

Data protection declaration for the Jungheinrich online application process, onboarding process and maintenance of an employment relationship

This data protection declaration applies in addition to our existing [Data Privacy Notice](#), in which we provide you with detailed information on the nature, scope and purpose for which personal data is used within our online offering or in areas not specifically related to job applications.

We, Jungheinrich Lift Truck India Private Limited (A-404, 4th Floor, Delphi "A" Wing Central Avenue, Hiranandani Business Park, Powai, Mumbai, Maharashtra 400076 India), the responsible data fiduciary in terms of the data protection laws, welcome your interest in working for our company and are happy to receive your online application.

We process applicants', onboardees' and employees' personal data solely in compliance with the relevant data privacy provisions, including the Digital Personal Data Protection Act, 2023 ("DPDPA"). This means that applicant, onboarder and employee data is processed only where legally permitted, i.e. where data processing is legally required, the applicant/onboarder/employee has provided consent in accordance with Section 6 of the DPDPA or permitted as a legitimate use under Section 7 of the DPDPA.

In this section, we will explain to you how we collect, use, disclose and otherwise process your personal data as part of a job application, onboarding and employment process – in accordance with Section 5 of the DPDPA.

1. Data collection

We collect and store all data that you make available to us through your application. Therefore, when you apply online, we collect and process the below categories of personal data, if required and applicable:

For application purposes:

- Application information
 - Information about your application at Jungheinrich in the recruiting process (e.g. your CV, cover letter, photo, references, certificates and similar, etc.)
- Personal Data
 - Personal demographic data (e.g. your name, first name, date of birth, place of birth, etc.)
 - Communication data (e.g. your addresses, phone number, email address, etc.)
- Any other voluntarily provided personal data

In addition, we collect and process data of the following categories connected to the job requisition, your application or your profile:

- Employment information
 - Organizational data (e.g. past department, position title, job categorization, etc.)
 - Compensation data (e.g. past gross salary, incentive information, bank account number, etc.)

In addition, for onboarding purposes of applicants who signed an employment contract:

- Personal Data
 - Personal demographic data (e.g. your name, first name, date of birth, place of birth, education, etc.)
 - Communication data (e.g. your addresses, phone number, email address, etc.)
 - Identification data (e.g. your passport number, and other government-issued identity document details, etc.)
 - Statutory identification numbers, where applicable, such as Permanent Account Number (PAN), voter ID and driving licence details, where required for employment,

payroll, tax, statutory compliance or identity verification purposes. Where you voluntarily provide your Aadhaar number, it will be processed in accordance with applicable Aadhaar requirements and, where feasible, using masked Aadhaar or UIDAI-approved offline verification mechanisms.

- Statutory registration numbers (e.g. your Universal Account Number (UAN) for the Employees' Provident Fund, your Employees' State Insurance (ESI) Insured Person Number and bank account details for salary crediting)
- Any other voluntarily provided personal data
- Employment information
 - Organizational data (e.g. past department, position title, job categorization, etc.)
 - Compensation data (e.g. past gross salary, incentive information, bank account number, etc.)

In addition, in case an employment is established, for maintenance of the employment:

- Personal data
 - Personal demographic data (e.g. your name, first name, date of birth, place of birth, marital status, nationality, gender, education etc.)
 - Communication data (e.g. your addresses, phone number, email address, etc.)
 - Identification data (e.g. your passport number, and other government-issued identity document details, etc.)
 - Statutory identification numbers, where applicable, such as Permanent Account Number (PAN), voter ID and driving licence details, where required for employment, payroll, tax, statutory compliance or identity verification purposes. Where you voluntarily provide your Aadhaar number, it will be processed in accordance with applicable Aadhaar requirements. Where identity verification does not require retention of the full Aadhaar number, masked Aadhaar or a permitted offline verification mechanism will be used.
 - Statutory registration numbers (e.g. your Universal Account Number (UAN) for the Employees' Provident Fund, your Employees' State Insurance (ESI) Insured Person Number)
- Any other voluntarily provided personal etc.
- Employment information
 - Organizational data (e.g. past department, position title, job categorization, etc.)
 - Compensation data (e.g. past gross salary, incentive information, bank account number, etc.)
- Information about dependents / other contacts
 - Personal data about your dependents (e.g. children, dependants in case required, etc., where required for employment, benefits, insurance or other employment-related purposes). Where the personal data relates to a child or a person with a disability who has a lawful guardian, we will obtain verifiable consent from the parent or lawful guardian, as required under DPDPA.
 - Emergency contact (e.g. names, relationship, contact details, in case required, etc.)

