PM-Group

Simple. Successful.

PM-International Applicant Privacy Notice

(Recruitment and Application Management)
Effective Date: May 2026
Version: 1.0

1. INTRODUCTION

PM-International AG and its affiliated group companies ("PM-International", "we", "our", or "us") are committed to protecting the privacy and personal data of individuals applying for employment opportunities with us.

This Applicant Privacy Notice explains how we collect, use, store, disclose, and protect personal data during the recruitment and hiring process in accordance with the EU General Data Protection Regulation ("GDPR") and applicable data protection laws.

This notice applies to all candidates applying through our recruitment channels, including:

- PM-International career portals
- Recruitment management systems
- Professional networking platforms
- External job boards
- Recruiters or referrals

including but not limited to the following service providers and platforms:

- Lever
- BambooHR
- LinkedIn
- jobs.lu
- Moovijob

2. DATA CONTROLLER

The data controller responsible for the processing of your personal data is:

PM-International AG

15, Wäistrooss
L-5445 Schengen
Luxembourg

Email: DPO@PM-International.com
Phone: +352 339 667 0

Depending on the position applied for, another PM-International group entity may jointly participate in the recruitment process where relevant.

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3. CATEGORIES OF PERSONAL DATA WE PROCESS

During the recruitment process, we may collect and process the following categories of personal data:

Identification and Contact Information

- Full name
- Address
- Telephone number
- Email address
- Date of birth (where relevant)

Application Information

- Curriculum Vitae / Resume
- Cover letter
- Employment history
- Educational background
- Qualifications and certifications
- Language skills
- References and recommendation letters

Recruitment Process Information

- Interview notes and assessments
- Screening responses
- Salary expectations
- Availability and work authorization information
- Communications relating to your application

Online and Platform Data

Where applications are submitted via third-party platforms, we may receive:

- Public professional profile information
- Application metadata
- Platform-generated candidate identifiers
- Communication history within recruitment platforms

Voluntarily Provided Information

- Any additional information you choose to provide during the application process.

Please do not provide special categories of personal data (e.g. health data, religious beliefs, political opinions) unless specifically requested and legally permitted.

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4. SOURCES OF PERSONAL DATA

We may collect personal data:

- Directly from you
- Through recruitment platforms and job boards
- From recruiters or referral partners
- From publicly available professional sources (e.g. professional networking profiles)
- From references you authorize us to contact

5. PURPOSES OF PROCESSING

We process applicant personal data for the following purposes:

- Managing and evaluating applications
- Assessing qualifications and suitability for employment
- Conducting interviews and recruitment assessments
- Communicating with applicants
- Verifying information provided by candidates
- Managing hiring decisions
- Maintaining recruitment records
- Complying with legal and regulatory obligations
- Defending legal claims where necessary
- Improving recruitment processes and applicant experience

6. LEGAL BASES FOR PROCESSING

We process your personal data under one or more of the following legal bases under Article 6 GDPR:

- Legitimate Interests

Processing is necessary for our legitimate interest in managing recruitment processes and selecting suitable candidates.

- Steps Prior to Entering into a Contract

Processing is necessary to take steps at your request prior to entering into an employment contract.

- Legal Obligations

Processing may be required to comply with applicable employment, anti-discrimination, corporate, or regulatory obligations.

- Consent

Where required by law, or for specific optional processing activities (such as retaining your application for future opportunities), we will rely on your consent.

You may withdraw consent at any time without affecting the lawfulness of processing carried out before withdrawal.

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7. AUTOMATED DECISION-MAKING

PM-International does not make recruitment decisions based solely on automated processing that produces legal or similarly significant effects within the meaning of Article 22 GDPR.

8. DATA SHARING AND RECIPIENTS

Your personal data may be shared with:

Internal Recipients

- Human Resources personnel
- Hiring managers
- Relevant PM-International group entities involved in recruitment

External Service Providers and Recruitment Platforms

We use carefully selected service providers acting as processors or independent controllers where applicable, including:

- Lever, 1125 Mission St, San Francisco, CA 94103, United States
- BambooHR, 42 Future Way, Draper, UT 84020, United States
- LinkedIn, 1000 W. Maude Ave, Sunnyvale, CA 94085, United States
- jobs.lu, Rue des Mérovingiens, L-8070 Bertrange, Luxembourg
- Moovijob, 24-28 Rue Goethe, L-1637 Luxembourg City, Luxembourg

These providers may process personal data on our behalf to support:

- Job publication
- Candidate sourcing
- Application management
- Interview coordination
- HR administration

Where providers act as processors, we maintain data processing agreements in accordance with Article 28 GDPR.

Legal and Regulatory Authorities

We may disclose personal data where required by law, legal process, or regulatory obligations.

9. INTERNATIONAL DATA TRANSFERS

Some of our service providers may process personal data outside the European Economic Area ("EEA").

Where personal data is transferred internationally, PM-International ensures appropriate safeguards are implemented in accordance with GDPR requirements, including:

- European Commission adequacy decisions
- Standard Contractual Clauses (SCCs)
- Additional technical and organizational safeguards where necessary

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10. DATA RETENTION

Applicant data will generally be retained:

- For the duration of the recruitment process; and
- For up to 2 years after the conclusion of the recruitment process,

unless:

- A longer retention period is required by law;
- Legal claims require longer preservation; or
- You consent to retention for future employment opportunities.

If hired, relevant applicant data will become part of your employee personnel file and will be processed in accordance with applicable employee privacy notices.

11.DATA SECURITY

PM-International implements appropriate technical and organizational security measures to protect personal data against unauthorized access, disclosure, alteration, loss, or destruction.

Measures include:

- Role-based access controls
- Encryption and secure transmission methods
- Confidentiality obligations
- Security monitoring and assessments
- Processor due diligence procedures

12. YOUR RIGHTS UNDER GDPR

Subject to applicable legal conditions, you have the following rights:

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to object
- Right to data portability
- Right to withdraw consent at any time
- Right to lodge a complaint with a supervisory authority

To exercise your rights, please contact:
DPO@PM-International.com

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13. COMPLAINTS

You also have the right to lodge a complaint with the competent data protection supervisory authority, particularly in the EU Member State of your habitual residence, workplace, or alleged infringement.

For Luxembourg, the supervisory authority is:

Commission Nationale pour la Protection des Données (CNPD)

General Email: info@cnpd.lu, Official Website: cnpd.public.lu

Complaints Handling: plaintes@cnpd.lu

14. UPDATES TO THIS PRIVACY NOTICE

We may update this Applicant Privacy Notice from time to time to reflect legal, operational, or technological changes.

The latest version will always be made available through our recruitment channels and career platforms.

15. CONTACT

For any questions regarding this Applicant Privacy Notice or the processing of your personal data, please contact:

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