

# PRIVACY NOTICE - Recruitment

## 1 Purpose of this Privacy Notice

As an employer, Rosti ("we") aim to attract candidates and recruit employees for various positions worldwide, using direct recruitment, recruitment services and web solutions. We also target young talents by cooperating closely with educational institutions in all locations we have business units.

You are reading this Privacy Notice because you have either applied for an open position in Rosti or you have been suggested to Rosti as potential candidate.

During a recruitment process we will process your personal data. This means that we are a "data controller" and that we are responsible for deciding how we hold and use your personal data.

The purpose of this Privacy Notice is to make you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, with whom we might share it and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

We respect your privacy and will protect all your personal data that we collect, use and store.

## 2 Our processing of your personal data

In the table below, you can find information about our processing of your personal data. We describe the purpose of the processing, i.e. why we process your personal data. For each purpose, it is also stated which categories of personal data we may process to fulfil the purpose, which legal basis we base the processing on and how long we process the data.

Purpose	Categories of personal data	Legal basis	Retention period
To be able to administer and implement an efficient recruitment process including receiving applications, conducting interviews, testing and background checks, to make decisions regarding employment and to recruit new staff after recruitment has been completed.	Name, date of birth, address, contact details, photograph, gender, professional title, current and former place of work and position, CV and other application documents, information on health status (if you provide such information), information relating to your previous experience and certificates, grades, marks, testimonials and the like, communication, results from tests, information from background checks (if you apply for a senior role or if it is necessary according to national legislation) and any information provided by you during interviews.	The processing is based on a balance of interests as a legal basis, where Rosti's legitimate interest is to be able to evaluate your merits and personal qualities in connection with recruitment decisions. We may also process some information based on legal requirements.	Until the recruitment process is finalized and the position is filled and for two years thereafter. If you agree, we may keep your application documents for future recruitments.
To keep an "application bank" for future recruitments.	Name, date of birth, address, contact details, photograph, gender, professional title, current and former place of work and position, CV and other application documents, information relating to your previous experience and certificates, grades, marks, testimonials and the like, results from tests, and any information provided by you during interviews.	Rosti bases such processing on your consent. You are free to withdraw your consent at any given time.	Until your consent is withdrawn. Results from tests are stored for six months.
To protect and defend Rosti's legal interests.	Name, date of birth, address, contact details, photograph, gender, professional title, current and former place of work	Rosti bases such processing of your personal data Rosti's legitimate interest in protecting and	Until the end of any legal process.

	<p>and position, CV and other application documents, information on health status (if you provide such information), information relating to your previous experience and certificates, grades, marks, testimonials and the like, communication, results from tests, information from background checks (if you apply for a senior role or if it is necessary according to national legislation) and any information provided by you during interviews.</p>	<p>defending its rights in the event of a dispute. We may also process some information based on legal requirements.</p>	
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In case the recruitment is concluded with a decision to offer you the job, the personal data collected during the recruitment process will be used to provide a job offer and the employment contract.

If you are then hired, the relevant personal data collected during the recruitment process will be processed by us to fulfil the contractual obligation set forth in the employment agreement and to fulfil any mandatory obligations set forth by the applicable laws. How and why, we process person data of our employees is set out in a separate privacy notice available on [www.rosti.se/privacy](http://www.rosti.se/privacy).

In specific cases your data may be used for fulfilling our statutory obligation whether locally or at group level.

### **Processing of sensitive personal data**

If you are applying for a senior position or if required by mandatory applicable law, we may also collect and use the following “special categories” of more sensitive personal data necessary due to the nature, scope and/or security requirements related to the position in question:

- criminal records
- information about your health, may include any medical condition, health and sickness records

Please be aware that you have a responsibility to ensure that any information you send is within the bounds of the law.

#### **If you fail to provide personal data**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

### **3 Other sources we may use to get information about you**

Additional necessary information regarding to your work history, qualification and suitability for the position may be obtained from:

- recruitment service providers or consultants providing recruitment services, e.g., pre-screening and interviewing applicants and handling candidates testing or assessments as a part of the recruitment process
- reference persons whose contact details you have provided to us
- social media designed for recruitment purposes, like LinkedIn
- in rare cases also from publicly available websites.

