

# Partner in Pet Food CZ s.r.o.

## Data Protection Notice to Applicants

Latest update: 1 May 2024



## PARTNER IN PET FOOD CZ s.r.o.

### DATA PROTECTION NOTICE TO APPLICANTS

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#### 1. General provisions, contact details

**Partner in Pet Food CZ s.r.o.** (with its registered seat at Bucharova 1423/6, 158 00 Praha 13; Identification no: 241 67 819, registered in the Commercial Register maintained by the Municipal Court in Prague under file no. C 184849.; e-mail: [info@ppfeurope.com](mailto:info@ppfeurope.com); telephone number: +420 234 111 111) ("**Company**") is processing "*personal data*" (as defined in Article 4.1 of the General Data Protection Regulation 2016/679 of the EU - "**GDPR**") in connection with applicants ("**Applicants**") for jobs that are published on the website <http://www.ppfeurope.com> ("**Website**") or publicly advertised elsewhere and where applicant, as the case may be, apply for jobs by other means (electronically, by phone, personally or via post) even in the absence of any publicly announced posts. This data protection notice ("**Data Protection Notice**") provides the means and other details related to the processing of such personal data and the rights and remedies which the Applicants may have in connection with such data.

The Company reserves the right to unilaterally modify this Notice with subsequent effect, subject to the limitations provided for in the laws and with advance notification to the Applicants in due time, if necessary. The Company may modify this Notice especially when it is required upon changes in the laws, the practice of the data protection authority, business needs or employees' needs, any newly revealed security exposures or upon reflections of the Applicants.

#### 2. Job applications and the processing of the related personal data

By submitting his/her job application with all personal data included in it, the Applicant represents and warrants that (i) such data relate to his/her own personal data only, or (ii) he/she has obtained appropriate and informed consent or other adequate legal basis for disclosing the personal data (e.g. where he/she refers to one or more particular reference persons). In case the Company becomes aware that any personal data of a data subject was disclosed without his/her consent or any other appropriate legal basis, then the Company immediately deletes such personal data. The data subject is also entitled to exercise the rights and apply the remedies set forth in this Data Protection Notice. The Company will not bear liability for any loss, damage or harm which may be incurred in connection with a breach of the above representation and warranty made by the Applicant.

The Company may receive personal data also from external companies e.g. from labour agencies or headhunters. The terms and conditions of such external company will be applicable to the data processing carried out by such external companies and the Company does not exercise control in connection with this. Where the purpose of processing personal data is required for the enforcement of the legitimate interests of the Company or those of a third party, the Company shall upon a request submitted to the above contact details provide the balancing test used for establishing such legitimate interest. **The Company wishes to draw the attention of the Applicants to their right of objection to the processing of their personal data due to a cause related to their own situation any time where the processing is based on legitimate interest including the case where the processing takes the form of profiling. In such a case, the Company ceases processing the personal data unless it can prove that the processing has to be continued due to compelling legitimate reasons which override the interests, rights and freedoms of the Applicants or which relate to the submission, the enforcement or the protection of legal claims.**

The Company provides the information in connection with the job applications and the processing of personal data that are included in them as set out below. Where this Notice refers to the time period stipulated in the statute of limitations as the time period while personal data are stored, any act or circumstance which causes a break in the

time period so stipulated will cause an extension of the storage period concerned until the new date when the claim concerned becomes time-barred.

