

Data privacy notice

Thank you for your interest in working for ITW. The protection of your personal data is very important to us. This data privacy notice serves to inform you about how your personal data is processed when you use our application portal to apply for a job with us as well as about your related rights.

A. WHAT PERSONAL DATA IS PROCESSED ABOUT ME?

When you visit or apply for a job via our application portal, the following categories of personal data are processed about you:

1. Online usage data, in particular your IP address, the type and version of your browser, your operating system, the website from which you arrive at the application portal, the subpages and job adverts you access, the date and time of your access and other, similar data;
2. Log-in data, in particular your e-mail address and password (in encrypted form) you use to log-in in the application portal, the date, time and duration of your log-ins and other, similar data;
3. Data associated with cookies, which are small text files placed on your computer or other device to exchange certain settings and data with our systems via the browser. A cookie generally contains the name of the domain from which the cookie data were sent, as well as information on the age of the cookie and an alphanumeric identifier. It may contain further information in which case you can find more details below; and
4. Application data, i.e. information you provide or input during the application process or job alert creation. This usually comprises
 - a. contact data, in particular your name(s), titles, physical and/or electronic address, telephone number;
 - b. information about your professional aptitude, in particular qualifications, experience, education, skills, employment history, academic credentials, certificates, awards, letters of reference, abilities, memberships, answers to screening questions or in interviews, information on health in case of disabilities, other curriculum vitae information you may choose to provide, including but not limited to special interests and hobbies;
 - c. information about your professional preferences, in particular the job you apply for, motivation, future ambitions; and
 - d. photograph(s) that you may choose to provide.

B. FOR WHAT PURPOSES IS MY PERSONAL DATA PROCESSED?

Your online usage data, log-in data and personal data associated with cookies may be processed to make the application portal accessible and usable, to detect and resolve any technical problems, and to prevent and, if necessary, prosecute any misuse of the application portal. The legal basis for this processing activity is Article 6(1)(f) Regulation (EU) 2016/679 and UK GDPR (General Data Protection Regulation – “**GDPR**”).

Your application data may be processed for the purpose of handling your application, in particular to decide on whether you are the right applicant for the job in question and establish an employment relationship with you, if applicable. The legal basis for this processing activity is Article 6(1)(f) GDPR as referenced above and in conjunction with relevant applicable local laws such as section 26(1), (3) of the Federal Data Protection Act (*Bundesdatenschutzgesetz* – “**BDSG**”).

Your application data may also be processed to prepare for and deal with any claims you may raise, in particular in court, should your application be rejected. The legal basis for this processing activity are Articles 6(1)(f), 9(2)(f) GDPR.

If you give your consent, your application data may also be processed to consider you for future job opportunities. In that case, the legal basis for this processing activity is your consent in accordance with Article 6(1)(a) GDPR (in conjunction with relevant applicable local laws such as section § 26(2) BDSG. You may withdraw your consent at any time with future effect by contacting us at applicantprivacy@itw.com

C. WHO IS RESPONSIBLE FOR MY PERSONAL DATA?

When you apply for a job via our application portal, your personal data will be processed primarily by the ITW entity which has advertised the respective vacancy as controller within the meaning of Article 4 no. 7 GDPR. You can generally find out the ITW entity which has advertised the respective vacancy by reviewing the job application which you have chosen to apply to. If you have trouble finding out which ITW entity is the controller in your case, please contact us at applicantprivacy@itw.com and we will quickly provide this information. You can also find a list of the relevant ITW entities in your country [itw-eea-entities-list.pdf](#)– maybe that already answers your question.

You can contact the relevant ITW company and/or relevant data protection officer, if applicable. Please refer to the list [itw-eea-entities-list.pdf](#)

Please note that because ITW is a group of entities which work closely together, it may be necessary to share your application data with employees at other ITW group entities. These other ITW group entities will then also act as controllers of your personal data. You can find a list of all relevant ITW group entities [itw-eea-entities-list.pdf](#).

Please note that any processing of your personal data that may occur on the more general platform of SmartRecruiters, Inc. (225 Bush Street, Suite #300, San Francisco, CA 94104, USA – “**SmartRecruiters**”) before you arrive on our ITW application portal is done by SmartRecruiters as its own, separate controller. Please refer to SmartRecruiters, Inc. and/or the privacy policy on their homepage for more information.

