

APPLICANT PRIVACY STATEMENT

Last updated 12. September 2025

Your privacy is important to us and to Société Générale Group to which Ayvens belongs. This is a matter of priority for us and we have implemented strong principles in that respect, especially in regards of the EU General Data Protection Regulation. Ayvens and its affiliated entities (hereafter “**Ayvens**”) value the trust of applicants and candidates and are committed to protecting their personal data.

This Applicant Privacy Statement (the “**Statement**”) describes our practices in connection with the personal information (“**Personal Data**”) that we collect through the careers section of the websites of Ayvens the “**Careers Site**”) and offline in connection with your application for a job or internship with Ayvens. Please note that the Careers Site is not intended for persons under the age of sixteen (16).

Personal Data submitted elsewhere on Ayvens’ and its affiliates’ websites will be used in accordance with our [global privacy statement](#).

1. WHO ARE WE?

Ayvens is a brand of ALD Autoleasing D GmbH, which is responsible for the processing of your Personal Data (controller).

Address: ALD Autoleasing D GmbH
Nedderfeld 95
22529 Hamburg

Ayvens may also be referred to as “**we**”, “**our**” or “**us**”.

2. WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

We collect and process information about you for a variety of reasons. Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, storage or erasure (“**Processing**”).

Where we process your Personal Data based on your consent, your decision to provide Personal Data to Ayvens is voluntary. Where the provision of Personal Data is a statutory or contractual requirement, or a requirement to enter into the employment agreement, we will inform you about this. If we collect or process Personal Data based on your consent, you may withdraw your consent at any time without negative consequences. The withdrawal of consent shall not affect the lawfulness of the processing based on such consent before its withdrawal.

We collect information provided by you in connection with your application, including:

- Name, surname, address, telephone number, e-mail address and other contact information;
- Work authorization status;
- Curriculum vitae (CV), motivation and/or cover letter as well as the attachments Upload for this, previous work experience and career history, education information, qualifications, salary preference and governmental confirmation of good conduct;
- Skills and experience;
- Professional and other work-related licenses, permits and certifications held, where applicable;
- In the case of pre-employment background checks, gender, date and place of birth and nationality when the screening for sanctions and embargoes renders a hit and further analysis needs to be conducted;

- Results of assessments, such as pre-employment background checks, if this is part of the application process;
- Information relating to references; and
- Any other information you provide us with (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships).

Ayvens is an equal opportunity employer, which means we offer equal treatment to all applicants. In certain cases, depending on local rules and regulations, we are required to ask questions about racial or ethnic origin, gender, and disability of our applicants, for purposes of monitoring equal opportunity in our recruitment process. If not required by law, we can ask you to provide this information for the same purposes, which you can provide on a voluntarily basis. The relevant job vacancy will indicate whether the information is mandatory or voluntary. Otherwise, we ask that you avoid submitting information which may qualify as sensitive information and/or special categories of personal data under applicable law, except where such information is legally required.

Sensitive information and/or special categories of Personal Data include nationality or national origin, age, gender identity, marital status, racial or ethnic origin, religious or philosophical beliefs, sexual preferences or sexual orientation, physical or mental health information (including disability status), genetic or biometric information, political opinions or trade union membership, veteran status, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings.

Any information you submit through the Careers Site must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action up to and including termination of employment in the course of your employment with Ayvens. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights.

If you provide us with Personal Data of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual for the data processing prior to providing the information to us.

Provided you have given your consent, we will add your personal application data to an Ayvens candidate pool so that we can access your documents again at the appropriate time and when a suitable vacancy arises.

If you apply via the Ayvens Career Site, we also refer you to the global privacy policy for applicants of the Ayvens Group, which operates the Career Site: <https://www.ayvens.com/en-cp/careers/ayvens-global-applicant-privacy-statement/>

3. HOW DO WE COLLECT YOUR PERSONAL DATA?

We and our service providers collect Personal Data in a variety of ways, including:

- **Through the Careers Site.** For example, when you submit your CV or apply for a job.
- **Offline.** For example, when you send us your CV by post or provide Personal Data by telephone. Otherwise, we process your personal data, for example, in the context of the job interview.
- **From Other Sources.** Such as LinkedIn and recruitment agencies.
- **For the purpose of pre-employment background check reports** in connection with your application, to the extent that you actively name them as references and as permitted by applicable law, Ayvens obtains information about you from other sources, which include:

- Your references;
- Prior employers; and
- Educational institutions you attended.
- **For the purpose of background check reports** in connection with a job offer provided to you, and as permitted by applicable law, Ayvens may obtain information from you about you, your dependents and/or anyone else in connection with you, for the purposes of:
 - Conduct and ethics;
 - Sanctions and embargoes;
 - Anti-money laundering and counter-terrorism regulations;
 - Preventing (the appearance of) a conflict of interest;
 - The fight against corruption and influence peddling; and
 - U.S. person identification.
- **Through cookies and other tracking technologies.** We and our service providers use “cookies” and similar technologies on the Careers Site. Please see our [Cookie & Similar Technologies Statement](#) for more information.
- **Assessments.** When an assessment is part of an application process e.g. in the form of an assessment center, we receive the results of this assessment. It may be that we obtain this automatically after an assessment has been completed via an external party or that you share the outcome of an assessment with us.