Description and purpose of data processing	Legal basis of the data processing	Scope of processed data	Duration and recipients of the personal data processing
<p><b>Processing the personal data of Applicants for the purpose of filling the posts announced by the Company and selected by the Applicants (recruitment), and documenting the selection process.</b></p>	<p>Article 6.1) (b) of the GDPR (pre-employment processing is necessary for the purpose of meeting the requirements of the future employee and subsequently for the purpose of fulfilling the employment contract).</p> <p>The Act 262/2006 Coll., as amended, the Labour Code and Act 435/2004 Coll., as amended on Employment also serve as legal basis for processing of personal data of Applicants. The data and the forms which are material from the aspect of establishing the labour relation can be requested from the employee even prior to the establishment of the employment.</p> <p>If the Applicant has been proposed to the Company by a labour agency and in case of his/hers successful selection, the Company notifies the labour agency about the acceptance and the initial terms of compensation of the Applicant according to the terms and conditions of data processing of the agency. The purpose is the calculation of the commission payable for the successful recruitment to the agency. The legal basis of the data transfer is Article 6.1 f) of the GDPR (the legitimate interest of the Company and the agency).</p>	<p>The name and contact details (address, telephone number, e-mail address, and, as the case may be, the LinkedIn or other social media profile contacts, the address of a professional website) of the Applicants, the content of the CV and motivation letter, profile photo attached to the CV, knowledge of foreign languages, information related to previous work experience, place(s) of work, qualifications, skills and education, preferred professional area, references and, where available, expected salary figure. The CVs and applications may include personal data given voluntarily such as the place and date of birth, citizenship.</p> <p>The Company may receive such data directly from the Applicant or via third parties (e.g. labour agencies). In the latter case, the terms and conditions of data processing determined by such third party shall also apply to the data processing.</p> <p>The Company prepares internal reports and notes in connection with applications regarding the assessment and the aspects of its assessment.</p> <p>In addition, the Applicant may disclose the names, positions and contact details</p>	<p>The data are stored for <b>3 years</b> in accordance with the Act no. 89/2012, the Civil Code ("Civil Code") in case of a claim possibly asserted by way of judicial or governmental proceedings against the Company in connection with the job application. This is the time period during which the Applicant may assert a claim in connection with the recruitment process e.g. on the grounds of discrimination and the Company may, in the interest of the assessment of future job applications, keep internal records during the above-referred time period about persons who previously applied for certain jobs offered by the Company. This changes the initial legal basis of the data processing to Article 6.1 (f) of the GDPR. The data processing will be required for the enforcement of a claim of the Company: participation in one or more proceedings related to the enforcement of the claim and presentation of the defence of the Company.</p> <p>In case the Applicant withdraws his/her application before the decision on the selection through one of the contact channels of the Company, then the Company deletes the data of the Applicant. The Company deems the</p>

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		<p>of reference persons who relate to his/her current or previous jobs where such persons (his/her former superiors or colleagues, in most cases) can provide substantive information about the professional skills and experience of the Applicant. In case the Company seeks contact with the reference persons so identified, the information sought from such persons can exclusively be such data which concern the professional skills and experience of the Applicant that may be relevant in relation to the particular job that is applied for i.e. the Company may not record any other kinds of data.</p>	<p>withdrawal of the application as a waiver by the Applicant of any claims in connection with the application.</p> <p>Within the organisation of the Company, the competent person of the area that is affected by the job application and the HR Department have access to the application and the personal data of the Applicant. The Company stores all job applications and the personal data included in them on a server and mailbox system (mailbox system account) to which the HR Department has exclusive access.</p>
<p><b>Evaluation of the assessment of the Applicant for the announced job (data processing in connection with the assessment and tests) after the review of the job applications – in accordance with the specifics of the job which is applied for.</b></p> <p>Professional assessment tests and their assessment occur exclusively in such cases where the Company has so decided in advance - if needed for filling particular posts, and the Company notifies the Applicants thereof in advance.</p>	<p>Article 6.1 (f) of the GDPR (the legitimate interest of the Company). The legitimate interest: carrying out the manufacturing activities of the Company at high standards, compliance with the applicable laws and evaluating professional competences in the light of the aforesaid.</p>	<p>CV of the Applicants and information contained therein, in particular their name and contact details (address, telephone number, e-mail address), questions about professional history and experience, results of professional and language tests, and with regards managerial positions also the psychodiagnostic test.</p>	<p>The Company stores the findings of the assessment for a duration of the recruitment process and for 2 weeks after the recruitment process was closed or the application is reviewed. In the interest of assessing future applications, it is justifiable for the Company to keep internal records during this period about persons who have previously applied for a job in the Company.</p> <p>In case there is a risk of a claim or judicial or government proceeding which the Applicant may initiate against the Company in connection with the job application, the Company stores the findings of the assessment</p>

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			<p>for 3 years period starting with the date when the recruitment process was closed or the application is reviewed.</p> <p>The examination is carried out by a professional member of the Company's own personnel who shall observe confidentiality.</p>
<p><b>Keeping CVs or other documents related to job applications (e.g. motivation letters) of Applicants in order to make it possible that the Company could contact the Applicant later with an offered job directly (e.g. when a job becomes vacant).</b></p>	<p>Article 6.1 (a) of the GDPR (voluntary consent).</p> <p>The Company may wish to store the documents of job applications even after the closing of a recruitment process or in the absence of a job vacancy and seek the consent of the Applicant to this with the purpose of making a future offer (e.g. when there is no vacancy in the particular area related to the application of an Applicant but there may be one later).</p> <p>The Applicant may withdraw his/her consent any time. Such withdrawal will not affect the legitimacy of the data processing carried out on the consent granted prior to the withdrawal.</p> <p>The consent is voluntary; however, the Company cannot directly address the given Applicant with a job offer in the future in the absence of the consent.</p>	<p>The scope of the data which the Applicant shared with the Company initially.</p>	<p>Until the consent of the Applicant is withdrawn, or in the absence of the aforesaid, for <b>3 years</b> following the submission of the job application to the Company. In the opinion of the Company, this is time period while the data required to fulfil the purpose of the data processing remain accurate and up-to-date. For example, the actual experience of a particular Applicant may not be sufficient for the job as at the date of the application but the same Applicant may become suitable later to fill a future post or, as another example, where the applied job becomes vacant again.</p> <p>Within the organisation of the Company, the competent person of the area that is affected by the job application and the HR Department have access to the application and the personal data of the Applicant. The Company stores all job applications and the personal data included in them on a server and mailbox system (mail</p>

