

## Data Privacy Statement for Application Platform

Thank you for your interest in a position within the Boehringer Ingelheim Group. We would like to inform you about how we process and protect your personal data.

The operator of the application platform is Boehringer Ingelheim GmbH, Binger Strasse 173, 55216 Ingelheim am Rhein, Germany.

Please note that, depending on the location as well as the respective Boehringer Ingelheim company to which you are applying, additional laws or provisions may apply (e.g. for companies based in the European Economic Area, China or the USA). You will find a description of these special provisions in section VIII.

### I. How and why do we use your personal data?

#### 1. Selection and recruitment process

We will use your personal data to:

- process your application
- assess your suitability for the position to be filled
- carry out administrative tasks relating to your potential hiring, such as scheduling appointments.

We mainly use the personal data you provide on our application platform. We may also use some personal data from public sources (e.g. LinkedIn) or from references you provided. If you are an employee of Boehringer Ingelheim, personnel responsible may also use existing data from our HR systems (e.g. your talent card), but only on a need to know basis.

The legal basis is the need to process your application (pre-contractual relationship). If you do not provide the personal data marked as "required" we will not be able to process your application.

#### 2. Talent pools

If you choose to join our talent pools, we will use the personal data from your candidate profile to identify relevant job offers that align with your interests, focusing on details such as your educational background, work history, skills, and competencies. This will enable us to stay in touch with you and to notify you of other interesting positions.

When creating your profile, you can choose to make your profile either visible:

- a.) By all recruiters at Boehringer Ingelheim to also consider me for other matching positions and talent pools for additional career opportunities.*

Picking this option makes your profile visible for all recruiters and allows us to also consider you for other matching positions and talent pools for additional career opportunities.

- b.) Only by recruiters that are responsible for requisitions I applied to. Therefore, I neither wish to be considered for other matching positions nor for talent pools*

When picking this option access to your requisition will be restricted only to recruiters, HR and managers that are directly involved in the position(s) you applied to. You will neither be considered for other matching positions nor for talent pools.

You can change this choice on the application platform at any time by clicking on “Options” → “My Profile” → “Search Options and Privacy”.

The legal basis for the inclusion into talent pools is your consent.

### **3. Statistics**

We may use your personal data to prepare statistics. These serve to evaluate and improve our recruitment and HR processes. The statistics only contain aggregated and anonymized information.

In some countries personal data will be requested for the purpose of diversity monitoring. This may include gender (identity), year of birth and your nationality. Answering these questions is voluntary. If you choose not to answer these questions this will not prevent or hinder the submission of your application or your participation in the selection process. Any personal data entered in these three questions, where applicable, is used solely for statistical and reporting purposes to enable us to monitor the effects of our diversity and inclusion efforts. These individual answers will not be visible to the hiring manager or recruiter but will be used in an anonymized and aggregated form to prepare and analyse statistics.

The legal basis is our legitimate interest in improving our recruitment and HR processes and monitoring the effects of our diversity and inclusion efforts.

### **4. Website of the application platform & log data**

When you visit the website, some data is temporarily stored (i.e. IP address and browser metadata). The temporary storage of this data is necessary to deliver the website to you. The legal basis is the need to process your application (pre-contractual relationship).

Further storage of this data takes place in log files in order to ensure the functionality of our website and, if necessary, to enforce our rights or property, our terms of use and the rights of third parties. The legal basis is our legitimate interest in securing the security of our website and enforcing our rights.

## **II. Who has access to your personal data?**

### **1. Boehringer Ingelheim Group**

Due to the corporate structure of Boehringer Ingelheim, various companies within the group may potentially be involved in processing your personal data:

- The company to which you have applied for the position
- Other Boehringer companies whose relevant departments or HR units are involved in the processing of your application
- Boehringer Ingelheim GmbH as the operator of this application platform

*Example: you apply for a position with Boehringer Ingelheim Ltd. (United Kingdom). Employees from the relevant department in the USA (Boehringer Ingelheim Pharmaceuticals, Inc.) and the HR department in Germany (Boehringer Ingelheim Pharma GmbH & Co. KG) are involved in the processing of your application. Consequently, employees from all three companies receive and process your personal data.*

For managing the onboarding process if you are hired, your data will be transferred from the application platform to the personnel management and other IT systems of the Boehringer Ingelheim Group.

## 2. Service providers

We engage service providers to process your personal data for the purposes described in this data protection information. These service providers process the data only on our behalf, in accordance with our instructions and under our control.

One of these service providers is SAP Deutschland SE & Co. KG Hasso-Plattner-Ring 7 69190 Walldorf, Germany] providing the Success Factors application and maintenance services.

## 3. Other third parties

Your data may be passed on to third-party companies for the purpose of carrying out assessments, tests, background checks and other activities in connection with the selection and validation of candidates and application documents.

Furthermore, we transmit personal data to third parties if this is required by law, necessary for the exercise and defense of legal claims or if third parties provide certain services for us (e.g., lawyers, tax consultants).

## III. When is my personal data deleted?

The profile on the application platform is deleted automatically after:

**Australia and New Zealand:** 12 months of inactivity in the application system

**European Economic Area/European Union:** 12 months of inactivity in the application system

**Indonesia:** 3 months of inactivity in the application system

**Austria:** 7 months of inactivity in the application system

**All other countries:** 36 months of inactivity in the application system

Employees of Boehringer Ingelheim applying within the Boehringer Ingelheim Group may be subject to different local operating rules depending on the country and company which they apply to.

Unless a specific storage period is specified in this Privacy Statement, we will only process your data as long as this is necessary for the respective purposes or as long as there are legal retention obligations. After the respective processing purpose ceases to apply and retention obligations end, your data will be routinely deleted.

You can request deletion of your profile at any time on the application platform by clicking on "Options" → "Settings" → "Delete profile".

## IV. How is your data protected?

The security of your personal data is important to us. For this reason, the information you share with us is kept confidential. We take appropriate precautions to protect personal data against loss, misuse, unauthorized access, disclosure, modification, and destruction.

## V. What cookies are used?

We use cookies (small text files that are stored in your browser) and may also use similar technologies such as web storage or web beacons (hereinafter referred to as "cookies").