Also, subject to the applicable laws, information may be obtained through background checks, security clearances and other similar information sources deemed necessary due to the nature and security requirements related to the open position in question.

### **4 Personal data sharing**

#### **Sharing with service providers**

Your personal data may be disclosed to recruitment service providers or consultants when Rosti requires such services. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### **Sharing within Rosti**

As we are international group of companies, your personal data may be shared with other entities of Rosti Group during international recruitments. International recruitment is either for higher managerial positions, international talent recruitment and/or there is requirement of "grandfather's" (manger's manager) approval.



All our third-party service providers and other entities in the Rosti Group are required to take appropriate security measures to protect your personal data in line with our policies. We ensure the security obligation is applied with data protection contracts.

In case our recruiting or involved entity is located outside of EU/EEA, we may transfer your personal data outside of EU/EEA during international recruitments. In such situations, we ensure that sufficient level of data protection is maintained through appropriate safety measures, and unless the transfer is made to a country deemed by the EU Commission to provide sufficient protection the transfer will be based upon the EU Commission's model clauses / standard contractual clauses.

We do not sell, hire out, distribute, or otherwise make your personal data available to any third party other than what is set out above.

## **5 Data Security**

To protect your privacy, detect, prevent, and mitigate the risk of attacks, etc., we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Rosti ensures that access to your personal data is only given to personnel who need it to perform their duties and that they observe confidentiality.

## **6 Data Retention**

Rosti only process personal data for as long as is necessary to achieve each purpose stated in section 2 above.

After the recruitment process has ended, we retain your personal data in identifiable format for no longer than 24 months based on our genuine needs (e.g., the chosen candidate declines the offer to join, and we decide to approach to another candidate) and legislative requirements (e.g., to satisfy any claims or questions raised by candidate). After 24 months we will either delete your personal data and documents provided by you or anonymise the data for recruitment statistics purposes. However, in certain cases, e.g., for purposes of defending us against an actual or potential legal claim, or if otherwise necessary in relation to legal proceedings or defending a legal right or if the local legislation requires for a longer retention period, certain personal data may be retained for longer.

In case our interest is to save your data into our “application bank” for future recruitments, the local HR will contact you and requires your consent to do so with provision of relevant information. This is voluntary and you have right to decline such request. Our “application bank” is reviewed on regular bases and the maximum retention time for your data in our “application bank” is up to two years. However, the tests and profiling done during the recruitment will be stored up to six months.

When a candidate is chosen for the position, his/her personal data relevant for the employment relationship shall be transferred to Rosti's employee register or system. When a candidate is already employed by Rosti, the information relating to the fact that he/she applied for the position, may be retained even if the person is not selected for the position until the termination of employment relationship.

## **7 Your rights in connection with our processing of your personal data**

If you are an EU citizen or if your personal data is processed by a Rosti entity based in the EU and in accordance with the GDPR, you have the right to:

- **Request access to your personal data.** This enables you to receive a copy of the personal data we hold about you and to check that we are collecting and using it lawfully.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to use it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of collecting and using your personal data.** This enables you to ask us to suspend the usage of your personal data, for

example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer of your personal data** to another party.
- **Right to lodge a complaint** to supervisory authority

If we process your personal data based on your consent, you have the right to withdraw your consent at any time without affecting the legality of the processing, which was made on the basis of consent before its withdrawal.

When you make request, you must provide credentials with which it is possible to verify your identity.

If you want to review, verify, correct, or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, contact local HR, Rosti Legal or send an email to [gdpr@rosti.com](mailto:gdpr@rosti.com).

We do not charge you for exercising your rights presented in this section. However, when it is allowed according to applicable legislation, we may refuse to fulfil several similar consecutive requests or requests that are manifestly unfounded or excessive. We may also decline requests when our processing is necessary according to applicable legislation. We will inform you of such decisions and the grounds for the decline of your request.

