www.careers.vantagetowers.com - Privacy Notice

With this privacy notice we would like to inform you on the processing of your personal data when you visit and navigate in www.carreers .vantagetowers.com ("website")

Last updated: 17.04.2023

Who we are :

We are Vantage Towers AG. Our registered office is Vantage Towers AG, Prinzenallee 11-13, 40549 Düsseldorf. We are registered in Germany with the commercial register of the Local Court (Amtsgericht) of Düsseldorf under HRB 92244

1. What is the identity and the contact details of the responsible for the processing of your personal data:

a) Data Controller - who is responsible for data processing

Vantage Towers AG

Address: Prinzenallee 11-13, 40549 Düsseldorf.

E-Mail: info@vantagetowers.com

b) Contact our Group Data Protection Officer

Vantage Towers AG - Attn: Data Protection Officer

Postal Address : Prinzenallee 11-13, 40549 Düsseldorf, Germany

E-Mail: privacy@vantagetowers.com

In this privacy notice:

- "we/us" means Vantage Towers AG
- "third party" means someone who is not you or us; and
- "Vodafone Group" means Vodafone Group Plc

2) What categories of personal data we collect and process, for which purposes and on what legal basis :

a) Personal data that we process based on your consent (Art. 6 para. 1a GDPR):

 Data that we process from the use of tracking mechanisms/ cookies by Google Analytics and Google Maps like your IP address and other personal data such as the browser you use, your surfing behavior, your location and the referrer -URL. The purpose of this processing is the collection of statistics on the use of the website (reach measurement) to analyze visitor behavior and improve the user experience with the site.

You can find more information about the tracking mechanisms, and you can change your cookies preferences in the Cookie Settings placed in the footer of the website here. You can also use browser settings to prevent Google from processing your personal data. <u>Here</u>, you will find information regarding a browser add-on to deactivate Google Analytics.

 Data that we process when you use the social media plug-ins in our website (LinkedIn, Kununu, Xing, Twitter, Glassdoor, YouTube), like your IP address. On our page, we only use the pictograms of the respective social media network. Only when you click on the pictogram are you directed to the Vantage Towers AG page on the respective social media platform. The social media platforms as well as the third-party content providers that can be reached via the pictograms provide these services and the processing of the data is under their own responsibility. By activating the social media plugin or link via the pictogram, also for sharing content, (Art. 6 para. 1a GDPR), the following data may be transmitted to the social media providers: IP address, browser information, operating system, screen resolution, installed browser plug-ins such as Adobe Flash Player, the previous page when you followed a link (referrer), the URL of the current page, etc.

The next time the page is accessed, the social media plug-ins are provided again in the default inactive mode, so that it is ensured that no data is transmitted when the page is visited again. For more information on social media plug-ins regarding the scope and purposes of the respective data processing as well as further information relevant to data privacy, please refer to the privacy policies of the respective responsible party:

- i. For LinkedIn, here
- ii. For Twitter, <u>here</u>
- iii. For Kununu, here
- iv. For Xing, here
- v. For YouTube, here
- vi. For Glassdoor, here
- Data that we process when you use the **Save Job Category**, like your email address, first and last name and salutation that you submit in the Contact Data Form for the purpose of receiving a notification from us on jobs posted of your preferred category and geographical area.

You can withdraw your consent, at any time, effective for the future by sending an email **"Exercise of personal data rights"** to <u>privacy@vantagetowers.com</u> in attention of the Group Data Protection Officer, describing the consent you want to withdraw.

b) Personal data we process based on our legitimate business interests (Art.6 para. 1 f GDPR):

Processing is carried out after careful weighing of our legitimate interests in relation to the need to protect your personal data and is limited to the absolutely expected and necessary processing, which is compatible with our transactional relationship: Data that we process when you navigate our website like the one that your browser transfers to us: IP address, browser (fetched from User Agent string), website from which the request originated (Referrer), operating system (fetched from User Agent string), content of the request. The purpose of the processing is the delivery of the website to the user's computer and it is mandatory for the operation of the website.