## **1. Necessary cookies**

Necessary cookies are required in order for the website to function properly. They provide basic functions such as site navigation, access to secure areas of the website or the language settings. We store these necessary cookies for up to 12 months.

## **2 Cookies that require your consent**

### **2.1 Website optimisation**

If you agree to the “Optimisation” section in our cookie banner, we will place cookies that will make navigating our website more convenient for you, for example by storing your search requests or enabling you to share job openings on social media. These cookies are stored for up to three months.

We work with the following partners:

#### **Adobe Analytics (Omniure)**

If and for as long as you agree, we will use cookies from Adobe Analytics, a web analysis service provided by Adobe Systems Software Ireland Limited (“Adobe”). Adobe Analytics uses cookies on behalf of Boehringer Ingelheim in order to analyse the entire data traffic and user behaviour. The lifespan of the cookies ranges from the current session up to three years. The IP address collected by the cookies is shortened prior to geolocation. It is then replaced by a generic IP address. Adobe will not link your IP address to other information from Adobe. You can prevent Adobe from collecting and using information (cookies and IP address) by making use of your options under <http://www.adobe.com/privacy/opt-out.html> (link is external) or changing your settings here. The analyses help us to improve our services.

The cookies associated with this service allow us to do the following:

- create a unique ID for users and track users beyond our various domains,
- determine whether cookies are activated,
- record statistics regarding the user’s visits to the website,
- determine the time (in days) between two visits from the same visitor,
- determine the number of visits of an individual user.

### **2.2 Marketing cookies**

With your consent, we will use marketing cookies that provide you with a more convenient user experience of our website and allow our partners (see below) to follow users to other websites in order to show advertisements that are relevant and appealing to the individual user.

We work with the following partners:

#### **LinkedIn (Insight-Tag)**


If you consent, we activate a LinkedIn Cookie when you visit our website (LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2, Ireland).

The tag reports to LinkedIn what actions you have taken on our site as well as data by which you may be identified.

With the data LinkedIn can see that you have visited our website, what you have clicked on and if you clicked on a link on LinkedIn that connects you to our website. This allows LinkedIn to show you interest-based content. LinkedIn can link this data to your user account and use it for its own purposes. For information how LinkedIn processes your data please check <https://www.linkedin.com/legal/privacy-policy>.

We do not receive any data about you or other LinkedIn users, but only statistics that show us, aggregated for all users for a certain time period, how they used our offers and ads on other platforms of LinkedIn. This helps us to determine which of our ads were successful and which ones were not.

### 3 Withdrawing your consent

Your cookie preferences will be stored in your browser's local storage. This includes cookies necessary for the website's operation. Additionally, you can freely decide and change any time whether you accept cookies or choose to opt out of cookies. Please choose "Select Cookie Preferences" or  on the website to adapt your settings.

Select Cookie Preferences

## VI. How can I access my personal data and what are my rights?

At any time, you can view, edit or delete the data that you uploaded as well as your applicant profile. Please note that any changes made to your profile may have an impact on your current applications. You can also withdraw your application at any time. Changes to or deactivations of your applicant profile may possibly have an impact on your pending applications.

You have the right to access the personal data stored about you and to receive the data you provided in a common and machine-readable format or have such data transferred to a third party. In justified cases, you can request the deletion, correction or limitation of processing of your data. Furthermore, you can revoke your consent at any time with effect for the future.

### Right to object

To the extent we base the processing on our legitimate interests, you may opt-out from such processing at any time. In this case, we will not process such personal data any longer unless our interests prevail.

## VII. Who can I contact with questions about data processing?

To exercise these rights or if you have concerns regarding the processing of your data, please contact our data protection officer at [datenschutz@boehringer-ingelheim.com](mailto:datenschutz@boehringer-ingelheim.com), stating your name, Email address and country of application you used in your application.

If you have any further concerns regarding the processing of your data, you can also contact your relevant data protection authority. Boehringer Ingelheim International GmbH is under the jurisdiction of the Rhineland Palatinate Commissioner for Data Protection and Freedom of Information ([poststelle@datenschutz.rlp.de](mailto:poststelle@datenschutz.rlp.de)).

## **VIII. National data protection notices**

Please note that the respective data protection directives of the country in which the position you are applying to is based will apply. If, for instance, your domicile is located within the European Economic Area and you are applying to a company that is based outside of the Economic Area (e.g. in China or the USA), the use of your data by these companies will not be subject to the European data protection directives and, therefore, a different level of protection will apply.

Below, you will find information regarding additional data protection requirements in relation to the location of the respective Boehringer Ingelheim company:

- Notice for applications in Argentina
- Notice for applications in Australia and New Zealand
- Notice for applications in Brazil
- Notice for applications in Canada
- Notice for applications in China
- Notice for applications in Colombia
- Notice for applications in the European Economic Area
- Notice for applications in Indonesia
- Notice for applications in Korea
- Notice for applications in Mexico
- Notice for applications in the Philippines
- Notice for applications in the Russian Federation
- Notice for applications in Turkey
- Notice for applications in the Ukraine
- Notice for applications in the USA
- Notice for applications in the South America Region (Argentina, Bolivia, Chile, Colombia, Ecuador, Paraguay, Perú, Uruguay and Venezuela)
- Notice for applications in Israel
- Notice for applications in Kazakhstan
- Notice for applications in Austria
- Notice for applications in Vietnam

### **1. Notice for Applications in Argentina**

“The Data Protection Agency (Agencia de Acceso a la Información Pública), Supervisory Agency of Law N° 25.326, is entitled to receive claims and complaints filed for violation of personal data protection regulations.”

### **2. Notice for applications in Australia and New Zealand**

If you are applying for a position at a company based in Australia or New Zealand, the following additionally applies:

Where possible we collect your personal information directly from you. We may also collect personal information from third parties (where it is unreasonable or impractical to collect personal information from you directly or where you have authorised collection from such third parties) or from publicly available resources. If you do not supply us with the desired personal information, we potentially may not be able to fully and effectively process your application.

Subject to applicable privacy laws, if your personal information is no longer needed for any purpose for which it was collected or for which it may be lawfully used, we will either destroy it or permanently anonymise it.