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			system account) to which the HR Department has exclusive access.
<p><b>Processing personal data in relation to travelling arrangements and booking accommodation for the Applicant.</b> This may be needed in case e.g. the interview with the applicant takes place in another country and the Company arranges the trip and the booking of accommodation for the Applicant upon advance discussion with him/her.</p>	<p>Article 6.1 (f) of the GDPR (the legitimate interest of the Company).</p> <p>The legitimate interest: facilitating the arrangements of the interview more efficiently so procuring e.g. that the Applicant can be interviewed in a hotel which is easier to reach either for the Applicant or for a participant of the recruitment process acting on the side of the Company; or the Applicant can be interviewed directly at the location where the job is supposed to be carried out (that way, also the Applicant can have more definite information about his/her future job and colleagues), and releasing the Applicant from (part of) his/her administrative burden.</p>	<p>The personal data of the Applicant related to the travel and booking of accommodation including the Applicant's name, the dates and time of the discussions, those of the interview, the arrival and departure, the type of the trip and the vehicle used (e.g. airplane or international railway, etc.) the details of the booked room and the data of the services related to the provision of accommodation and the data of certain special requests related to the travel and/or the accommodation, if applicable (e.g. first class air ticket, choice of special breakfast menu at the hotel, etc.).</p>	<p>In case there is a risk of a claim or judicial or government proceeding which the Applicant may initiate against the Company in connection with the job application, the Company stores the findings of the assessment for 3 years period starting with the date when the recruitment process was closed or the application is reviewed.</p> <p>In connection with the costs incurred by the Company in relation to the arrangement of the travelling and accommodation, the Company is obliged to keep the data required for fulfilling its tax liabilities for <b>3 years</b> of the day the tax return is due or the day the tax became due and payable pursuant to the Act No. 280/2009 Coll., Tax Code.</p> <p>In addition, insofar as the Company is obliged to store the data for fulfilling its accountancy obligations pursuant to the Act No. 563/1991 Coll., Accounting Act, then such data will be deleted after <b>5 years</b>.</p>



### **3. Data transfer to other data controllers**

The Company may share personal data within its group of companies listed below. The recipients of the data transfers act as independent data controllers. This means that they may determine the purpose of data processing independently or jointly with others (including the Company as the case may be), make decisions and implement them, or have them implemented by a data processor engaged for that purpose, regarding data processing (including the instrument to be used).

The legal basis for data transfer within the group of companies is Article 6.1 (f) of the GDPR (the legitimate interest of the Company).

The legitimate interest: unifying and enhancing the group-level recruitment tasks of the Company and the group members. For example: the employment of a new IT team member by PPF Poland is carried out with the involvement of the IT Department and the HR Department of the PPF company in Hungary. The new team member in Poland will also work together with his/her colleagues located in Hungary and, therefore, it is also the legitimate interest of the company in Hungary that it could evaluate the assessment of the new team member. The affected PPF group company processes the data in the job application in accordance with its own Data Protection Notice covering the processing of personal data and in accordance with its own national laws.

The scope of recipients includes the following:

**Partner in Pet Food Poland S.A.**

ul. Szamocka 8, Warsaw 01-748, Poland  
telephone No: +48 22 569 24 10,  
[info.pl@ppfeurope.com](mailto:info.pl@ppfeurope.com).

