Systems, Inc)	Recruitment software and Candidate Tracking System	smartsearchinc.com/privacy-policy	EU

Article 12 – International Transfers

12.1 Stefanini hosts its website and Human Resources Software on its servers or those of third-party sub-processors globally. Your Personal Data may be stored and processed in any country where Stefanini operates and may be shared with any company of the Stefanini Group globally (see <https://stefanini.com/en/global>).

12.2 By providing Personal Data to Stefanini, you acknowledge that your data may be transferred across Stefanini's subsidiaries in countries inside or outside the EU/EEA, which may have different data protection rules.

12.3 For transfers outside the EEA, we implement appropriate safeguards including the European Commission's Standard Contractual Clauses and contractual arrangements with our parent company, group companies, and affiliates.

Part V – Data Retention

Article 13 – Retention Periods

Scenario	Retention Period
German citizens or residents	Maximum 2 years after completion of the recruitment process.
All other EU citizens or residents	Maximum 3 years after completion of the recruitment process.
Successful application (hired)	Retained for a longer period for audit purposes and employment management, in accordance with applicable laws.
Early withdrawal request	Deleted as soon as you notify Stefanini at privacy@stefanini.com that you no longer wish your Personal Data to be processed, to the extent not contrary to legal requirements or a legitimate interest of Stefanini.

After the applicable retention period, Candidate Personal Data will be deleted. Your profile in the Human Resources Software will also be deleted, if applicable.

In the absence of a withdrawal request, your continued provision of data is interpreted as consent for retention in accordance with applicable GDPR regulations.

Part VI – Data Security

Article 14 – Technical and Organizational Measures

14.1 In order to secure the integrity, confidentiality, and availability of Personal Data and to protect stored Personal Data from illegal access, improper use, alteration, unlawful or accidental destruction, and accidental loss, Stefanini uses various technical, physical, and organizational security measures following the newest technologies.

14.2 Stefanini commits to implement at all times adequate security to protect manual and electronic processing of Personal Data and prevent its misuse, in accordance with applicable local legal requirements. Third parties and affiliates processing Personal Data are contractually required to observe equivalent security measures.

Article 15 – Incident Response

15.1 We promptly evaluate and respond to incidents suggesting unauthorized processing.

15.2 In the event of a data breach, we will notify you without undue delay.

15.3 To report a security vulnerability: privacy@stefanini.com

Part VII – Your Rights

Article 16 – Data Subject Rights

As a Candidate, you have the following rights under the GDPR:

Right	Description
Access (Art. 15 GDPR)	Obtain confirmation and access to your Personal Data, free of charge.

Rectification (Art. 16 GDPR)	Request correction of inaccurate or incomplete data.
Erasure (Art. 17 GDPR)	Request deletion of your data at any time if you wish to withdraw your candidacy.
Restriction (Art. 18 GDPR)	Request limitation of processing in certain circumstances.
Data Portability (Art. 20 GDPR)	Receive your data in a structured, machine-readable format.
Objection (Art. 21 GDPR)	Object to processing based on legitimate interests.
Withdraw Consent	Withdraw consent at any time for consent-based processing.

To exercise your rights, request access to your data, modify, delete, or restrict processing of your Personal Data, contact: privacy@stefanini.com

Stefanini will make every reasonable effort to comply promptly with your request. To protect your privacy and the integrity of your Personal Data, Stefanini may take reasonable steps to verify your identity before responding.

Stefanini may limit access to your Personal Data where such access is unreasonably burdensome or expensive under the circumstances, or as otherwise permitted by international standards.

Part VIII – AI Usage

Article 17 – Artificial Intelligence and Automated Processing

17.1 Stefanini may use artificial intelligence (AI) tools to support the recruitment process, for example to assist with candidate screening, CV parsing, or scheduling. Where such tools are used, they serve an assistive function only and do not replace human decision-making. All recruitment decisions involving the assessment or selection of Candidates are made or reviewed by qualified Stefanini personnel.

17.2 Stefanini does not engage in profiling or fully automated decision-making that produces legal effects concerning you or similarly significantly affects you within the meaning of Article 22 GDPR.

17.3 Where AI tools process your Personal Data, the same legal bases, security measures, and data subject rights described in this Statement apply. If an AI-based tool is provided by a third-party sub-processor, that provider is bound by appropriate data processing agreements and confidentiality obligations.

17.4 Stefanini is committed to using AI tools in a fair, transparent, and non-discriminatory manner. If you have questions about the use of AI in your recruitment process, you may contact us at privacy@stefanini.com.

Part IX – Contact and Complaints

Article 18 – Data Protection Contact

In accordance with GDPR regulations, Stefanini has appointed a Data Protection Committee. For questions on Stefanini's processing of your Personal Data or to exercise your Data Subject rights, contact Stefanini at: privacy@stefanini.com

We will respond to questions or concerns within 30 days.

Article 19 – Supervisory Authority

Authority	Belgian Data Protection Authority
Website	https://www.dataprotectionauthority.be/

If you believe that the processing of your Personal Data is in violation of the GDPR, you have the right to lodge a complaint with the supervisory authority. You may also seek judicial remedies if you believe you have suffered damage.

Article 20 – Amendments

Stefanini may update this Statement from time to time to reflect changes in its Personal Data handling and protection practices or to comply with laws and regulations. Material revisions will be communicated electronically, by prominent notice on our website, or via the Human Resources Software.

Candidates will always be able to locate the current version on the Stefanini website. If Stefanini intends to process data for purposes other than those for which it was collected, Candidates will be notified in advance in compliance with statutory provisions.

Further information can be found in the Stefanini Privacy Policy at: <https://stefanini.com/en/privacy-policy>