The entities described above under "II. Who has access to your personal data?" include all of our affiliated legal entities as well as service providers. Some of our affiliated legal entities and service providers may be based overseas and so, in disclosing your personal information to these parties, your personal information may be transferred and stored overseas. We ensure that any organisations we disclose your personal information to, whether local or overseas, safeguard and protect your personal information and comply with applicable privacy laws.

Our data protection directive contains information on how you can file a complaint regarding a violation of your right to data protection and how we handle your complaint. You can send your questions on data protection, make a complaint, or access or update the personal information we hold about you by writing to our data protection officer at [privacyofficer.syd@boehringer-ingelheim.com](mailto:privacyofficer.syd@boehringer-ingelheim.com).

If you are not satisfied with the way in which we handle your question, request or complaint, you can contact:

- If you are located in Australia: the Office of the Australian Information Commissioner on 1300 363 992, email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au), or submit an online complaint form accessed at [www.oaic.gov.au/privacy/privacy-complaints/](http://www.oaic.gov.au/privacy/privacy-complaints/).
- If you are located in New Zealand: the Office of the Privacy Commissioner on 0800 803 909, email [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz), or submit an online complaint form accessed at [www.privacy.org.nz/your-rights/making-a-complaint/](http://www.privacy.org.nz/your-rights/making-a-complaint/).

**Storage period:** personal or personally identifying data for applications in Australia and New Zealand is deleted after 12 months of inactivity in the application system.

### **3. Notice for applications in Brazil**

If you are applying for a position at a company based in Brazil or if you are in Brazil at the moment of collection of your personal data, the following applies:

Please note that the respective data protection directives in Brazil (LGPD – Law number 13709/2018) are applicable and, by submitting an application through this website, the applicant (data subject) acknowledges and accepts that the data in his/her curriculum and other personal data such as name, address, telephone number, gender, date of birth, email address, among others capable of identifying the data subject, will be electronically collected and processed for the purposes specified in this Term.

The data subject also understands and acknowledges that any sensitive personal data relating to ethnic and racial origin, relating to health or any other, may be processed for the purposes specified in this Term, provided that specific and prominent consent is given. Failure to provide consent for the collection of sensitive personal data will not prevent or hinder the submission of the application by the data subject and his/her participation in the selection process.

Boehringer Ingelheim do Brasil Química e Farmacêutica Ltda. will be the controller of the personal data.

If you have any doubts about the processing of your personal data, if you wish to revoke your consent or if you prefer to exercise any of the data subject's rights provided for in the LGPD and in this Data Privacy Term, please contact us informing your name and the e-mail

address used in the application through the electronic address DPOBrasil.BR@boehringer-ingelheim.com.

Use of data by companies headquartered outside Brazil: if you apply for a position in a company headquartered outside Brazil and your data is also processed by a Group company outside Brazil, we will ensure an adequate level of security for the your data through the application of robust contractual clauses.

#### **4. Notice for applications in Canada**

If you are applying for a position based in Canada, the following additionally applies:

We collect your name and contact information directly from you as part of the application process. If you do not supply us with your name and the desired contact information, we potentially may not be able to fully and effectively process your application for employment.

The entities described above under "II. Who has access to your personal data?" include all of our affiliated legal entities as well as service providers. Some of our affiliated legal entities and service providers may be based overseas and so, in disclosing your name and contact information to these parties, your information may be transferred and stored overseas. We ensure that any organizations we disclose your name and contact information to, whether local or overseas, safeguard and protect the information you have provided with your application, and that they comply with applicable privacy legislation.

#### **5. Notice for applications in China**

If you are applying for a position based in China, the following additionally applies:

If you apply for a position in one of Boehringer Ingelheim Group's subsidiaries located in China (only for the purpose of this notice, excluding Hong Kong, Macau and Taiwan), then in addition to the Information on Data Protection regarding the Application Platform mentioned above, this Notice for Applications in China shall also be applicable; in case of any conflicts, this Notice for Applications in China shall prevail.

##### Collection and Use of Personal Data

If we obtain your consent, or it is necessary for the execution or performance of an employment agreement, or it is necessary to fulfill relevant statutory obligations, we will collect, use, provide or otherwise process your personal data. We will store your personal data for as long as is reasonably necessary for the purposes set out below.

When creating an applicant account, you will be required to provide your customized user name and password to be set so as to complete the registration and maintain the security of your account. When applying for a position, you will be required to provide your name, telephone number, email address and city of residence. In addition, you may choose to provide your profile and other personal data, as indicated on the application page. We collect and use such personal data to learn about your basic information, assess your qualification for the corresponding position, contact you to arrange subsequent interview and recruitment (if any). If you agree to become part of the worldwide Boehringer Ingelheim applicant pool, we will continue to store the above personal data so as to recommend qualified job opportunities for you in the future. For details on the collection and use of log data and cookies, please refer to section V of the Information on Data Protection Regarding the Application Platform.

##### Collection and Provision of Personal Data



Boehringer Ingelheim is a multinational group company, and the headquarters of Boehringer Ingelheim (located in Germany) operates this application platform and coordinates global HR management and recruitment activities. Therefore, your personal data will be stored and processed overseas. Please note that, if you do not agree your personal data to be transferred abroad, please do not click on “I Accept” on the previous page and do not provide any of your personal data to us.

As the position you are applying for is in China, Boehringer Ingelheim Group’s subsidiaries located in China (including Boehringer Ingelheim (China) Investment Co., Ltd. and its affiliates (together referred to as the “Boehringer Ingelheim China”), and the foreign affiliates in charge of recruitment, will access, use, receive, store or otherwise process the above personal data for the purpose of conducting the recruitment together with the Boehringer Ingelheim headquarters. In addition, the service providers for background investigation, questionnaire test and technical operation and maintenance engaged by Boehringer Ingelheim China or Boehringer Ingelheim headquarters may access your personal data to the extent necessary in order to provide corresponding services. Such service providers may also process your personal data abroad. You may contact us to find further information on such service providers.

We attach great importance to the security of your personal data and take reasonable and practicable security measures in compliance with PRC laws and industry standards to protect your personal data.