## 8 Contact details

### 8.1 Data Controller, Employer

8.2 **Rosti Group AB**, company no. 556308-9456, a company organised and existing under the laws of Sweden with registered office at Västra Varvsgatan 19, 211 77 Malmö, Sweden, telephone: +46 40 204 701

8.3 **Rosti GP AB**, company no. 556307-6685, a company organised and existing under the laws of Sweden, with registered office at Baldersvägen 35, SE-332 35 Gislaved, Sweden, telephone: +46 371 846 50.

8.4 **Rosti GP Germany GmbH**, company no. HRB 21813, a company organised and existing under the laws of Germany with registered office at Heilbronner Straße 18, DE-01189 Dresden, Germany, telephone: +49 351 40 46 00.

8.5 **Rosti UK Ltd**, company no. 09847166, company organised and existing under the laws of England with registered office at Bridge Works, Stamford Bridge, York, YO41 1AL, United Kingdom, telephone: +44 1759 371551

8.6 **Rosti Business Development Ltd**, company no. 11192743, company organised and existing under the laws of England with registered office at Centrix Keys Business Village, Keys Park Road, Hednesford, Cannock, United Kingdom, WS12 2HA, telephone: +46 40 204 701.

8.7 **Rosti Integrated Manufacturing Solutions (Suzhou) Limited**, a company organised and existing under the laws of China with registered office at 1 Huazheng Street Suzhou Industrial Park Jiangsu Province 215026, People's Republic of China, telephone +86 512 6295 2000.

8.8 **Rosti Integrated Manufacturing Solutions (India) Private Ltd.**, company no. U22200TN2024FTCI75374, a company organised and existing under the laws of India with its registered address at O2 B04, Survey Nos. 119/1C Part, 119/2A Part, 119/2C Part, 120/1 Part, 120/2Part, 120/3 Part and 122/1 Part, ESR Oragadam Industrial and Logistics Park,Oragadam - Walajabad Road, Walajabad Taluk, Varanavasi, Kanchipuram,Sriperumbudur, Tamil Nadu, India, 631604, telephone: +91 96000 36185.

8.9 **Rosti IMS Sdn. Bhd.**, company no. 982244 T, a company organised and existing under the laws of Malaysia with its registered address at Suite 7E, Level 7, Menara Ansar, 65 Jalan Trus, 8000 Johor Bahru, Johor, Malaysia, telephone: +60 197 232 322.

8.10 **Rosti Poland Sp. z o.o.**, company no. KRS 0000371393, a company duly organized and existing under the laws of Poland with its registered address at ul. Myśliwska 18, 15-569 Białystok, Poland, telephone: +48 85 678 3500.

8.11 **Rosti Romania S.R.L.**, 56476 (Prahova), a company organised and existing under the laws of Romania with its registered address at Strada Principala Ploiești West Park, Clădirea SE, 107025 Aricestii Rahtivani, România, telephone: +40 037 498 2080.

- **Rosti İstanbul Plastik Sanayi ve Ticaret Anonim Şirketi**, company no. 148/4 (İstanbul) a company organised and existing under the laws of Turkey with its registered address at Selimpaşa Merkez, Kavaklı Mahallesi, Kible Sokak No:9 | Silivri/İstanbul , telephone: +90 (212) 875 11 75-76.
- **Plastics Components Inc**, company no 39-1640538, a company organised and existing under the laws of Wisconsin with its registered address at N116W18271 Morse Dr, Germantown, WI 53022, United States, telephone: +1 262-253-0353.
- **PCI of North Carolina, LLC**, company no 83-3527146, a company existing under the laws of Delaware with its registered office at 100 Falcone Pkwy Cary, NC, 27511-6712, United States, telephone: +1 (919) 467-5151.
- **Sports Molding, LLC**, company no 87-0371360, a company organised and existing under the laws of Utah, with its registered address at Free Port Center, BLDG. Z-13, Clearfield UT 84016, United States, telephone: +1 (801) 776-4233.

## 9 Contacting the Data Controller

In all questions and matters relating to personal data we are collecting and using or your rights as the data subject, please feel free to contact your local HR, Rosti Legal or by sending an email to [gdpr@rosti.com](mailto:gdpr@rosti.com).