3) Who do we share your data with and for what purposes

Recipients of your personal data may be third companies with whom we cooperate for the purpose of providing the website to you, providing the service that you have requested via the website, improving our website, detecting possible security deficiencies or user intervention.

- talentsconnect AG located in Germany, for the purpose of the development and improvement of our website
- Google LLC located in USA, for the purpose of analyzing visitor behavior and improving user experience (Google analytics)
- Mailjet SAS, located in France for the purpose of mail transaction when you choose the Save Job Category option, and you receive the one-time email with information on the job category you selected
- Other Vantage Towers entities and members of the Vodafone Group, for the purpose of providing to you the services or the information that you requested

In these cases, the third-party companies are processing on behalf of Vantage Towers AG and undertake the execution of a specific project following our instructions and applying the strict procedures of Vantage Towers AG regarding the processing of your personal data (Art.28 para.3 GDPR). In these cases, Vantage Towers AG is still responsible for the processing of your personal data.

4) Services from other companies (independent third-party providers

We have integrated services from third-party providers who provide their services under their own responsibility. In the process, data is collected by means of cookies or similar technologies when using our website and transmitted to the respective third party. Partly for Vantage Towers AG own purposes.

The legal basis for this tool is Art. 6 (1a) or Art. 49 (1a) GDPR. For information as to what extent, for what purposes and on what legal basis further processing for the third-party provider's own purposes takes place, please refer to the data protection policy of the third-party provider. You can find the information on the independent third-party providers below.

a) Google

Google Maps

On our website, e.g., in the Find your next opportunity, we use Google Maps to display maps, locations for job finding planning. Google Maps is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. By embedding Google Maps, your IP address is transmitted directly to Google and a cookie is stored as soon as you visit such a page. You can get informed about data processing by Google at <u>here</u> at any time and have the possibility to object to it.

• YouTube videos

YouTube collects data to provide better services to users – from determining basic information, such as your language, to more complex issues, such as advertising. The information YouTube collects and how it is used depends on how you use the services and how you manage your privacy settings.

If you are not logged into a Google account, the data collected is stored with unique identifiers associated with the browser, app, or device. This can ensure, for example, that language settings are maintained across all sessions.

If you are logged into a Google account, data is also collected that is stored in your Google account and is considered personal data.

You can find more information here

5) International data transfers

Your personal data is processed in Germany and other European countries. If, in exceptional cases, processing of your data also takes place in countries outside the European Union (in so-called third countries), this will happen,

- if you have expressly consented to this (Art. 49 para. 1a GDPR). (In most countries outside the EU, the level of data protection does not meet EU standards. This applies in particular to comprehensive monitoring and control rights of state authorities, e.g., in the USA, which disproportionately interfere with the data protection of European citizens,
- or insofar as it is necessary for our provision of services to you (Art. 49 Para.1 GDPR),
- or insofar as it is provided for by law (Art. 6 Para. 1c GDPR).

Furthermore, your data will only be processed in third countries if certain measures ensure that an adequate level of data protection exists (e.g., adequacy decision of the EU Commission or so-called suitable guarantees, Art. 44ff GDPR).

We do not make your personal data available to third parties, unless you have granted your consent, or we are legally obliged to disclose the data.

6) Automated decision-making system, including profiling:

We use your personal data to make automated decisions, including profiling.