#### Rights Related to Personal Data and Exercise thereof

You are entitled to know, make decisions on, review, copy, correct, supplement, transfer and delete your personal data in accordance with applicable laws. If you would like to exercise your rights or have any questions concerning our rules on processing of personal data, you may contact Boehringer Ingelheim headquarters (contact information is specified in section III of the Information on Data Protection Regarding the Application Platform) or Boehringer Ingelheim China (HRTalent.CN@boehringer-ingelheim.com). In addition, you may also check and modify your personal data on “My Account” on this application platform.

## **6. Notice for applications in Colombia**

By submitting the application through this website, I declare, acknowledge and accept that in accordance with Law 1581 of 2012 and other applicable laws or regulations, I have been duly informed by Boehringer Ingelheim S.A. Colombia (hereinafter “BI”) that the curriculum vitae data and other personal data such as name, address and contact telephone number, gender, date of birth, among others; they will be included in a database, formed by electronic means and will be treated according to the finalities contained herein. Understanding that these may involve sensitive personal data such as those that reveal my racial or ethnic origin, or any other, and I understand that I am in no way obligated to authorize their treatment. The Data Processing will have the same finalities contained in the accepted general privacy text.

I have also been duly informed by BI that I will be able to access my existing personal information in the BI database, as well as request, if applicable, the rectification or update of my data and that I may request, at any moment, the delete of my personal data from BI databases, and / or its affiliates, in whole or in part. I may also choose to revoke, at any time, my consent to the processing of my personal data. For the purposes set forth in this paragraph, I must submit my request in writing to BI. For this you can contact the email: Legales.CO@boehringer-ingelheim.com or phone number: (+57) (1) 3199100.

## 7. Notice for applications in the European Economic Area

If you are applying for a position at a company based within the European Economic Area, the following additionally applies:

**Data usage by companies based outside of the European Economic Area:** if you are applying for a position with a company that is based within the European Economic Area (such as Germany) and your data is also processed by a Group company that is based in a country outside of the European Economic Area (such as a company based in the USA) for which there is no applicable appropriateness resolution from the European Commission, we will ensure an appropriate level of safety for your data with the use of standard contractual clauses that are provided by the European Commission. You can request a copy of the contract ensuring the adequate level of data protection from our data protection officer listed in the contact information below.

### **Legal basis:**

The respective GDPR articles for the legal bases given above are:

- Consent: Art. 6 (1) a) GDPR.
- Need to process your application (pre-contractual relationship): Necessity for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract according to Art. 6(1) b) GDPR.
- Necessity for compliance with a legal obligation to which the controller is subject: Art. 6 (1) c) GDPR.
- Necessity for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject: Art. 6 (1) f) GDPR.

**Sensitive data: please do not store sensitive data on the application platform.** This especially applies to data regarding your health, your religion, your membership in a union or political party, your sexual life, your prior convictions, or your addictions. This does not apply to specifically asked questions during the application process, where voluntary information on sensitive data, e.g. about disabilities, is requested. The legal basis for such voluntary storage is your explicit consent (Art. 9 (2) a) GDPR).

**Joint Controllership:** If you are applying at a Boehringer Ingelheim company established in the EU, Boehringer Ingelheim GmbH and that Boehringer company are joint controllers under Art. 26 GDPR and therefore jointly responsible for processing your personal data on this platform. As the platform is primarily provided by Boehringer Ingelheim GmbH, Boehringer Ingelheim GmbH is primarily responsible for compliance with GDPR. Therefore, please contact Boehringer Ingelheim GmbH as designated point of contact if you want to exercise your data protection rights or have any questions or concerns; of course, you are also free to contact the Boehringer Ingelheim company you are applying to for a position, instead.

## 8. Notice for applications in Indonesia

**Storage period:** personal or personally identifying data for applications in Indonesia is deleted after 3 (three) months of inactivity in the application system.

## **9. Notice for applications in Korea**

If you are applying for a position at a company based in the Republic of Korea, the following also applies:

We process all the data listed in your application and your applicant profile, which includes: your name, your gender, your date of birth, your nationality, your academic career, and any other information that you have voluntarily provided us with for the purposes listed in section 1 (whereby, however, sensitive data and data that enables unmistakable personal identification, in accordance with the Korean law regarding the protection of personal data ("*Personal Information Protection Act, PIPA*"), are under no circumstances processed without obtaining your express declaration of consent for the specific instance of the processing of such data) and communicate this information to the entities listed in section 2 for the same purposes.

Subject to another provision in accordance with respective applicable law, your applicant profile, your application, and your personal data are stored, used, and made available until the aforementioned purposes of the Boehringer Ingelheim Group have been fulfilled. You are hereby informed of the fact that you are entitled to refuse to provide the following declaration; however, in the event of such a refusal to provide a declaration of consent, you will not have the ability to apply for hiring procedures within group companies belonging to Boehringer Ingelheim through this application platform.

## **10. Notice for applications in Mexico**

PROMECO S.A. DE C.V. ("Promeco"), whose address is Maíz 49, Barrio Xaltocan, Xochimilco, C.P.16090, Mexico City, Mexico, and Anchor S.A. de C.V. ("Anchor"), whose address is Calle 30 No. 2614, Zona Industrial Calle 5 y Calle 7, C.P.44940, Guadalajara, Jalisco, Mexico, both belonging to the Boehringer Ingelheim group of companies, shall be responsible for handling your personal data and/or sensitive personal data, in accordance with the Federal Protection of Personal Data in the Possession of Individuals Act and its Regulations (the "Act").

This privacy notice covers sensitive personal data, which are data that may affect owners very personally, or the use of which may result in discrimination or create a serious risk for owners. In particular, sensitive data include those such as racial or ethnic origin, health (now and in the future), racial or ethnic origin (sic) genetic information, religious, philosophical and moral beliefs, membership of unions, political opinions or sexual preference.

Your personal data and/or sensitive personal data will be compiled, used, stored and, if applicable, transferred as established in the Act and herein.

Data compiled and purpose of handling personal data and/or sensitive personal data

The personal and/or sensitive personal data that Promeco and/or Anchor shall compile and handle may include:

- Full name
- Nationality
- Address (street, number, precinct, state, zip code)
- Telephone and/or cell phone number
- E-mail address
- Date of birth
- Marital status
- Tax number (RFC)

- Citizen's number (CURP)
- Professional license
- School record
- Current salary and fixed and variable benefits
- Employment record, including details of your current job and previous jobs
- Your health past and/or present
- Your goals, interests, skills and professional experience

Promeco and/or Anchor may only handle your sensitive personal data if you sign the privacy notice.

