

**EFFECTIVE DATE: JANUARY 22, 2020**

## **A-T Controls HR Privacy Statement for Job Applicants**

### **1. Who is responsible for processing my data?**

This is the privacy statement A-T Controls, Inc. for Job Applicants.

A-T Controls, Inc. is located at 9955 International Blvd., Cincinnati, OH 45246. We are affiliated with Pon Holdings B.V. its affiliates and its subsidiaries. We are responsible for processing your personal data, as described in this privacy statement. Handling your information with care is important to us.

### **2. When is this privacy statement applicable?**

This privacy statement is applicable to all data collected and processed by A-T Controls when you apply for a job with us.

### **3. What personal information data does A-T Controls collect and process when I submit an application?**

When you apply for a job with us, we collect personal data from you to assess whether you could join our team. We may process the following information:

- Your name, address, email address and other contact information.
- Your race, gender and ethnicity.
- Résumé and letter of application, information about your educational background, internships, work experience and additional data that you provide us with, such as your hobbies and family situation.
- Photos and videos that you submit with your application.
- Results from tests and assessments that are shared with A-T Controls after your approval.
- How far you got in the application process and reasons for either hiring or rejecting you.

### **4. Why do we collect your data?**

We collect and process your personal data on the basis of the principles laid out in the General Data Protection Regulation, the California Consumer Privacy Act and other applicable laws. We do this for the following purposes:

- Processing your application and personally communicating with you about it (basis: legitimate interest).
- Providing an offer of employment to you (basis: legitimate interest)
- When applicable, possibly concluding a work contract with you (basis: contractual agreement)
- Conducting and sharing statistical analyses to improve our application process (basis: legitimate interest).
- Compliance with our legal responsibilities (basis: legal obligation).
- Meeting our agreements with businesses that we collaborate with for recruitment purposes (basis: legitimate interest).
- Compliance with our responsibilities as a federal contractor or subcontractor according to OFCCP regulations to collect information about the gender, race and ethnicity of each applicant for employment. (basis: legal obligation)

## **5. How long does A-T Controls store my data?**

The data collected in furtherance of your job application as described above will not be retained for any longer than is necessary for the purpose for which the data were collected, to comply with local statutory obligations, for purposes of dispute resolution and/or enforcement of employment or other agreements with third parties.

## **6. Will my data be sold to or shared with other businesses?**

We do not sell your data to other businesses for commercial purposes. When necessary, businesses that assist us in finding new team members are given access to data to conduct activities on A-T Control's behalf. A-T Controls maintains processing agreements with these businesses to ensure appropriate safeguards are in place to protect data that is shared.

## **7. Does A-T Controls use cookies?**

Yes, we use cookies for our websites. Cookies are small (temporary) files placed in your browser by a website, whether on your computer, cell phone or tablet. These cookies allow you to visit our website without filling in the same information each time. Cookies make it possible for you to see the job openings that are most interesting for you. They also allow us to keep track of things like how often our websites are visited and which job openings are popular.

## **8. What kinds of cookies does A-T Controls use and why?**

Our websites use four types of cookies:

- **Functional cookies**

These cookies allow our websites to work properly. For example, by using these cookies we can ensure that our websites are displayed with the correct screen dimensions for your device.

- **Analytic cookies**

These cookies allow us to help you find the best job openings. They also help us measure how often our websites are visited and what components of our websites are viewed most often. Using this data allows us to improve our websites.

- **Advertising / tracking cookies**

We use these cookies to do things like collecting data concerning the surfing behavior of visitors to our website. This data allows us to draw your attention to job openings of interest of you through advertisements.

- **Social media cookies**

We use these cookies to share content from our websites on social media.

## **9. Can I select what kinds of cookies A-T Controls uses?**

Yes, you can. On our cookie bar you can decide what kinds of cookies we are and are not permitted to use. You can change your settings whenever you wish.

## **10. Can I remove cookies?**

Yes, you can do so at any time. How you do this depends on your browser. The [aboutcookies.org](http://aboutcookies.org) site has information explaining how to do this on the various browsers. However, bear in mind that removing cookies may affect website performance.

### **11. Is this privacy statement subject to change?**

This privacy statement may change, such as when required by new developments or new regulations. The most current privacy statement can always be found on our websites. We always state the date on which the latest version on the website was published. If you check this regularly, taking note of that date, you will always be aware of possible changes.

### **12. How is my data protected?**

A-T Controls will take appropriate technical and organizational security measures to safeguard against the loss or unlawful processing of your personal data. These may include the use of secure registration forms, data encryption and restricting access to your personal data. Certain countries do not have adequate protection standards for personal data. However, A-T Controls will take appropriate protection measures regarding confidentiality and access to your data.

### **13. What are my rights?**

**Under the General Data Protection Regulation:** You may inquire at any time about data of yours that we have stored, how we obtained it and how we use it. You also have the right to ask us to modify, block or remove your data. Simply email us at [privacy@pon.com](mailto:privacy@pon.com). Alternatively, you have the right to lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities is available at [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

**Under the California Consumer Privacy Act:** California residents who provide personal information to us for the purposes solely relating to employment (such as when applying for a job) are entitled to be informed about what categories of data are collected, for which purposes this data are collected, and how such information is used and to whom it is disclosed. Please contact [privacy@pon.com](mailto:privacy@pon.com) for inquiries.

### **14. Where can I go for questions about this privacy statement?**

Would you like to know more or is something not completely clear? Please contact us at [privacy@pon.com](mailto:privacy@pon.com). We will be happy to assist you.