If a position requires further collection of personal data, this will be clearly stated in the job advertisement.

If you apply through our job page, we may collect access information, for example the IP address of your access device. You can find more information about this in the [Data Privacy Notice](#) on our website.

2. Purpose of data processing and legal basis

We collect and process your personal data in order to carry out the recruitment process. The data you provide will be processed to handle your application and, in the event that an employment relationship is established, for the administration and maintenance of the employment relationship. This shall include:

- Assessing your suitability for the position applied for (or other suitable positions), including interviews, assessments and reference/background checks (where consented to and legally permitted);
- Administering onboarding and your employment contract;
- Processing payroll and statutory contributions/filings, including under the Employees' Provident Funds and Miscellaneous Provisions Act, 1952, the Employees' State Insurance Act, 1948, the Payment of Gratuity Act, 1972, and, as they take fuller effect, the corresponding provisions of the Code on Wages, 2019 and the Code on Social Security, 2020;
- Complying with our record-keeping, registers, working-conditions and safety obligations under the Industrial Relations Code, 2020, and the Occupational Safety, Health and Working Conditions Code, 2020, and, where applicable to foreign employees, immigration, visa and registration requirements under the Immigration and Foreigners Act, 2025 and related rules and FRRO requirements;
- Administering employee benefits, leave, maternity benefit, insurance and claims;
- Preventing corporate espionage, protecting trade secret, intellectual property and classified/confidential information and safeguarding our company from loss or liability; and
- Establishing, exercising or defending legal claims (e.g. before the Industrial Tribunal/Labour Court under the Industrial Relations Code, or the civil courts).

Data will not be processed for any other purpose. The legal basis for processing is your consent under Section 6 of the DPDPA and certain legitimate uses as permitted under the Section 7 of the DPDPA, including processing necessary for employment purposes and compliance with applicable laws.

If consent is required for processing (e.g. for inclusion in our pool of applicants), we will obtain your consent in accordance with the Section 6 of the DPDPA before doing so.

We can also process personal data insofar as this is necessary to defend against legal claims asserted against us in connection with the application process. The legal basis is for such processing includes certain legitimate uses under Section 7 of the DPDPA, and compliance with applicable legal and regulatory requirements in India.

If an employment relationship is established between both parties, we can process the personal data already received from you for the purposes of the employment relationship in accordance with Section 7 (i) of the DPDPA. This data is processed where necessary for the implementation or termination of the employment relationship or for the exercise or fulfilment of the rights and obligations arising under applicable law or an employment-related agreement.

3. Forwarding

Data is transferred to third parties only in line with legal requirements and only as set out in the data protection declaration.

Your data will be made available to the relevant employees of the Jungheinrich Group involved in the appropriate personnel selection process. The parties involved in the selection process may belong to other companies within the Jungheinrich Group. Consequently, your application data may be further disclosed within the Group. Such transfers will be carried out in accordance with Section 16 of the DPDPA, applicable Central Government notifications, other applicable Indian laws, and appropriate contractual, organisational and security safeguards. We will also comply with any applicable sector-specific or contractual requirements relating to data localisation, storage or transfer.

Where we use subcontractors (e.g. external recruitment agencies) to provide our services, we take appropriate legal precautions and corresponding technical and organisational measures to protect personal data in accordance with the relevant statutory provisions, and ensure that such subcontractors are subject to obligations consistent with the requirements of the DPDPA.

SAP Deutschland SE & Co. KG ("SAP") provides Jungheinrich AG (Friedrich-Ebert-Damm 129, 22047 Hamburg, Germany – "Jungheinrich AG") with the application system for recruitment, onboarding and employee master data base and acts as Jungheinrich's processor in this regard. The employees of SAP



will never access the applicant's personal data unless Jungheinrich AG has expressly authorised this in exceptional cases. All relevant employees of SAP are bound to confidentiality.

Jungheinrich AG administers and supports the mentioned application system and is to this extent a service provider (data processor) for its subsidiaries (data controllers), including us.

Personal data will also be disclosed to public authorities and/or law enforcement agencies if necessary for the above purposes, if required by DPDPA or any other applicable law in India or if necessary to comply with a lawful request, order or other legal requirement.

In the event that an employment relationship is established, the data is forwarded to internal or external processors solely in order to maintain the employment relationship.

Any further use or forwarding of your applicant data is excluded.