Your personal data and/or sensitive personal data may be used for: staff selection and recruitment; (ii) preparing and analyzing internal human resources statistics; (iii) checking the salary proposal submitted to successful candidates who will be employees of Promeco and/or Anchor; (iv) carrying out assessments to identify the skills for the position in question; (v) meeting the requirements established in local and international social security and health and safety regulations; (vi) carrying out medical checkups on new employees, indispensable in accordance with the aforementioned regulations; (vii) carrying out psychometric studies, and (viii) contacting owners during the selection process.

Security measures when handling personal and/or sensitive personal data

As Promeco and/or Anchor are responsible for the handling of your personal data and/or sensitive personal data, they shall observe the principles of lawfulness, consent, information, quality, purpose, loyalty, proportionality and responsibility established in the Act. Promeco and/or Anchor shall also meet all administrative, technical and physical security measures to protect personal data and/or sensitive personal against damage, loss, alteration, destruction or the unauthorized use, access or handling of said personal data and/or sensitive personal data.

Transferring personal data and/or sensitive personal data

Promeco y/o Anchor may share some or all of your personal data and/or sensitive personal data with the related companies of Promeco and/or Anchor, professional external advisors and/or other service providers who act as data controllers for and on behalf of Promeco and/or Anchor when necessary to meet the purpose established herein.

Promeco and/or Anchor shall ensure that said data controllers have suitable administrative, technical and physical security measures in place to safeguard your personal data and/or sensitive personal data, and that data controllers use your personal data and/or sensitive personal data solely and exclusively for the purpose for which they are provided and in accordance with the privacy notice and the Act.

Your personal data and/or sensitive personal may be transferred outside of Mexico for handling, by Promeco and/or Anchor and its related companies, or third parties acting on their behalf, and solely for the purposes established herein.

Promeco and/or Anchor may transfer your personal data and/or sensitive personal data to third parties under the circumstances established in the Act.

Means to restrict the use or disclosure of your personal data and/or sensitive personal data

You may restrict the use or disclosure of your personal data and/or sensitive personal data by submitting a request to exercise your ARCO rights, cancel your consent or refuse to allow your personal data to be used for the secondary purposes referred to later on in this document. As soon as we receive your request, we will enter it on our list to make sure that your personal data and/or sensitive personal data are not disclosed and used.

## How to exercise ARCO rights

Owners may ask Promeco and/or Anchor to cancel and restrict their consent at any time and to access, rectify, cancel or oppose the handling of their personal data and/or sensitive personal data ("ARCO rights"), by sending their request to the following e-mail address: [datospersonales.mex@boehringer-ingelheim.com](mailto:datospersonales.mex@boehringer-ingelheim.com).

Requests to exercise ARCO rights must be submitted with the following:

Name, address and contact details of the owner, for replying to requests.

Identity documents of owners, or those of their legal representative.

A clear and accurate description of the personal data and/or sensitive personal data for which ARCO rights are to be exercised

Any other information or document that makes it easier to locate the personal data and/or sensitive personal data of owners.

Replies to requests for exercising ARCO rights will be given in twenty (20) business days as from when requests are received, duly completed.

This period may be extended once only, for the same length of time, provided that the circumstances so justify.

If any of the personal data and/or sensitive personal data of owners are inaccurate or incomplete, they must state the changes to be made and provide all supporting documents to back their requests, in addition to the information referred to above.

Promeco and/or Anchor shall not be required to cancel personal data and/or sensitive personal data under any of the circumstances established in Article 26 of the Act.

## Changes to the Notice of Privacy

Promeco and/or Anchor may change or update the privacy notice at any time, to comply with the Act or any other applicable law, so in this case, Promeco and/or Anchor shall advise you accordingly. Changes to the privacy notice may be consulted at

[https://content.boehringer-ingelheim.com/DAM/6cbd5b90-bd8a-4d72-b644-b014006a76f4/successfactors\\_recruiting\\_global\\_data\\_privacy\\_statement\\_en.pdf](https://content.boehringer-ingelheim.com/DAM/6cbd5b90-bd8a-4d72-b644-b014006a76f4/successfactors_recruiting_global_data_privacy_statement_en.pdf)

## 11. Notice for Applications in Philippines

If you are applying for a position at a company based in the Philippines, the following applies: We process all the data listed in your application and your applicant profile, which includes: your name, your gender, your date of birth, your nationality, your academic career, and any other information that you have voluntarily provided us with for the purposes listed in section 1 (whereby, however, sensitive data and data that enables unmistakable personal identification, in accordance with the Data Privacy Act of 2012, are under no circumstances processed without obtaining your express declaration of consent for the specific instance of the processing of such data) and communicate this information to the entities listed in section 2 for the same purposes.

Subject to another provision in accordance with respective applicable law, your applicant profile, your application, and your personal data are stored, used, and made available until the aforementioned purposes of the Boehringer Ingelheim Group have been fulfilled. You are hereby informed of the fact that you are entitled to refuse to provide the following declaration; however, in the event of such a refusal to provide a declaration of consent, you will not have

the ability to apply for hiring procedures within group companies belonging to Boehringer Ingelheim through this application platform.

In accordance with the Data Privacy Act of 2012, its Implementing Rules and Regulations, and other issuances of the National Privacy Commission, you as data subject have the following rights:

- Right to be informed – you have the right to be informed whether your personal data is being, or have been processed, including the existence of automated decision-making and profiling.
- Right to object - you have the right to object to the processing of your personal data, including processing for direct marketing, automated processing or profiling.
- Right to access – you have the right to reasonable access, upon written request, the contents of your personal data that were processed and the manner by which these were processed; the sources from which these were obtained; the recipients and reasons for disclosure, if any; date when your information was last modified; and information on automated processes where your information will be made as the sole basis for any decision that may significantly affect you.
- Right to rectify erroneous data – you have the right to correct any error in the personal data and if warranted, request immediate rectification.
- Right to erase or block – you have, based on reasonable grounds, the right to suspend, withdraw or order the blocking, removal or destruction of your personal data from to Boehringer Ingelheim's filing system, without prejudice to BIPHI's continuing to process personal data for commercial, operational, legal and regulatory purposes.
- Right to secure data portability - where personal data is processed by electronic means and in a structured and commonly used format, you have the right to obtain from Boehringer Ingelheim a copy of such data in an electronic or structured format that is commonly used and allows your further use.
- Right to be indemnified for damages – you shall be indemnified for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal data, taking into account any violation of your rights and freedoms as data subject
- Right to file a complaint - may file a complaint or exercise your rights above by reaching out to us through the contact details provided below. You may also raise privacy concerns to the National Privacy Commission through their website at [www.privacy.gov.ph](http://www.privacy.gov.ph).

