



DATA PROTECTION

Privacy Policy – Recruitment

This Policy sets out what personal data we collect, for what purposes and your rights in this respect

What does this Privacy Notice cover?

This Privacy Policy provides information about personal data which are processed by ubitricity GmbH ('ubitricity') which are part of the Shell group of companies ('Shell') in relation to individuals who apply to work for, or who attend a recruitment event or undertake an assessment with ubitricity. This includes prospective employees, interns and contractors.

For individuals who are successful in their application for employment, internship or engagement as a contractor, the Privacy Policy – ubitricity Employee, Contractor and Dependents' Personal Data available at <https://www.ubitricity.com/privacy-policy/> will apply.

As well as this Privacy Policy, bespoke privacy Policies and supplementary privacy statements may contain further information about how ubitricity is processing your personal data. In those instances, such Privacy Policies will be communicated to you separately.

This Privacy Policy explains what personal data we process about you, why we are processing your personal data and for which purposes, how long we hold your personal data for, how to access and update your personal data, as well as the options you have regarding your personal data and where to go for further information.

Special Policy - if you are under 18 years old and wish to apply for an ubitricity sponsored education or innovation event

Except in those cases where ubitricity organises educational events specifically designed for children; we do not intentionally collect personal data of individuals under 18 years old. If you are under 18 years old please do not send us your personal data for example, your name, address and email address. If you wish to contact ubitricity in a way which requires you to submit your personal data (such as for education or innovation events) please get your parent or guardian to do so on your behalf.



The categories of personal data we collect about you.

What personal data do we process about you? Collection of information

We process personal information relating to individuals who apply to work for, or who attend a recruitment event and/or undertake an assessment ('Applicants').

This may include personal contact information, date of birth, gender, whether you have the legal right to work in the country in which you have applied, your application for employment, your qualifications and experience, results of interviews and assessments.

Sensitive personal data

For the purposes of recruitment, special categories of data ('sensitive personal data') including personal data regarding health data may be processed only as strictly required and as permitted or required by local law for the purposes of making adjustments to the recruitment process, for assessing eligibility for positions and fitness to work and provision of facilities in the workplace to accommodate health problems or for the establishment, exercise or defense of claims.

In addition, in order to ensure equal employment opportunities as permitted or required by local law, we may also gather additional sensitive personal data regarding Applicants, including their nationality, racial and/or ethnic origin.

Why do we process your personal data?

We only process personal data of Applicants:

- in order to take steps at the request of the Applicant prior to entering into a contract;
- where it is necessary to comply with a legal obligation to which ubitricity is subject to ensure compliance with applicable employment, social security laws and regulations;
- where it is necessary for the legitimate business interests of ubitricity (such as ensuring compliance with legal obligations other than those related to employment or social security, the protection of ubitricity assets, reputation and ubitricity employees and contractors) except where such interests are overridden by the interests or fundamental rights and freedoms of the Applicant; or
- if legally required, with the explicit consent of the Applicant.



The purposes for which we process your personal data.

In those cases where processing is based on consent and subject to applicable local law which provides otherwise, you have the right to withdraw your consent at any time. This will not affect the validity of the processing prior to the withdrawal of consent.

For what purposes do we process your personal data? How will we use your personal data?

We process your personal data for the following purposes:

- Human Resources, personnel management, business process execution and internal management - including resource planning, and recruitment;
- Health, safety and security - including protection of an individual's life or health, occupational health and safety, protection of ubitricity's assets and staff, authentication of individual status and access rights;
- Legal and/or regulatory compliance - including compliance with legal or regulatory requirements; or
- Management reporting and analysis - including statistical analysis and surveys regarding the quality of the recruitment process.

We may also process your personal data for a secondary purpose where it is closely related, such as:

- storing, deleting or anonymising your personal data;
- fraud prevention, audits, investigations, dispute resolution or insurance purposes, litigation and defence of claims; or
- statistical, historical or scientific research.

Pre-screening of Applicants

We carry out screening of all Applicants who we intend to make an offer of employment, engagement or internship (as the case may be) and prior to any offer being confirmed for the purposes of:

- verifying the information that an Applicant provides during the screening/interview process. This will include verifying information with current/previous employers and educational institutions. No steps will be taken in this respect until the Applicant confirms the verification can take place;
- screening Applicants against publicly available or government issued sanctions lists and media sources. This is to comply with legal and regulatory obligations,



to protect ubitricity's assets and employees/contractors and specifically to ensure that ubitricity can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements.

In addition, successful applicants may need to undergo a criminal records/policy check where deemed relevant to the role being applied for e.g role in finance.