7) How long we keep your personal data for:

- Your browser data except from your IP address will be stored for the duration of the session and be deleted once the session is off. We retain your personal data for the purpose of providing the website to you.
- Your IP address will be stored for 30 days starting from the end of the session, for the purpose of addressing possible events of data security deficiencies or user intervention. Your IP address will be anonymized following the 30days retention period.
- Your email address, salutation, first name, last name and content of the email when you use the Save Job Category service, is retained for the purpose of notifying you on job vacancies posts of the category and the geographical area

you selected. Mailjet SAS, is storing your personal data on behalf of Vantage Towers AG. You can get informed on about data processing from Mailjet SAS here

8) What your rights are as a user of our website, in relation to the processing of your personal data (Data Subjects Rights):

- a. To request **information** on the categories of data processed, the purposes of processing, any recipients of the data, or the planned storage period (Art. 15 GDPR);
- b. to demand the correction or completion of incorrect or incomplete data (Art. 16 GDPR);
- c. to **revoke** given consent at any time with effect for the future (Art. 7 para. 3 GDPR);
- d. to **object** to data processing that is to be carried out on the basis of a legitimate interest for reasons arising from your particular situation (Art. 21 (1) GDPR);
- e. in certain cases, within the framework of Art. 17 GDPR, to demand the deletion of data in particular, insofar as the data is no longer required for the intended purpose or is processed unlawfully, or you have revoked your consent in accordance with (c) above or declared an objection in accordance with (d) above;
- f. under certain conditions, to demand the **restriction** of data, insofar as deletion is not possible or the obligation to delete is disputed (Art. 18 GDPR);
- g. to **data portability**, i.e. you can receive your data that you have provided to us in a conventional machinereadable format, such as CSV, and transmit it to others if necessary (Art. 20 GDPR);
- to issue a complaint to the competent supervisory authority about the data processing (for telecommunication contracts: Federal Commissioner for Data Protection and Freedom of Information; otherwise: State Commissioner for Data Protection and Freedom of Information of North Rhine-Westphalia).

To exercise your rights, you can:

send an email "Exercise of personal data rights" to <u>privacy@vantagetowers.com</u> in attention of the Group Data Protection Officer, describing the right you want to exercise

How to lodge a complaint:

If you want to contact us about any of your rights or complain about how we use your persona data , contact <u>privacy@vantagetowers.com</u> and we will do our best to support.

If you are still not satisfied, you can lodge a complaint to the supervisor authority

Die Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen (https://www.ldi.nrw.de/) Postfach 20 04 44 40102 Düsseldorf

9) Keeping your personal data secure

We have specialized security teams who constantly review and improve our measures to protect your personal information from unauthorized access, accidental loss, disclosure or destruction.

Our website may provide links to third-party websites. We cannot be responsible for the security and content of such third-party websites. So make sure you read that company's privacy and cookies policies before using or putting your personal information on their site.

10) Our cookie policy

Cookies are tiny text files that are stored on your computer, tablet or mobile phone when you visit a website. The cookies mean that the website will remember you and how you've used the site every time you come back.

Cookies themselves don't hold personal information such as your name or bank details. And in many cases, we won't be able to link the information we collect by using a cookie back to you. They can, however, help us to find information once you're logged in or help us link your browsing information to you and your personal information, for example, when you choose to register for a service, white paper or newsletter.

First party cookies

First party cookies originate from the same domain as the website you're currently visiting. No first party cookies are used on the website

Third party cookies

We use Google analytic cookies to help us understand the use of the website – what works, what is broken, what is popular, what is less popular, when it is busiest, what types of browsers and devices are used to access the website and the content that it provides access to. This is not linked to the personal data that you have provided. We use the website analytics information to ensure and improve the user's experience and deliver a quality service, troubleshooting problems identified by the analytics.

We also use Google map cookies for the purpose of showing to you the location of the job offer. Please refer to par.4a for more information.

You can always opt out by changing your cookies preferences in the Cookies setting in the footer of the website.

Controlling your cookies

You can control how you use cookies in your browser. If you wish to restrict or block the cookies which are set by any website you should do this through the web browser settings for each web browser you use, on each device you use to access the internet.

Information on controlling and deleting cookies, including on a wide variety of browsers, is also available at allaboutcookies.org