If you have any questions about this privacy notice and our data processing activities or you wish to update any personal information you have shared with us, you may contact our Data Protection Officer by sending us an email at [DPOBIBSPI.PH@boehringer-ingelheim.com](mailto:DPOBIBSPI.PH@boehringer-ingelheim.com) or please write us with the following address: Boehringer Ingelheim Business Services Philippines, Inc., Unit A&B, 12th Floor, Aeon Centre, Alabang-Zapote Road corner North Bridgeway, Filinvest Corporate City, Alabang, Muntinlupa City, Philippines. Also, for further knowledge and reference about your rights as data subjects and how can you exercise them, you may visit NPC's official website at <https://privacy.gov.ph/>

## **12. Notice for the Russian Federation citizens**

If you are a citizen of the Russian Federation, you hereby provide a voluntary, specific, deliberate, and informed declaration of consent that is within your power and intended for your own benefit for the processing of your personal data, which you have transferred to the Boehringer Ingelheim Group and its technical service providers. In particular, you transfer for processing by the aforementioned entities all your personal data indicated on this application platform, especially but not limited to: last name, first name, patronymic, date of birth, information on training and qualification, information on previous employment and professional experience, contact data (domicile address, telephone number, e-mail), information on scientific works and publications, photo. Your personal data can be processed in one of the following ways: editing of personal data, including an action (procedure) or a

series of actions (transactions) that are carried out with or without the utilization of automation technology with personal data, which includes the collection, the recording, the systematization, the accumulation, the storage, the further development (updating, modification), the acquisition, the use, the transfer (communication, granting of access), the cross-border transfer to Austria or Germany, the sale, the depersonalization, the blocking, the deletion, and the destruction of personal data. We store your personal data from the point in time you send it until the withdrawal of this declaration of consent and/or the point in time as of which the purpose of the processing is achieved (if this happens to occur earlier). If you release your profile for the application tool, the deadline for the processing of your personal data is two years from the last update of your profile.

### **13. Notice for applications in Turkey**

If you are applying for a position at a company based in Turkey, the following also applies:

#### **BOEHRINGER INGELHEIM İLAÇ TİCARET ANONİM ŞİRKETİ**

##### **Employee Candidate Clarification Text**

In accordance with the Law on Protection of Personal Data No. 6698 ("Law") and the relevant secondary legislation, this Clarification Text has been prepared for the purpose of informing the employee candidates about the procedures and principles regarding the processing of their personal data when they apply for a job at **Boehringer Ingelheim İlaç Ticaret Anonim Şirketi**, which is the data controller and located at Esentepe Mah. Harman 1 Sok. Nidakule Levent N.7-9 K.15/16, İstanbul, Turkey ("Our Company").

##### **Purpose of Processing Personal Data**

**Your personal data is processed for the following purposes within the scope of the Company's human resources policies and recruitment process, within the framework of the personal data processing conditions specified in Article 5 of the Law:**

- a) **Carrying out our company's recruitment processes,**
- b) **Conducting security control processes.**

##### **To Whom Your Personal Data Can Be Transferred and For What Purposes?**

Within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the Law and for the purposes of conducting the Company's recruitment processes and evaluating your eligibility for the job, **your personal data** may be shared with **Boehringer Ingelheim İlaç Ticaret Anonim Şirketi** and our Company's Group Companies abroad, the Company's business partners and third parties from which they receive services, transferred to suppliers that provide *servers*, database and/or digital platform services *at home or abroad (including countries that do not provide adequate protection) to be maintained* on servers, databases and digital platforms located in the country or abroad, and disclosed to people you have included as a reference as part of performing reference checks.

Unless you have provided your explicit consent by accepting the **Employee Candidate Clarification Text** via opt-in tool for the transfer of your personal data abroad, in the absence of conditions which do not require the express consent in Article 9/1 of the Law (*the country to which the data will be transferred being among those that provide adequate protection or signing a contract with the party to whom the data will be transferred and obtaining permission for the transfer from the Personal Data Protection Authority*), we inform you that we cannot transfer your personal data abroad.

##### **Method and Legal Reason for Personal Data Collection**

Your personal data is collected electronically or physically, based on your job application to our Company, by e-mail during your job application and/or within the scope of the information and documents you have transmitted verbally or physically during your job interview and/or by getting information from the people you have specified in your references, pursuant to the performance of the employment contract that may be signed with our Company and the legitimate interest of our Company, in accordance with the personal data processing conditions specified in Article 5 of the Law.

We **do not require** you to submit any data in the nature of Sensitive Personal Data during your job application to and interview at our company. Sensitive Personal Data include data on race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, appearance, membership to associations, foundations or unions, health, sexual life, criminal convictions, if any, and security measures and genetic data, and we kindly request that such data not be shared with our Company during your application or interview.

### **Your Rights as the Data Subject**

You can exercise the following rights by applying to the data controller Boehringer Ingelheim İlaç Ticaret Anonim Şirketi within the scope of the Law on the Protection of Personal Data No. 6698;

- a) Learning whether personal data is processed or not,
- b) If personal data has been processed, requesting information about it,
- c) Learning the purpose of processing personal data and whether they are used in accordance with its purpose,
- d) Knowing the third parties at home or abroad to whom personal data is transferred,
- e) Requesting the rectification of the incomplete or inaccurate personal data, if any, and requesting the notification of the transaction made within this scope to third parties to whom personal data are transferred,
- f) Requesting the deletion or destruction of personal data in the event that the reasons requiring its processing disappear, and requesting the notification of the transaction made within this scope to third parties to whom personal data are transferred,
- g) Objecting to the emergence of a result against the person themselves upon analyzing the processed data exclusively through automated systems,
- h) Requesting that the damage be remedied, in case of any damage incurred due to unlawful processing of personal data.

