

INTERNAL AND EXTERNAL RECRUITMENT PRIVACY NOTICE OF IBIDEN EUROPE B.V.

The aim of this privacy notice (the “**Privacy Notice**”) is to provide you, as the subject of the data processing (“**You**”) with information about processing of Your personal data and about Your data privacy rights in connection with such processing activities in accordance with regulation (EU) 2016/679 of the European Parliament and of the Council (the “**GDPR**”) and with the data privacy laws applicable in the relevant jurisdiction (the “**Local Data Privacy Laws**”).

1. Data controller

This section contains the name, firm data and contact information of the data controller.

Data controller	
IBIDEN Europe B.V.	Name: IBIDEN Europe B.V. (“ IBIDEN ”)
	Address: Polarisavenue 85f, 2132 JH, Hoofddorp, the Netherlands
	Telephone: +31 23 554 3180
	E-mail: iecu_privacy@ibiden.com

IBIDEN, as the data controller can be addressed with any question regarding the data processing activity and/or in connection with exercising any data privacy rights.

2. Data privacy rights

With any comment, question, complaint and any other request in connection with the processing of Your personal data we encourage You to contact directly IBIDEN, who shall provide You with a response without undue delay, but no later within one month from the receipt of Your request. This reply deadline may be extended by two further months where necessary, taking into account the complexity and number of requests. If the need for such extension would occur, then IBIDEN shall inform You within the original deadline, together with the reasons for the extension.

For contact information, please see section 1 of this Privacy Notice.

You have certain rights in connection with the processing of Your personal data (data privacy rights), which might differ regarding each data processing activities. Below You will find a short description of Your possible data privacy rights, and in section 4 below we have indicated at each data processing activity the data privacy rights you are entitled to exercise. Please note, that the GDPR and in some cases the Local Data Privacy Laws might set further conditions and/or limitations in connection with the exercising these rights. Therefore, we advise You to closely study this Privacy Notice, the GDPR and the applicable Local Data Privacy Laws before filing a request.

Link to the GDPR (*Regulation (EU) 2016/679 of the European Parliament and of the Council*): [link](#)

(a) **Withdrawal of consent** (subsection (3) of Article 7 of the GDPR)

You have the right to withdraw your consent granted for a specific data processing activity any time. Please note, that the withdrawal of Your consent does not affect the lawfulness of processing based on consent before its withdrawal.

(b) **Access** (Article 15 of the GDPR) (Article 15 of the GDPR)

You have the right to request confirmation from the data controller as to whether or not personal data concerning You are being processed, and where that is the case, access to the personal data and certain information determined in Article 15 of the GDPR.

(c) **Rectification** (Article 16 of the GDPR)

You have the right to request the controller to rectify any inaccurate personal data concerning You without any undue delay. Taking into account the purposes of the processing, You have the right to have the incomplete personal data completed, including by means of providing a supplementary statement.

(d) **Right to erasure** ('right to be forgotten') (Article 17 of the GDPR)

You have the right to request the erasure of Your personal data if any of the grounds in of Article 17(1) of the GDPR apply. If the exceptions in Article 17(3) of the GDPR do not apply and/or IBIDEN does not have any legal ground to further process Your personal data, than it shall execute the request for deletion with undue delay.

(e) **Restriction of processing** (Article 18 of the GDPR)

You have the right to request the restriction of processing where the grounds determined in Article 18 of the GDPR apply.

(f) **Data portability** (Article 20 of the GDPR)

You have the right to receive your personal data provided to IBIDEN, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from IBIDEN, if the processing is based on consent [point (a) of Article 6(1) or point (a) of Article 9(2)] or is conducted for the performance of the contract [point (b) of Article 6(1)], and the processing is carried out by automated means. In exercising your right to data portability, You have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

(g) **Objection** (Article 21 of the GDPR)

If the data processing is based on the legitimate interest of IBIDEN: You have the right at any time to object (on grounds relating to your particular situation) against processing of Your personal data based on legitimate interest, including also profiling. IBIDEN shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing, which override Your interests, rights and freedoms or if the data processing is necessary for the establishment, exercise or defence of legal claims.

3. **Legal remedy**

If You deem, that Your personal data is processed unlawfully and/or any of Your data privacy rights have been violated You are entitled for the following legal remedies:

- (a) You have the right to contact IBIDEN, as the data controller and via the contact details in section 1 of this Privacy Notice.
- (b) You have the right to turn directly to the national supervisory authority with Your complaint having jurisdiction in the case directly. Please see below the contact information of the national supervisory authorities.

