

# Data Privacy Statement

TRIUMPH attaches particular importance to the privacy and protection of personal data and compliance with data protection laws. Personal data submitted to us will be processed in strictly confidential manner and in accordance with data protection laws and according to this Data Privacy Statement and only for the purposes of recruitment process managed through our Application Tracking System (ATS).

Should you have any questions or suggestions regarding data protection and/or our Applicant Management System, please contact us: [recruitment.europe@triumph.com](mailto:recruitment.europe@triumph.com).

## § 1 Controller and Scope

The controller in the sense of the General Data Protection Regulation and other national data protection acts of the Member States as well as other data protection law directives is:

Triumph Holding

Address: Promenadenstrasse, 24 – CH5330 – Bad Zurzach

E-Mail: [recruitment.europe@triumph.com](mailto:recruitment.europe@triumph.com)

Website: [www.triumph.com](http://www.triumph.com)

This data privacy statement applies to the Triumph Recruitment Tool, which can be accessed under <https://eu3.advorto.com/TriumphInternational/LoginRegister.aspx> (hereinafter referred to as “our website”).

## § 2 Data Protection Officer

The controller can be contacted at:

E-Mail: [dpo@triumph.com](mailto:dpo@triumph.com)

## § 3 What are personal data?

Personal data are all information relating to an identified or identifiable natural person. This includes information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behaviour. Information with which we cannot (or only with a disproportionate effort) establish a reference to your person, e.g. by anonymizing the information, is not personal data. The processing of personal data (e.g. the collection, retrieval, use, storage or transmission) always requires a legal basis or your consent.

## § 4 General matters of data processing

### a) Scope and Purpose of the Processing

By entering your personal data, you give us permission to process your data for effective and correct execution of the recruitment process. You can revoke your permission at any time, which, however means that we cannot further process your application or consider you for future career opportunities within Triumph Group.

If you have applied for a specific role, your data will be made available to the hiring department. In case you sent in a general application, your data will be made available to the competent department whose then current job vacancies correspond to your qualification profile.

If your application does not qualify for the applied specific role, we may try to match your profile to other relevant positions within the TRIUMPH Group. There will be no transfer of your applicant data to companies outside the TRIUMPH Group.

## **b) Legal Basis**

Art. 6 para. 1 lit. f GDPR serves as the legal basis for the data processing. The processing of the mentioned data is necessary for the provision of our services and thus serves the protection of a legitimate interest of our company.

## **c) Data Deletion and Duration of Storage**

We will delete your personal data no later than 12 months from the last date of contact with us. However, you reserve the right to ask us to delete your personal data any time before the end of 12 month period.

## **§ 5 Data Transfer to Third Parties**

In some countries, the Triumph Group may use the support of third party providers in handling data. In particular, Triumph Group has appointed as a RPO partner Alexander Mann Solution.

In this case, Triumph will ensure that the data will only be used for purposes of recruitment and in accordance with applicable data protection laws. Triumph will take all reasonable steps to protect your personal data and prevent unauthorized access.

## **§ 6 Your Rights as a Data Subject**

If your personal data are processed, you are a data subject within the meaning of the General Data Protection Regulation (GDPR) and the following rights apply to you:

- Pursuant to Art. 15 GDPR you can request information about your personal data processed by us. In particular, you may obtain information about the purposes of processing, the categories of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned storage period, the existence of a right to correction, deletion, restriction of processing or objection, the right to lodge a complaint with a supervisory authority, the origin of your data, if not collected from us, about transfer to third countries or international organisations, and the existence of automated decision-making, including profiling and, where applicable, meaningful information about the logic involved.
- Pursuant to Art. 16 GDPR you can immediately demand the correction of incorrect data or the completion of your personal data stored with us.
- Pursuant to Art. 17 GDPR, you may request the deletion of your personal data stored by us, provided that the processing is not necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.
- Pursuant to Art. 18 GDPR, you can request the restriction of the processing of your personal data if you contest the accuracy of the data, if the processing is unlawful, if we no longer need the data and if you refuse their deletion because

you need to establish, exercise or defend legal claims. You are also entitled to the right under Art. 18 GDPR if you have objected to the processing in accordance with Art. 21 GDPR.

- Pursuant to Art. 20 GDPR, you may request that the personal data you have provided us with be received in a structured, current and machine-readable format or you may request that it be transmitted to another person responsible.
- Pursuant to Art. 7 para. 3 GDPR you can withdraw your consent at any time. As a consequence, we are no longer allowed to continue the data processing based on this consent for the future.
- Pursuant to Art. 77 GDPR, you have the right to complain to a supervisory authority. You can contact the supervisory authority of your habitual residence, place of work or our company headquarters.

## **§ 7 Right to Object**

When processing of your personal data is based on legitimate interests pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR, you have – as already mentioned above – the right to object to the processing of your personal data pursuant to Art. 21 GDPR, provided that there are reasons arising from your particular situation.

## **§ 8 Data Security and Security Measures**

We commit ourselves to protecting your privacy and to treat your personal data confidentially. In order to prevent manipulation, loss or misuse of your data stored with us, we take extensive technical and organizational measures, which are regularly checked and adapted to technological progress.

However, we would like to point out that due to the structure of the internet, it is possible that the rules of data protection and the above mentioned security measures may not be observed by other persons or institutions for which we are not responsible. In particular, unencrypted data - e.g. if this is done by e-mail - can be read by third parties. We have no technical influence on this. It is the responsibility of the user to protect the data provided by him against misuse by encryption or in any other way.