

## **Camplify Holdings Limited – Privacy Notice for Recruitment**

**Camplify Holdings Limited** (“CHL” “We”, “Us”) are committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with our recruitment processes. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

We recruit for CHL Group companies in the European Union, the United Kingdom, Australia and New Zealand. In each of these jurisdictions We are responsible for collecting and processing your personal data in accordance with applicable privacy law.

### **EU & UK Candidates – GDPR**

For candidates in the EU, We are responsible under the General Data Protection Regulation (“GDPR”), for the processing of personal data of the applicant (“you”) as part of your application to us. Likewise for candidates in the United Kingdom, where the GDPR is retained under UK law as the UK GDPR.

Below We will inform you clearly as part of our information obligations (Art. 13 ff. GDPR) about which data will be processed in your application and on what legal basis this happens. You will also receive information about what rights you have towards us and towards the relevant supervisory authority.

### **Information about the person responsible and basis of processing**

Camplify Holdings Ltd is the controller of the recruitment process:

Camplify Holdings Limited

42 Union St,

Wickham, NSW 2293 Australia

Email: [chl-people-and-culture@camplify.com.au](mailto:chl-people-and-culture@camplify.com.au)

Your personal data will be accessible, via the Workable Platform, by our global People and Culture team based in our Australian Head Office. Where the job opening reports to a hiring manager in Australia (as specified in the advertisement) or is a senior position your personal data may be processed by the hiring manager and senior executives located in Australia.

For job openings at:

- PaulCamper GmbH, PaulCamper is a joint controller of the recruitment process:

PaulCamper GmbH,

[people@paulcamper.de](mailto:people@paulcamper.de)

PaulCamper has also appointed a company data protection officer:

Michael Nightingale

c/o DS Compliance GmbH

Carlsplatz 24

40213 Düsseldorf

- MyWay Insurance Europe GmbH, MyWay Insurance Europe is a joint controller of the recruitment process:

MyWay Insurance Europe GmbH

[chl-people-and-culture@camplify.com.au](mailto:chl-people-and-culture@camplify.com.au)

- Camplify Co (Portugal) – Unipessoal Lda, Camplify Co (Portugal) is a joint controller of the recruitment process:

Camplify Co (Portugal) – Unipessoal Lda

[chl-people-and-culture@camplify.com.au](mailto:chl-people-and-culture@camplify.com.au)

- Camplify Co (UK) Ltd, Camplify Co (UK) is a joint controller of the recruitment process:

Camplify Co (UK) Ltd

[chl-people-and-culture@camplify.com.au](mailto:chl-people-and-culture@camplify.com.au)

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the recruitment of staff for Our business.

Section 26 BDSG also applies to German candidates and job openings at MyWay Insurance Europe GmbH and PaulCamper GmbH.

## **Your rights**

Under the GDPR you have a number of important rights. In summary, those include rights to:

a) Access

You have the right to request confirmation from Us as to whether We are processing your personal data. If We process your personal data, you have the right to receive supplementary information that this Privacy Notice is designed to provide.

b) Rectification

You have the right to require Us to correct any mistakes in your information which We hold.

c) Erasure of personal data

In certain situations, you have the right to request that We delete your personal data. This is the case, for example, if We no longer need your personal data for the purposes for which We collected the data or if We have processed your data unlawfully. Another example would be that We process your data based on your consent, you revoke your consent and We do not process the data based on any other legal basis. However, your right to deletion does not always apply. For example, We may process your personal data to comply with a legal obligation or because We need it for a legal dispute.

d) Restriction of processing

Under certain conditions, you have the right to request that We restrict the processing of your personal data. An example of this is if you dispute the accuracy of your personal data and We need to verify the accuracy for a certain period of time. Your data will only be processed to a limited extent for the duration of the examination. Another example of the restriction is if We no longer need your data, but you need it for a legal dispute

e) Object to processing

You have the right, for reasons arising from your particular situation, to object at any time to the processing of your personal data, which is based on legitimate interests.

Following an objection, We will no longer process your personal data unless We can demonstrate compelling legitimate reasons for the processing that

outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

f) Right to data portability

Under certain conditions, you have the right to receive the personal data you have provided to Us in a structured, commonly used and machine-readable format and the right to have this data transmitted to another controller. This is the case if We process the data either based on your consent or based on a contract with you and We process the data using automated procedures.

You have the right to request that We transmit your personal data directly to another person responsible, as long as this is technically feasible and the freedoms and rights of other people are not impaired.

g) Automated decision making

You have the right to object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.

If you would like to exercise any of those rights, please:

- contact Us using Our Contact details above;
- let Us have enough information to identify you;
- let Us have proof of your identity and address; and
- let Us know the information to which your request relates.

### **How to complain**

We hope that We can resolve any query or concern you raise about Our use of your information.

The GDPR also gives you the right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

The supervisory authority in the UK is the Information Commissioner who may be contacted at <http://ico.org.uk/concerns/> or telephone: +44 303-123-1113.

### **Processing information – all Candidates**

We use Workable, an online application provided by Workable Software Limited, to assist with Our recruitment process. We use Workable to process personal information as a data processor on Our behalf. Workable is only entitled to process your personal data in accordance with Our instructions.