Country	Authority	Contact
The Netherlands	Autoriteit Persoonsgegevens	address: Bezuidenhoutseweg 30, 2594 AV Den Haag, postal address: Autoriteit Persoonsgegevens, Postbus 93374, 2509 AJ Den Haag, Nederland. https://autoriteitpersoonsgegevens.nl
Germany	Landesbeauftragter für Datenschutz und Informationsfreiheit, Baden-Württemberg	address: Königstraße 10a, 70173, Stuttgart, Germany https://www.baden-wuerttemberg.datenschutz.de
France	Commission Nationale de l'Informatique et des Libertés (CNIL)	address: 3 place de Fontenoy TSA 80715, Paris cedex 07, France https://www.cnil.fr
Italy	Garante per la protezione dei dati personali	address: Piazza Venezia 11, 00187 Roma, Italy https://www.garanteprivacy.it/web/guest/home
United Kingdom	Information Commissioner's Office	address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF https://ico.org.uk/

- (c) File a claim against IBIDEN, as data controller at the court.

You are entitled to file a claim at your local court having jurisdiction in the case, against IBIDEN, if you deem that Your personal data is processed unlawfully and/or any of Your data privacy rights have been violated.

4. Characteristics of the data processing activity

GENERAL CHARACTERISTICS OF THE PROCESSING ACTIVITY	
Title of data processing:	External and internal recruitment (with an external recruitment service provider)
Description of the purpose of processing:	The processing of the personal data of job applicants is conducted for the purpose of carrying out the evaluation of the job applicants for the sake of selecting one applicant to a given position. IBIDEN collects the personal data of job applicants either from within the company (internal recruitment), or by an external recruitment service provider (external recruitment) who act as data processors on behalf of IBIDEN.
Joint data controller:	Ibiden Co., Ltd.
Categories of personal data processed:	Personal data provided by the applicant in their application/CVs, contact information, personal data publicly available (e.g. LinkedIn, Facebook, personal

	webpage), internal assessment of the applicant based on the provided and public information
Legal basis for the processing:	The consent of the data subject – in accordance with Article 6 (1) a of the GDPR
Retention time:	A maximum of four (4) weeks after the end of application process
Data subject:	Persons applying for specific positions at IBIDEN; In case of recommendation, the recommending persons used as reference
Source of personal data:	Directly from the data subject in case of internal recruitment; service provider in case of external recruitment
Possible consequences of failure to provide such data:	The job application of the data subject cannot be processed/evaluated.
ACCESS TO THE PERSONAL DATA	
Persons (by positions) having access to the personal data:	Managing director and the dedicated HR-personnel
TRANSFER OF PERSONAL DATA	
Name of recipients	Ibiden Co., Ltd.
Role of recipient: (Controller/ Joint controller/ Data Processor/ Other)	Joint controller
Purpose of data transfer:	Depending on the case it is possible that the company employs someone for performing specific tasks for the parent company (Ibiden Co., Ltd.) in Europe. Limited to such cases, the final decision about recruitment is done by personnel of Ibiden Co., Ltd.
Data transfer to a third country:	Japan
Appropriate safeguards applied for the data transfer:	Appropriate joint controller agreement is in place between IBIDEN Europe B.V. and Ibiden Co., Ltd.
DATA PRIVACY RIGHTS <i>(The description of certain rights and the way they might be exercised is described in the General Employee Data Privacy Notice of IBIDEN EURPE B.V. Abbreviations: “Y”=yes / “N”=no / “Cond.” =according to the conditions of the GDPR)</i>	
Withdrawal of consent:	Y
Access:	Y
Rectification:	Y

Erasure:	Cond.
Restriction of processing:	Cond.
Data portability:	N
Objection:	Cond.
Exemption from being a subject to a decision based solely on automated processing:	N
Complaint (with the controller):	Y
Complaint (with the supervisory authority):	Y
Filing a claim (before court):	Y
OTHER CHARACTERISTICS	
Other relevant information on the processing activity:	In accordance with applicable regulations, personal data of those applicants to IBIDEN's Stuttgart Branch, who were invited to an interview, will be stored for six (6) months.

5. Version information

This Privacy Notice was published on September 30th, 2019. The current text of the Privacy Notice is the 1st edition.