To exercise your above-mentioned rights, you can contact [METAdataprotection.AE@boehringer-ingelheim.com](mailto:METAdataprotection.AE@boehringer-ingelheim.com) via e-mail or by any other method prescribed by the Personal Data Protection Board, together with the necessary information to identify you and your explanations about the right you wish to exercise. Your applications will be replied within a maximum of thirty (30) days as stipulated in the Law. If there is missing information or an incomprehensible matter in the information or documents submitted to us, we may contact you to eliminate the deficiencies and ambiguity to fulfill your request. Although it is essential not to charge any fees for the requests, the Company reserves the right to charge a fee based on the tariff of fees determined by the Personal Data Protection Board.

## **14. Notice for applications in Ukraine**

If you are applying for a position at a company that is based in Ukraine, the following also applies:

Data controller: the data controller responsible for your personal data is Boehringer Ingelheim RCV GmbH & Co KG, acting in Ukraine through the intermediary of Boehringer Ingelheim RCV GmbH & Co KG, with the following registered (and actual) business address: Ukraine, 04073, Kyiv, str. Stepan Bandery, 28-A.

Sensitive data (personal data for which the rights and freedoms of the data subjects are



especially compromised): please do not store sensitive data on the application platform. This especially includes information regarding your racial, ethnic, or national origin, your political opinions, your beliefs of a religious or similar nature, your membership in political parties and/or organizations, in unions, in religious communities or in non-governmental organizations with an ideological orientation, your state of health, your sexual life, your biometric data, your genetic data, any data regarding criminal offenses committed by or criminal convictions against a natural person, any data regarding restraining orders issued against a natural person, any data regarding measures taken against a natural person on the basis of the Ukrainian law on operative investigation work, any data regarding the use of violence of any kind against a natural person, and any data regarding the locations visited and/or the routes traveled by a natural person.

Data use by companies based outside of Ukraine: if you are applying for a position at a company based in Ukraine, but your data is also being processed by a group company based outside of Ukraine (such as in the USA or in Germany), we will take measures to ensure an appropriate level of protection for such personal data in accordance with the Ukrainian law regarding the protection of personal data; furthermore, we also ensure that the respective personal data is only used for the purpose for which it is collected.

Rights of the data subject: you have the following rights with regard to your personal data.

The right to know the sources of collection, the location of your personal data, the purpose of its processing, the location and/or residence (registration) of the controller or processor of this personal data, or the right to grant a corresponding power of attorney for the authorized persons to receive such information, save in the cases provided for by law;

The right to receive information regarding the conditions of access to personal data, especially information regarding third parties who receive your personal data;

The right to access your personal data;

The right to receive an answer as to whether your personal data is being processed, as well as to receive the contents of your personal data within 30 days following the receipt of the request, provided there are no legal requirements to the contrary;

The right to send a justified request to the controller in order to object to the processing of your personal data;

The right to submit a justified request in order to obtain the modification or the destruction of your personal data by a controller or processor of this personal data if this data is being processed illegally or is inaccurate;

The right to protect your personal data against illegal processing and accidental loss, destruction, damage due to intentional concealment, non-delivery or delayed delivery of this data, as well as protection against the delivery of information that is inaccurate or that damages the honor, dignity, or business reputation of a natural person;

The right to file complaints regarding the processing of your personal data with the Ukrainian Parliament Commissioner for Human Rights or with a court;

The right to implement legal protective measures in case of violation of the laws regarding the protection of personal data;

When granting a declaration of consent, the right to restrict the processing of your personal data through reservations;

The right to withdraw the consent for the processing of personal data;

The right to receive information regarding the process in the event of automatic processing of personal data;

The right to protection against automated decisions that have legal consequences for you.

#### **15. Notice for applications in the USA**

If you are applying for a position at a company based in the USA, the following applies:

In relation to section III, please note that we may store the information you have provided as well as the changes and deletions of the information as part of our usual business practices and record them for US Equal Employment Opportunity reporting purposes, even in the event of the withdrawal of your application or the editing/deletion of your profile. In the event of the deletion of your applicant profile or your application, the deletion takes place in accordance with applicable law.

#### **16. Notice for applications in the South America Region (Argentina, Bolivia, Chile, Colombia, Ecuador, Paraguay, Perú, Uruguay and Venezuela)**

**If you are applying for a position at a company based within Argentina, Bolivia, Chile, Colombia, Ecuador, Paraguay, Perú, Uruguay and Venezuela, the following additionally applies:**

You expressly authorize Boehringer to collect and process information about your personal and work background and any other relevant data about you for the purposes of evaluating your candidacy, by consulting databases, files and other means of information of public access, from companies that issue commercial reports, bases and lists of Sanctioned parties, both local and international (including from the US, EU and Japan), public information on individual or universal trials issued by the Chambers of Appeals or other Federal or Provincial courts, other records audiences and social media posts.

You declare, acknowledge, and accept that under applicable laws or regulations, you have been duly informed by Boehringer that the curriculum vitae data and other personal data such as name, address and contact telephone number, gender, date of birth, among others; they will be included in a database, formed by electronic means and will be processed according to the purposes and means contained herein. Understanding that these may involve sensitive personal data such as those that reveal your racial or ethnic origin, or any other whose improper use or disclosure might cause discrimination, and you understand that you are in no way obligated to authorize its processing. The Data Processing will have the same purposes and means contained in the accepted general privacy text.

You have also been duly informed by Boehringer that you will be able to access your existing personal information in the Boehringer database, as well as request, if applicable, the rectification or update of your data and that you may request, at any moment, the delete of your personal data from BI databases, and / or its affiliates, in whole or in part. You may also choose to revoke or withdraw, at any time, your consent to the processing of your personal data.

Country specifics:

**Argentina:**

In order to perform your access rights, please contact Boehringer through the following email: LEGprivacidadapub.AR@boehringer-ingelheim.com

The Data Protection Agency (Agencia de Acceso a la Información Pública), Supervisory Agency of Law N° 25.326, is entitled to receive claims and complaints filed for violation of personal data protection regulations.