4. WHY DO WE USE YOUR PERSONAL DATA?

We collect and process Personal Data about you for one or more of these reasons:

- a) Because this information is necessary to take steps prior to entering into an employment or internship;
- b) Because this information is of particular importance to us and we have a specific legitimate interest to process it;
- c) To comply with a legal obligation;
- d) Because you voluntarily provide this information and consent for us to process it.

Where the collection or processing is based on your consent, you are free to refuse or withdraw consent at any time, without negative consequence to your application, to the extent permitted by applicable law. The withdrawal of consent shall not affect the lawfulness of the data processing based on such consent before its withdrawal.

The information that you submit on the Careers Site will be used for Ayvens’ global personnel recruitment, management and planning purposes, as permitted by applicable law:

- **To process your application.** We will engage in these activities to manage our prospective contractual relationship with you and because the processing of applications corresponds to our legitimate interest in filling vacant positions;
- **To assess your capabilities and qualifications for a job.** We will engage in these activities to manage our prospective contractual relationship with you, where we have a legitimate interest to do so;
- **To perform reference checks.** Certain vacancies require the provision of specific references. In such case, we use information to conduct reference checks. We will engage in these activities to comply with a legal obligation or where we have a legitimate interest to do so;
- **To communicate with you.** We will communicate with you about your application, and to send you information regarding the Careers Site and changes to our terms and policies, e.g. via e-mail. We will engage in these activities to manage our prospective contractual relationship with you;
- **To comply with or monitor compliance with any applicable law or regulation.** We will engage in these activities to comply with a legal obligation or where we have a legitimate interest to do so.

- **To perform pre-employment background checks.** Certain job offers require a pre-employment background check. In such case, we use information to conduct background checks if we offer you a position. We will engage in these activities to comply with a legal obligation or where we have a legitimate interest to do so. The pre-employment background checks have the aim to guarantee the reliability, professionalism and security of Ayvens as well as global security, integrity of the financial system, financial stability and sustainable growth;
- **Legitimate business purposes.** Where we have a legitimate business interest to do so, for example, for Ayvens' administrative purposes, internal aggregate management reporting or internal training; and
- **With your explicit consent**, but only for purposes where we request information that you can provide on a voluntary basis, such as consent to process diversity information for purposes of monitoring equal opportunity of our recruitment process.

If we hire you, Personal Data we collect in connection with your application can be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes.

Providing Personal Data to us through the Careers Site is voluntary. However, if you do not provide sufficient information, Ayvens may be unable to consider your employment application or, if you are hired, your subsequent promotion, transfer or relocation.

5. WHO HAS ACCESS TO YOUR DATA?

We will limit access to Personal Data to personnel with a business need to know for the purposes described in this Statement, including personnel in the recruiting, human resources and information technology departments, and in the department responsible for your interview and/or for the position for which you are applying.

Ayvens also shares Personal Data with our third-party service partners or providers to facilitate services they provide to us, including hosting and operating the Careers Site, recruiting assistance, assessments, and background check processing.

6. WHY PERSONAL DATA MAY BE TRANSFERRED TO THIRD COUNTRIES?

Ayvens is a global service provider that has clients and locations around the globe. For a list of the Ayvens affiliates and their locations, please visit our website.

The Personal Data we process for your application may be transferred to Ayvens organisations and our service providers in other countries than your country of residence. Some countries are considered to provide for an adequate level of protection of your Personal Data, according to EU standards. You can find a list of these 'adequate countries' [here](#). For the transfer of Personal Data to other countries, Ayvens has put in place adequate measures to protect your Personal Data, such as Standard Contractual Clauses.