D. WHO WILL RECEIVE MY PERSONAL DATA?

As noted above under section C, your personal data may be shared with other ITW group entities to the extent this is necessary for handling your application. The legal basis for sharing your personal data is Article 6(1)(f) GDPR and in conjunction with relevant applicable local laws such as section 26(1), (3) BDSG where the data is shared with potential future colleagues and supervisors who are involved in the application procedure, and Article 6(1)(f) GDPR where the data is shared with other ITW entities because they perform centralized functions within ITW group, in particular HR or Compliance.

In addition, your personal data may be shared with companies or other bodies with a particular expertise or function in individual areas, e.g. tax auditors, lawyers, consulting firms, courts and/or regulatory authorities. These are either subject to a statutory duty of confidentiality or have been obliged to maintain confidentiality by us. The legal basis for sharing your personal data with these entities will typically be Article 6(1)(f) GDPR.

For certain technical data processing tasks, we are assisted by third-party service providers which have been carefully selected and meet high data privacy and data security standards. They are subject to strict duties of confidentiality and process personal data only on our behalf of and in accordance with our instructions (cf. Art. 28 GDPR).

As one of these service providers, SmartRecruiters provides technical data processing tasks (e.g., data hosting) in connection with our application portal. Other than on their general web portal, in this instance SmartRecruiters is acting as a processor (and not as a controller). They may not provide personal data we share with them for the purposes of receiving their services to other customers or use this data for their own purposes.

Moreover, we may transfer your data to third parties if we have your consent to do so or if we are obliged to do so under law or by an administrative or court order. The legal bases for such data sharing are your consent in conjunction with Article 6(1)(a) GDPR, Article 6(1)(c) GDPR in conjunction with the relevant statutory obligation or Article 6(1)(f) GDPR, respectively.

E. WILL MY PERSONAL DATA BE TRANSFERRED TO THIRD COUNTRIES?

The personal data processed in connection with our application portal is stored in Frankfurt, Germany. However, SmartRecruiters as the service provider tasked with hosting your data and ITW,

Inc. as its direct principal are established in the USA. To ensure that your personal data is nevertheless protected, SmartRecruiters is subject to the standard contractual clauses as approved by the European Commission for the transfer of personal data to countries outside the EU/EEA. We have also conducted a data transfer impact assessment and found that the fact that ITW, Inc. and SmartRecruiters are established in the USA does not subject your data to a disproportionate risk. If you would like to receive a copy of the standard contractual clauses or see the data transfer impact assessment, please contact us at applicantprivacy@itw.com

F. FOR HOW LONG WILL MY PERSONAL DATA BE STORED?

Your personal data will be erased if and when it is no longer necessary for the purposes described in this data privacy notice, unless a longer storage period is required by applicable law or the purpose of the processing lawfully changes. You will then be informed about such data processing and retention separately.

In case your application is rejected, your personal data will generally be stored for one year for the purpose of preparing and defending against potential claims as described under section B. Should you in fact raise a claim, your data will be retained for the duration of the legal proceedings and potentially beyond, if that is necessary to safeguard our legitimate interests. The legal basis for such retention is Article 6(1)(f) GDPR. After that, your data will be erased or anonymized.

Should your application be rejected but you give us your consent to store and process your personal data in order to consider you for future job opportunities, your data will generally be stored for one year. This may be extended for another one year each time you update your profile and thereby show that you are interested in being considered. It will then be erased or anonymized. If you withdraw your consent, your personal data will be deleted without undue delay.

G. WHAT ARE MY RIGHTS IN RELATION TO MY PERSONAL DATA?

You have the right to be provided with information about your personal data that are stored by us and, if certain legal requirements are satisfied, rights to rectification, erasure, and restricted processing, as well as the right to object to data processing. In addition, you have the right to receive personal data that you have made available to us in a structured, standard, and machine-legible format. This includes the right to transfer such data to another controller. If technically feasible, you may also demand that we transfer your personal data directly to other controllers.

If you have given us consent to process your personal data, you may withdraw such consent at any time with future effect.

If the processing of your personal data is based on Article 6(1)(f) GDPR, you have the right to object to this processing under the conditions described in Article 21 GDPR.

You may also lodge complaints with a supervisory authority.

No automated decision-making takes place on our application portal.

I. HOW CAN I SELF-MANAGE MY PERSONAL DATA?

Our application portal provides for certain features which allow you to manage your personal data autonomously. In certain cases, you can even directly exercise the rights described above under section G by making use of these features. In particular, you can:

1. modify, rectify and alter your personal data in the “My SmartProfile section”;
2. withdraw your application and delete your profile; and
3. export your profile in a machine-readable format.

Version/date: 0.2, 28 October 2021