

Privacy Notice of DWFritz Automation, Inc. Candidates and Employees

DWFritz is committed to respecting your privacy. This Privacy Notice describes how we collect, use, and retain information or data that you, the Data Subject, provide to our Recruitment and Human Resources team. Data Subjects in this notice refers to candidates who are under consideration for employment, as well as current employees of the Company. This notice also describes our methods of collecting, processing, maintaining, protecting, and disclosing that information.

This Privacy Notice applies to data we collect:

- Via email, text, and other electronic means between you and members of our Recruitment and Human Resources team;
- Through Applicant Tracking Systems, such as Avionte, utilized by DWFritz;
- Through third-party background check services such as Open Online. Note: in order to comply with GDPR regulations, this is applicable for U.S. candidates/employees only; and
- Through third-party platforms such as Indeed, LinkedIn, Velocity Global (PEGA), etc.

What Data Do We Collect?

Our Company may collect, use, and retain personal information, including, but not limited to:

- **Identity Data** such as name, birth date, resume/CV, Driver's License, and Passport.
- **Contact Data** such as email addresses, telephone numbers, and residential addresses (including historical information).
- **Profile Data** such as employment and educational history, job application, or social media profiles.
- **Financial Data** such as tax information and salaries. Please note that payment methods, specifically bank account details submitted to our payroll software, are not collected by us directly. Please review the Privacy Notice for any third-parties where you submit personal information.

How is Data Collected?

We use different methods to collect personal data.

- **Direct Interaction** includes personal data provided by the Data Subjected, communication with a representative of the Company, or otherwise. Some examples include, but are not limited to:
 - Filling out an employment application found on our "Careers" webpage at www.dwfritz.com.
 - Emailing, calling, or mailing information (e.g., resume/CV) to a member of our Recruitment and Human Resources team.
 - Requesting information from the Company.

- **Third Parties** includes personal data we receive from various third parties such as job boards, networking sites, background check companies, etc. (e.g., Indeed, LinkedIn, Open Online, and more).

Purpose of Processing: How we use your data

We will use personal data only as permitted by law, such as in the following circumstances:

- To recruit candidates for employment with the Company;
- To verify a potential employee's identity, highest level of education received, employment history, residence history, and criminal history as permitted by law where information is collected; and
- To perform standard Human Resources functions of the Company such as payroll processing, I-9 processing, processing of medical and paid time off benefits, etc.

Legal Basis for Processing

There are a limited number of scenarios in which data processing is legally permitted. The scenarios applicable to the terms of this document fall into the following categories:

- **Legitimate Interest** means that the processing of personal data is a necessity in order to identify candidates for potential employment. Any impact on the Data Subjects is considered prior to processing. Note that we do not use personal data for activities that would otherwise conflict with the rights of the Data Subjects
- **Performance of a Contract** means that it is necessary to process personal data prior to potentially entering into, and in execution of, a contract between the Data Subject and the Company.
- **Consent** means that as a Data Subject, access to our use of specified personal data has been freely-given based on an informed decision.

Note: At any point in time, you may withdraw consent. This can be done by contacting our Human Resources team at HR@DWFritz.com. If consent is withdrawn, we will no longer be able to consider your application for employment.

Who We Share Your Data With

For employees within the EU, personal data is shared with a third-party payroll provider, Velocity Global and a third-party benefits broker, Verilingue.

Candidates in the United States are sent a background check authorization form that allows them to provide explicit consent for their personal data to be accessed and processed by a third-party background check service.

Data relating to employment records or recruitment may be disclosed to organizations outside of the EU, including the DWFritz U.S. office, DWFritz internal servers (Microsoft), UltiPro, Velocity Global, and insurance and benefit brokers and carriers.

Data Subject Access Rights

If you have questions about the type of personal data we have, or if you want to modify, restrict, or delete your personal data, please reach out to the Data Protection Officer (DPO) at DPO@DWFRitz.com.

Employee and candidate data will be retained according to U.S. and E.U. data protection laws respectively.

Data Subjects in the E.U. have the following rights which we would like to extend to all Data Subjects regardless of location:

Your Rights	What You Can Request
Right to Access	The right to be provided with a copy of your Personal Data. Note that a small fee may be charged for this service
Right to Rectification	The right to require us to correct incomplete or inaccurate Personal Data we have about you
Right to Erasure/To be Forgotten	The right to ask us to delete Personal Data when there is no legitimate reason for processing. If we are unable to comply with your request, we will notify you within 48 hours
Right to Restrict Processing	The right to require us to restrict Personal Data processing, where applicable.
Right to Request Data Portability	The right to request transfer of your Personal Data in a commonly used, machine-readable format.
Right to Object to Processing	The right to object to the processing of your Personal Data.
Right to Withdraw Consent at any Time	The right to withdraw your consent at any time in which we rely on your consent to process your Personal Data.

How We Protect Your Data

DWFritz ensures that any personal data transferred to the U.S. is secured using ISO 27001 security protocols, which prescribe organizational policies, procedures, and practices that protect the confidentiality, integrity, and availability of data held by the organization. DWFritz also complies with GDPR privacy standards, including privacy by design.

Members of our U.S. Recruitment and Human Resources team have access to personal data belonging to all employees and candidates as needed.

If you have any questions regarding personal data practices by DWFritz, please contact our Data Protection Officer below.

Contact the Data Protection Officer

Email Address	Mailing Address
DPO@DWFritz.com	DWFritz Automation, Inc. Attn: Data Protection Officer 9600 SW Boeckman Road Wilsonville, OR 97070 U.S.A.

Underage Users

DWFritz does not intend to solicit or collect personal data from anyone under the age of 18. If you are under 18, do not enter information on this Site, or engage in our services. If you believe a minor, under the age of 18, has entered personal data information on our Site, please contact us at DPO@DWFritz.com to have the data removed and to terminate the minor's account.

Changes in the Privacy Notice

DWFritz reserves the right to amend the Privacy Notice from time to time at its sole discretion, and will provide notice by email, or on the homepage of the Site, when we make material changes to this notice, prior to the change becoming effective.

Version History

Version	Date	Revision Author	Summary of Changes
1	05/13/2020	Carrie Koble	Develop stage 1 policy