**Chile:**

In order to perform your rights granted by Law, please contact Boehringer Ingelheim through the following email: data\_protectioncl@boehringer-ingelheim.com

**Colombia:**

In order to perform your access rights, please contact Boehringer through the following email: Legales.CO@boehringer-ingelheim.com or phone number: (+57) (1) 3199100.

**Ecuador:**

In order to perform your access rights, please contact Boehringer Ingelheim through the following email: data\_protectionec@boehringer-ingelheim.com

**Paraguay:**

In order to perform your access rights, please contact Boehringer through the following email: LEGprivacidadapub.AR@boehringer-ingelheim.com

**Perú:**

In order to perform your access rights, please contact Boehringer Ingelheim through the following email: data\_protectionpe@boehringer-ingelheim.com

**Uruguay:**

In order to perform your access rights, please contact Boehringer through the following email: LEGprivacidadapub.AR@boehringer-ingelheim.com

## **17. Notice for applications in Israel**

If you are applying for a position at a company based in Israel or if you are domiciled in Israel, the following additionally applies:

Legal obligation. You are not legally required to provide us with your personal data, and you are doing so of your own free will and consent. However, should you choose to refrain from providing us with certain categories of your personal data (indicated as such in the application system), we will not be able to consider your employment application or to fully and effectively process your employment application.

What personal data we collect about candidates? The personal data that we collect about candidates may include the following: full name, address, telephone number, email address, professional experience, professional licenses (if applicable), salary expectations, education, employment history, the candidate's goals and interest in the position, and other relevant categories of personal data.

With whom do we may share or transfer to your personal data and for what purposes? Without derogating from the entities described above under "II. Who has access to your personal data?", we may also share some or all of your personal data with our professional external advisors (e.g. legal advisors, accountants, etc.), governmental organizations or agencies, including law enforcement bodies and other external service providers who may process your personal data on our behalf. We will share or transfer your personal data with external entities only for the purposes described above (under "I. Use of your personal data"), to comply with legal obligations or in connection with legal proceedings, and we take steps to ensure that such external entities protect your personal data (including by having data processing agreements in place with such entities).

International transfers. We may share or transfer your personal data to external entities (as further described above) that may be located outside of the State of Israel, including in countries that may have different privacy and data protection laws than those of Israel.

Sources of personal data. We may also collect personal data from third parties such as publically available sources (including your social media profiles, if they are publically open), your prior employers or where you have authorized collection from such third parties.

Privacy Rights. Under Israeli law, you, as a data subject, have the right to request reviewing the personal data that we maintain about you, and to request its correction or deletion if you find that it is incorrect, incomplete, outdated or unclear. However, please note that we may refuse to fulfill a request to exercise privacy rights in accordance with Israeli law. For exercising your privacy rights, please send your request to

Boehringer Ingelheim Israel Ltd  
89, Medinat Ha-Yehudim Street  
Herzliya-Pituach  
Israel, 4676672

## **18. Notice for applications in Kazakhstan**

If you are a citizen of the Republic of Kazakhstan or applying for a position at a company based in the Republic of Kazakhstan, you hereby provide a voluntary and informed consent for the collection, processing, and cross-border transmission of your personal data, which you have transferred to the Boehringer Ingelheim Group and its technical service providers.

The consent extends to all your personal data indicated on this application platform, especially but not limited to: last name, first name, contact data (domicile address, telephone number, e-mail).

Personal data use by companies based outside of Kazakhstan: if you are applying for a position at a company based in Kazakhstan, or you are a citizen of Kazakhstan and provide your data from Kazakhstan, and your data is also being processed by a group company based outside of Kazakhstan (such as in the USA or in Germany), we will take measures to ensure an appropriate level of protection for such personal data in accordance with the Kazakhstan law regarding the protection of personal data; furthermore, we also ensure that the respective personal data is only used for the purpose for which it is collected. The personal data you provide will not be shared with public sources.

This consent is provided for the period from the date your profile was released until three years have passed since the last update of your profile.

## **18. Notice for applications in Austria**

Storage period: personal or personally identifying data for applications in Austria is deleted after 7 (seven) months of inactivity in the application system.

## **19. Notice for applications in Vietnam**

If you are applying for a position at a company of Boehringer Ingelheim Group in Vietnam, the following applies:

We process all of the data listed in your application form and applicant profile, including: name, gender, date of birth, nationality, academic qualification, work process and any other information you have voluntarily provided us for the purposes listed in the section

1 (however, accordingly, personal data and sensitive data will be collected, processed and transferred to relevant departments within the company)

2 for similar purposes. Subject to a provision provided by applicable law, your application form, and your personal data are stored, used and provided until the aforementioned purposes of Boehringer Ingelheim Group have been fulfilled. In writing, you are informed that you have the right to refuse to provide such data; however, in the event of refusal to provide such a declaration of consent, you will not be able to apply recruitment procedures in the companies of the Boehringer Ingelheim group through this application platform.

In accordance with the Data Protection Law and matters relating to Decree 13/2023/ND-CP in Vietnam on the protection of your personal data, you are the data subject having the following rights:

- a. You may request details in accordance with the provisions of this Policy or make corrections to your personal data held by BI in accordance with the BI guidelines.
- b. You also have the rights under the Law Provisions including withdrawing consent to the processing of personal data, requesting the deletion of personal data, objecting to or limiting the use or processing of your personal data in some cases. However, these rights will be required to conform to the relevant Laws.
- c. Please contact BI (see the "Contact Information" section below) for details on how you can request access to, correct or exercise your rights to the processing of your personal data.
- d. You protect your personal data yourself; respect, protect other people's personal data.
- e. Provide complete, accurate personal data to us in accordance with this Personal Data Protection Policy.

If you have any questions about our processing of your Personal Data, or would like more information, or to exercise any of your rights, please contact our Data Protection Officer directly in the below details:

Boehringer Ingelheim Vietnam - 14th Floor, M Plaza, 39 Le Duan Street, Ben Nghe Ward, District 1, Ho Chi Minh City.

Data Protection Officer - Tel: (028).3823.6919

Email: [legdpovn.vn@boehringer-ingelheim.com](mailto:legdpovn.vn@boehringer-ingelheim.com)

Refer to our Privacy Policy at <https://www.boehringerone.com/vn/privacy> for details of your rights and our consent withdrawal process.