- All applicants must answer questions and produce evidence which are necessary to ensure that individuals can lawfully enter into a contract with a ubitricity company if they are successful in their application.

Who is responsible for any personal data collected?

ubitricity Gesellschaft für verteilte Energiesysteme mbH, a German limited liability company, registered with the Commercial Court Charlottenburg under no. HRB 113 258 B, with offices located at EUREF-Campus 7-8, 10829 Berlin, Germany, will be responsible for processing your personal data, either solely or jointly with its affiliates within the Shell group of companies.

Who will we share the personal data with?

Your personal data are exclusively processed for the purposes referred to above and will only be shared on a strict need to know basis with:

- Other companies within the Shell group of companies, including to those which may be located outside of your location and/or the Economic European Area ('EEA');
- Authorized third party agents, service providers, external auditors and/or subcontractors of ubitricity in particular authorised third parties who carry out reference and background checks on behalf of ubitricity;
- A competent public authority, government, regulatory or fiscal agency where it is necessary to comply with a legal or regulatory obligation to which ubitricity is subject to or as permitted by applicable law; or
- Any person to whom ubitricity proposes to transfer any of its rights and/or duties.

Your personal data may be transferred outside of your country,

Transfers of your personal data to other countries

Where your personal data have been transferred to companies within the Shell group and/or to authorized third parties located outside of your country (including outside of



subject to appropriate safeguards.

the European Economic Area) we take organizational, contractual and legal measures to ensure that your personal data are exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented in order to safeguard your personal data. These measures include Binding Corporate Rules for transfers among the Shell group and for Shell companies in the EU, European Commission approved transfer mechanisms for transfers to third parties as well as any additional local legal requirements. You can find a copy of Shell Binding Corporate Rules at www.shell.co.uk/privacy.html or by contacting privacy-office-SI@shell.com.

Shell is committed to safeguarding your personal data.

Security of your personal data

We have implemented technology and policies with the objective of protecting your privacy from unauthorised access and improper use and will update these measures as new technology becomes available, as appropriate.

Shell only holds your personal data for a defined period of time.

How long do we hold your personal data for?

We hold personal data of unsuccessful Applicants for at least six (6) months but no longer than three (3) years after the recruitment process or assessment has been completed unless there is a lawful reason to retain it for longer, in which cases it will be deleted once no longer needed for that purpose (for example to defend any claims).

If you are successful in your application, the personal data gathered through the recruitment process will be retained in line with the Privacy Policy - Employee, Contractor and Dependents' Personal Data, which is available at <https://www.ubitricity.com/privacy-policy/>

What are the consequences of not providing your data?

Personal data requested and provided by Applicants are required in order to fulfil legal requirements and/or which is required for entering into a contract with you (or in the case of a contractor your employer/service provider). Failure to provide us with the information requested which is limited to that required for these purposes will negatively affect your chances of being selected for any potential employment, engagement or internship.

Your rights and how to exercise them.

Your rights in relation to your personal data

We aim to keep our information about you as accurate as possible. You can request:



- access to your personal data;
- correction or deletion of your personal data (in the case of deletion, only where it is no longer required for a legitimate business purpose);
- that the processing of your personal data is restricted; and/or
- that you receive personal data that you have provided to ubitricity, in a structured, digital form to be transmitted to another party, if this is technically feasible.

To make any of these requests, please contact a member of the ubitricity HR team. If you are a contractor you should speak with your external contracting/employing company/agency. For former employees or dependents, please contact privacy@ermpower.com.au or the Shell group email privacy-office-SI@shell.com.

Who can you contact if you have a query, concern or complaint about your personal data?

If you have any issues, queries or complaints regarding the processing of your personal data, please contact us at dataprotection@ubitricity.com for further information or for submitting such requests.

You may also contact the Shell Group Chief Privacy Office at Shell International B.V. The Hague, The Netherlands - Trade Register No. 27155369 Correspondence: PO Box 162, 2501 AN, The Hague, at privacy-office-SI@shell.com.

If you are unsatisfied with the handling of your personal data by Shell, then you have the right to lodge a complaint with the German Federal Data Protection Commissioner or the German States Data Protection Commissioners responsible for you or the Dutch Data Protection Authority whose address is Prins Clauslaan 60, 2595 AJ The Hague, The Netherlands. Please visit <https://autoriteitpersoonsgegevens.nl/en> or https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html for more information.

Changes to this Privacy Notice

This Privacy Notice is updated periodically. This Privacy Notice was last updated in May 2021.