**Partner in Pet Food Hungária Kft.**

H-1112 Budapest, Boldizsár utca 4.  
telephone: +36 1 801 02 03  
[info@ppfeurope.com](mailto:info@ppfeurope.com)

**Partner in Pet Food CZ s.r.o.**

Bucharova 1423/6 158 00 Prague 13 - Nové Butovice, Czech Republic  
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[info@ppfeurope.com](mailto:info@ppfeurope.com)

**Partner in Pet Food SK s.r.o.**

Kračanská cesta 40, 929 01 Dunajská Streda, Slovakia  
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**Partner in Pet Food NL B.V.**

Wijchenseweg 132 6538 SX Nijmegen, Holland  
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**Doggy AB**

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**Bozita GmbH**

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**Landini Giuntini S.p.A.**

via Rosa Luxemburg n.30,



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Phone: +39 075 851781  
Fax.: +39 075 8517804  
[info@landinigiuntini.it](mailto:info@landinigiuntini.it)

**Partner in Pet Food France SAS**

2 bis Rue de la Tête d’Or,  
Lyon 69006,  
Phone: +33 6 40 86 34 08

**Kollmax Kft.**

7622 Pécs, Nyírfa utca 24/6.  
Phone:+36 72 998 282, E-mail: [info@kollmax.eu](mailto:info@kollmax.eu)

In addition, personal data are transferred to accommodation and travel service provider partners of the Company. The purpose is arranging travels and accommodations of Applicants to locations where recruitment interviews and the selection process takes place. Such partners act as independent data controllers who follow their own data processing policies. The legal basis of the data transfer is article 6 (1) f) of the GDPR (i.e. the legitimate interest of the Company as elaborated in the relevant line under point 2 above).

**4. Data protection rights and remedies of Applicants**

**4.1 Rights and remedies**

The detailed rights and remedies of the individuals, including the Applicants and the persons referred to in point 2 herein (e.g. person who submit a job application on behalf of somebody else), are set forth in the applicable provisions of the GDPR (especially in articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80, and 82 of the GDPR). The summary set out below describes the most important provisions and the Company provides information for Applicants and other affected persons in accordance with the above articles about their rights and remedies related to the processing of personal data.

The Company will respond without unreasonable delay and by no means later than within one month of receipt to the request of an individual whereby such person exercises his/her rights about the measures taken upon such request (see articles 15-22 of the GDPR). This period may be, if needed, extended by further two months in the light of the complexity of the request and the number of requests to be processed. The Company notifies the individual about the extension also indicating its grounds within one month of the receipt of the request. Where the request has been submitted by electronic means, the response should likewise be sent electronically unless the individual otherwise requests.

In case the Company does not take any measure upon the request, it shall so notify the individual without delay but by no means later than in one month stating why no measures are taken and about the opportunity of the individual to lodge a complaint with the data protection authority and to file an action with the courts for remedy.

**4.2 The data subject’s right of access**

The affected person has the right to obtain confirmation from the Company whether or not personal data concerning him/her are being processed. Where the case is such, then he/she is entitled to have access to the personal data concerned. The Company provides a copy of the personal data undergoing processing to the data subject. The Company may charge a reasonable fee based on administrative costs for requested further copies. Where the affected person submitted his/her request in electronic form, the response will be provided to him/her by widely used electronic means unless otherwise requested by the data subject.

**4.3 Right to rectification**

The data subject has the right to request that the Company rectify inaccurate personal data which concern him/her without undue delay. In addition, the data subject is also entitled to have incomplete personal data completed e.g. by a supplementary statement or otherwise.

**4.4 Right to erasure ('right to be forgotten')** The affected person has the right that when he/she so requests, the Company erase the personal data concerning him/her without delay.

**4.5 Right to restriction of processing** The affected person has the right to obtain a restriction of processing from the Company.

**4.6 Notification obligation regarding rectification or erasure of personal data or restriction of processing**

The Company will communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Company informs the affected person about those recipients if he/she so requests.

**4.7 Right to data portability** The individual has the right to receive the personal data concerning him/her, which he/she has provided to the Company in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company.

**4.8 Right to object**

The affected person has the right to object, on grounds relating to his/her particular situation, at any time to processing of personal data concerning him/her for the purposes of legitimate interests. The Company will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing.

**4.9 Right to lodge a complaint with a supervisory authority**

The affected person has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place of the alleged infringement if he/she considers that the processing of personal data relating to him/her infringes the GDPR. In the Czech Republic, the competent supervisory authority is The Office for Personal Data Protection (in Czech: *Úřad pro ochranu osobních údajů*) - [www.uoou.cz/](http://www.uoou.cz/); Pplk. Sochora 27, 170 00 Praha 7, Czech Republic; telephone: + 420 234 665 111; e-mail: [posta@uoou.cz](mailto:posta@uoou.cz).

**4.10 Right to an effective judicial remedy against a supervisory authority**

The affected person has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him/her.

**4.11 Right to an effective judicial remedy against the Company or the processor**

The affected person, without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, has the right to an effective judicial remedy.