7. WHO WE DISCLOSE YOUR DATA TO?

We also use and disclose your Personal Data as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- **To respond to requests from public and government authorities;**
 - These can include authorities outside your country of residence.
- **To cooperate with law enforcement;**
 - For example, when we receive law enforcement requests and orders;
- **To enforce our terms and conditions;** and

- **To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.**

8. DO WE USE YOUR DATA FOR OTHER PURPOSES?

We may also use your Personal Data for a purpose other than the initial purpose. This is subject to the condition that the secondary purpose is in line with the initial purpose. The following factors are inter alia taken into account: are the purposes clearly related; is the secondary purpose appropriate and/or expected, was the Personal Data obtained directly from you or in another way; what kind of Personal Data is concerned for the secondary purpose; what would be the implications for you; and what data protection measures are applied when using your data for the secondary purposes.

9. HOW LONG WILL WE KEEP YOUR DATA?

Personal Data of applicants applying for a job will be kept for the duration of six months after the application process is closed. If you have consented to being included in the Ayvens candidate pool, your data will be stored in the candidate pool for a further six months. We are in that case able to approach you for possible vacancies in the future. After the relevant retention period, Ayvens will delete your Personal Data.

10. HOW DO WE SECURE YOUR DATA?

Ayvens will take appropriate organizational, technical and administrative in accordance with applicable privacy and data protection laws and regulations, including requiring service providers to use appropriate measures to protect the confidentiality and security of Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please notify us in accordance with the “*Contact Us*” section below immediately.

11. DOES THIS STATEMENT COVER THIRD-PARTY WEBSITES?

This Statement does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Careers Site links. The inclusion of a link on the Careers Site does not imply endorsement of the linked site or service by Ayvens or our affiliates.

12. WHAT IF YOU ALREADY HAVE A POSITION AT AYVENS?

If you currently work for Ayvens or one of our affiliates, you can use the Careers Site or preferably the internal careers site to apply for a different position within Ayvens. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with the HR manager for the new position concerning application eligibility, benefit programs and HR policies applicable to that position.

The Careers Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

13. CHANGES TO THIS STATEMENT

We reserve the right to amend this Statement at any time in order to address future developments of Ayvens, the Careers Site or changes in industry or legal trends. The “Last Updated” legend at the top of this Statement indicates when this Statement was last revised. Any changes will become effective when we post the revised Statement on the Careers Site.

14. HOW CAN YOU CONTACT US?

If you have questions, requests or complaints, please feel free to contact us via the contact page of the relevant Ayvens website, by contacting Autoleasing D GmbH, Nedderfeld 95, 22529 Hamburg in writing or by sending an email message to hrprivacy@ayvens.com.

Because email communication is not always secure, please do not include sensitive personal information in the emails you send us.

15. HOW CAN I EXERCISE MY PERSONAL DATA SUBJECT RIGHTS?

If you register on the Careers Site, you may (i) access, (ii) review, (iii) change and (iv) delete your Personal Data stored therein by logging into the Careers Site and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change Personal Data that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your Personal Data if it changes or is inaccurate.

You also have the following rights:

a) Right to information and access

You have the right to request information and access from us at any time about the data we have stored about you, as well as its origin, recipients or categories of recipients to whom this data is passed on, and the purpose of storage.

b) Right of revocation

If you have given your consent to the use of data, you can revoke this consent at any time with effect for the future without giving reasons.

c) Right to correction

If the data we have stored about you is incorrect, you can request correction at any time.

d) Right to erasure and restriction of processing

You have the right to restrict and erase the personal data we have stored about you. If the erasure conflicts with legal, contractual, tax, or commercial retention obligations or other legally established reasons, your data can only be restricted instead of erased. Once your data has been deleted, it will no longer be possible to provide you with information. Application data will be deleted no later than 6 months after the end of the application process, unless you have consented to your data being included in the candidate pool. In this case, your data will be stored for a further 6 months.

e) Right to data portability

If you request the personal data you have provided to us, we will provide or transfer the data to you or another controller in a structured, commonly used, and machine-readable format. However, the latter will only be done if it is technically feasible.

f) Contact for asserting the rights of data subjects

When you contact us, we store the data you provide (your email address, your name and telephone number, if applicable) in order to answer your questions or respond to your request. We delete the data collected in this context once it is no longer necessary to store it, or restrict its processing if there are legal retention obligations.

g) Right to lodge a complaint with the supervisory authority

You have the right to lodge a complaint with the competent supervisory authority against the processing of your personal data if you believe that your rights under the GDPR have been violated.

You may also:

- Contact us at hrprivacy@ayvens.com with any questions about this Statement or contact ALD Autoleasing D GmbH, Nedderfeld 95, 22529 Hamburg in writing.
- Contact our local Data Protection Officer by email at datenschutz@aldautomotive.com
- File a complaint if you believe Ayvens violates its Privacy Policy for the Management of Employee Data or your rights under applicable privacy and data protection laws and regulations.

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