Where you apply for a job opening posted by Us, these Privacy Notice provisions will apply to Our processing of your personal information in addition to Our general Privacy Notices which are available on the Camplify, MyWay and PaulCamper platform Websites.

Where you apply for a job opening via the application function on a job site or similar online service provider ("Partner"), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner's Privacy Notice.

If you apply for a job opening with Us the personal data you provide will be processed by us to evaluate and process your job application. Your application will be viewed in Workable by our employees who are responsible for pre-selection and recruitment of the job position for which you have applied.

### **Information we collect from you**

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history, skills experience that you provide to Us, as well as your video in case you conduct your interview using the Video Interview feature.
- If you contact Us, We may keep a record of that correspondence.
- A record of your progress through any hiring process that We may conduct.
- Details of your visits to Workable's Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Workable's Website and the resources that you access.

### **Specific to Portugal:**

If you are verbally offered and accept a position, we are required by law to include personal data in your employment contract that was not supplied through the application process. E.g, social security number, tax file details, citizen card number, we will invite you to join our HRIS, HiBob so that the data is uploaded directly to a secure platform. Once it is collected we will issue you that employment contract via

Workable. Alternatively, you may request to supply any personal information required for your employment by an alternative means e.g., email. If you choose to upload via our HRIS system HiBob you must review the [HiBob end users terms of use here](#).

### **Information we collect from other sources**

Workable provides Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.

Workable's technology allows Us to search various databases – some publicly available and others not, which may include your personal data (including your CV or Resumé), to find possible candidates to fill Our job openings. Where We find you in this way We will obtain your personal data from these sources.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for Our business more generally. This could include an external recruiter who we invite to collaborate with Us on our Workable account. They will not have access to all candidates on Workable, only candidates who they have presented for our consideration.

### **Purposes of processing**

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that We receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill Our job openings.
- To help Our service providers (such as Workable and its processors and data providers) and Partners (such as the job sites through which you may have applied) improve their services.

### **Automated decision making/profiling**

We may use Workable's technology to select appropriate candidates for Us to consider based on criteria expressly identified by Us, or typical in relation to the role for which you have applied. We may also use Workable to automatically screen out candidates who do not meet Our screening questions for the job opening (e.g. have answered 'no' to a question regarding a key requirement).

The process of finding suitable candidates is automatic, however, any decision as to who We will engage to fill the job opening will be made by Our staff.

### **Disclosure of Your Information**

As set out above, We pass your information to Workable, who use it only in accordance with Our instructions and as otherwise required by law.

Where you have applied for a job opening through the Indeed Apply functionality, and where you have consented to this disclosure, We will disclose to Indeed certain personal data that We hold, including but not limited to a unique identifier used by Indeed to identify you, and information about your progress through Our hiring process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that We hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively "Disposition Data"). Indeed's Privacy Notice in respect of Indeed's use of the Disposition Data is available on Indeed's website.

Where you have applied to a job opening through another service provider, We may disclose data similar to the Disposition Data defined above to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us.

### **Integrations**

Workable has built-in email and calendar options which have been connected to our Company's Google Suite account. Our employees are able to sync their Google accounts to Workable to send candidates emails and links to their calendar for the purposes of scheduling interviews.

We have integrated our Workable account with a third party supplier, [Pipplet](#) for the purposes of assessing candidates language skills. If you are requested to complete a language assessment test through Pipplet you may request an alternative means of assessment. If you choose to complete a Pipplet language assessment test you must agree to the Pipplet language assessment platform's [terms of use](#).

We have integrated our Workable account with a third party supplier, [Certn](#) for the purposes of identity checks, background checks and reference checks. You will only be asked to complete these checks if:

- you are the preferred candidate; and
- to the extent permitted by applicable law

If you choose to complete a Certn check you must agree to the Certn platform's [terms of use](#).

Workable has a built-in e-sign function with a third party supplier [Dropbox Sign](#) to enable candidates to electronically sign an employment contract for the purposes of executing the contract in electronic transmission. You may choose not to electronically sign the document and request to sign the document through alternative means, such as manually. If you choose to electronically sign you must agree to Dropbox Sign's [Official Terms of Service](#).

## **How We Store Your Personal Data**

### **Security**

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of any data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect your personal data, We cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

### **Where We store your personal data**

Where We store your personal data in Our own systems, it is stored in Google Suite. Google Suite data is stored in the United States and Europe.

The data that We collect from you and process using Workable's Services may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). By submitting your personal data, you agree to this transfer, storing or processing.

In particular, your data may be accessible to i) Workable's staff in the USA or ii) may be stored by Workable's hosting service provider on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the United Kingdom and EEA. A Data Processor Agreement has been signed between Workable Software



Limited and its overseas group companies, and between Workable Software Limited and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

If you would like further information please contact Us.

### **How long We keep your personal data**

We delete personal data of rejected applicants once every 6 months. If We reject your application, We will only store your data at most for a period of six months, unless you give us your consent to store your data for longer in order to be considered for other job openings. In this case, We will store your data in our talent pool for a further 2 years. You can revoke your consent at any time.

### **Contact**

All questions, comments and requests regarding this Privacy Notice should be addressed to [chl-people-and-culture@camplify.com.au](mailto:chl-people-and-culture@camplify.com.au)