

## Job Applicant Privacy Notice

As part of any recruitment process, Adtran Networks SE, Fraunhoferstrasse 9a, 82152 Martinsried/Munich, Germany and its affiliates (collectively as “Adtran Networks”) and Adtran Holdings Inc., 1209 Orange Street Wilmington, Delaware 19801, USA and its affiliates (collectively as “Adtran”) collect and process personal data as joint controllers (collectively as “we”, “us”) relating to job applicants to submit specific personal data. We are committed to being transparent about how we are collecting and using that data to meeting data protection obligations.

Any provisioning of personal data as part of the recruitment process is voluntary and you are under no contractual obligation to provide such data. However, if you do not provide the information, we may not be able to process your application properly or at all.

This privacy notice for job applicants (“Job Applicant Privacy Notice”) describes how we handle and protect your personal data in connection with the recruiting processes and programs. This Applicant Privacy Notice only applies to the personal data of job applicants, potential candidates for employment, and our optional recruiting programs and events. It does not apply to employees, contractors or customers, or other personal data that we collect for other purposes.

### What information do we collect?

We collect a range of information about you as job applicant, including:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability, for which we need to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the country in which the job offer and/or position that you applied to is located.
- We may collect this information in various ways, including the following:
  - from your application form or other documents including provided credentials, CVs or resumes, passport or other identity documents you provided or mentioned;
  - from publicly available resources, including social media as well as professional networking platforms such as LinkedIn, Xing, and Facebook;
  - from third parties, such as professional recruiting firms, your references or prior employers and employees with whom you have interviewed before; and
  - if you have consented and/or where permitted by applicable law, we may also contract service providers to conduct background checks in order to collect details of professional registrations, sanctions with professional bodies, financial checks or criminal convictions.

Data will be stored in a range of different places, including on your application record within our HR management system and related electronic communication such as emails. Data will be stored only in systems that are compliant with the GDPR.

### Why do we process personal data?

We need to process your data to work on your request prior to entering into any contract. In some cases, we need to process data to ensure that we are complying with legal or contractual obligations. For example, it is

mandatory to check a successful applicant's eligibility to work in a specific country or we are obligated to conduct background checks for security reasons before employment starts.

Processing data from you as job applicant allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to comply with our legal obligations and to respond to and defend against legal claims.

## **Who has access to this data?**

Your information may be shared internally for the purposes of the recruitment process. This includes sharing information with members of the Human Resources and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We may then share your data with third parties such as a payroll provider, but only to the extent the sharing is GDPR compliant.

We take the security of your data very serious. Internal policies and controls are in place to ensure that any personal data is not lost, accidentally destroyed, misused or disclosed.

## **For how long do we keep the collected data?**

If an application for employment is unsuccessful, we will hold the collected data on file for 6 (six) months after the end of the relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for a further 18 (eighteen) months for consideration for future employment opportunities. At the end of that period, or once the consent is withdrawn, your data will be deleted or destroyed.

All job applicants will be asked when submitting their CV whether they give us consent to hold their personal data for the full 24 (twenty-four) months after notice of not offering you an employment in order to consider you for future employment opportunities.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment and for a reasonable time thereafter. The specific timeframe depends on applicable legal requirements such as tax and accounting regulation. Details will be provided to you in a separate privacy notice.

## **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Adtran to change incorrect or incomplete data;
- object to the processing of your data where Adtran is relying on its legitimate interests as the legal ground for processing, and
- require Adtran to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing.

If you would like to exercise any of these rights, please contact as central point of contact Adtran Networks' Data Protection Officer located at Fraunhoferstrasse 9a; 82152 Martinsried/Munich, Germany per post or per e-mail ([dataprotection@adva.com](mailto:dataprotection@adva.com));

# Job Applicant Privacy Notice

If you believe that we have not complied with your data protection rights, you can complain to the competent authority for Adtran, called “Bayerisches Landesamt für Datenschutzaufsicht“ located at Promenade 27 (Schloss), 91522 Ansbach, Germany per post or per e-mail (poststelle@lda.bayern.de). An overview about other national data protection authorities you can find here: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

## Your confirmation

By submitting your personal data to us, you agree that:

- you have read and understood this Job Applicant Privacy Notice and agree to the use of your personal data as set out herein;
- your personal data may be transferred and processed worldwide, including countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Job Applicant Privacy Notice;
- you are not required to provide any requested information to us, but failing to do so may result in not being able to process your application; and
- you agree to allow Adtran to keep your personal data on file for 12 (twelve) months after notice of not offering you an employment in order to consider you for future employment opportunities.

## Updates to this Job Applicant Privacy Notice

This Job Applicant Privacy Notice may be updated periodically to reflect changes in Adtran’s practices. If we modify this notice, we will post the revised notice with an updated revision date, on <https://www.adva.com/en/about-us/legal/privacy-statement> , in our job offerings and in other relevant material.

[ ] I have read and agree to the terms of the Job Applicant Privacy Notice.

---

Place/Date of signature