4. Data security

Your data will be transmitted in an encrypted manner and then stored in a database. Jungheinrich will save and process your data in accordance with the applicable data privacy regulations, including the DPDPA. Your data will always be kept confidential. All personal details that we collect and process as part of a job application are protected by technical and organisational methods against unauthorised access and manipulation. In the event of a personal data breach, we will take appropriate measures and notify you promptly and the Data Protection Board within the applicable statutory timeframe.

5. Retention (duration of processing)

Should no further action result from the application process, with no employment relationship being created, we will delete or cease to retain your personal data once it is no longer necessary for the recruitment process or any legal or business purpose, and in any event no later than one (1) year after the conclusion of the application process, unless a longer retention period is required or permitted by applicable law.

In the event that an employment relationship is established, we will cease to retain and erase your personal data in accordance with the DPDPA, once it is no longer necessary for employment, legal or business purposes following the end of the employment relationship, subject to any longer retention period required or permitted under applicable law, including employment, tax, social security and other statutory record-keeping requirements.

6. Applicant pool

In the event that you applied for a specific position and this has already been filled or we also consider you to be even more suited to another position or you have submitted an unsolicited application, we will forward your application further within our Group in order that you may be considered for future application processes. This applies only where you have elected to make your profile visible to every Jungheinrich recruiter worldwide.

7. Deletion of data / withdrawal of consent

Should you withdraw your application, we will cease processing and erase your personal data for the relevant purpose unless otherwise permitted or required by law. Your personal data will thereafter be deleted, anonymised or retained as required by law. You can delete your account at any time by your own. To do so, open your account and select "Settings via the "Options" menu item at the top right. Scroll down and then click the "Delete Profile" button.

If you wish to object to the collection, processing and use of your personal data within the scope of the consent given as part of the application process, please use the contact form [<https://www.jungheinrich.com.my/?fcid=551250555026>] or contact our data protection office using the contact details provided in Section 10 below.

8. Consent / data protection declaration

Data Protection declaration

By accepting our data protection declaration for our online application and onboarding process (by ticking the relevant checkbox or clicking the "I Agree" button), you acknowledge that you have read and understood this Data Protection Notice and you authorise the collection, use and disclosure of your personal data as described in this data protection declaration, including that you agree:

- to provision of your personal data to other overseas recipients as described above;
- to the handling of your personal data by other companies within the Jungheinrich Group for the purposes described above, including to provide centralised HR shared services on behalf of Jungheinrich India.

Consent

If you have chosen to make your profile visible only to recruiters who manage positions for which you wish to apply, you agree to the following:

- Only persons authorised by Jungheinrich may process my personal data in order to assess me as a suitable candidate for the position I am currently applying for, as described in the data protection declaration.

If you have decided to make your profile visible to every Jungheinrich recruiter worldwide, you agree to the following:

- Jungheinrich may share my personal data with other companies within the Jungheinrich Group in order to assess me as a suitable candidate for similar positions, now or in the future, as described in the data protection declaration.

You can change your privacy settings at any time or withdraw your consent to this processing at any time. Upon withdrawal of consent, we will cease processing your personal data for the relevant purpose. Unless retention is necessary for compliance with any applicable law, we will erase your personal data upon withdrawal of consent or when the specified purpose is no longer being served, whichever is earlier. Withdrawal of consent will not affect the legality of processing carried out before withdrawal.

9. Your rights as the data subject

Under the DPDPA, you have the right to:

- Obtain information regarding the processing of your personal data, including a summary of the personal data being processed and the purposes of such processing.
- Request correction, completion, updating and erasure of your personal data, subject to applicable legal and regulatory requirements.
- Withdraw your consent at any time. Such withdrawal will not affect the lawfulness of processing carried out before the withdrawal.
- Seek grievance redressal by contacting us through the designated grievance mechanism.
- Lodge a complaint with the Data Protection Board of India if you are not satisfied with the resolution of your grievance.
- Nominate another individual to exercise your rights under the DPDPA in the event of your death or incapacity.

10. Questions about data privacy

If you have any questions on the subject of data protection, you may contact:



Local Data Protection Officer

Email: indiadpo@jungheinrich.in

Address: A-404, 4th Floor, Delphi "A" Wing,
Central Avenue, Hiranandani Business Park,
Powai, Mumbai – 400076, Maharashtra

Group Data Protection Officer

E-mail: DPO@jungheinrich.com

(Group) Data Protection Officer

Friedrich-Ebert-Damm 129

22047 Hamburg

Germany.

Further information on data privacy at Jungheinrich can also be found on our homepage
<https://www.jungheinrich.in/data-privacy-546708>.