

Vantage Towers Privacy Notice for Job Applicants

in accordance with Art. 13, 14 GDPR & Section 8 of Act No. 110/2019 Coll. on Data Processing

Date: 28.05.2025

This privacy notice applies when you apply for a specific role at Vantage Towers s.r.o. (hereafter "Vantage Towers") or you register a general interest in pursuing a career with us.

1. Data Controller – who is responsible for data processing

Vantage Towers s.r.o.

Address: Závěšova 502/5, 140 00 Praha 4 - Nusle

2. Contact our Group Data Protection Officer

Vantage Towers AG – with the addition "To the data protection officer" –

Address: Prinzenallee 11-13, 40549 Düsseldorf, Germany

email: privacy@vantagetowers.com

3. Personal Data which we process

In relation to your application, we process the following personal data in particular:

- Personal details and contact information, such as first name and family name, personal email address, current address, telephone number;
- Recruitment information, such as application form (website and paper), CV including a photo, resumes, interview notes of successful candidates, interview notes of unsuccessful candidates, video interviews, references from previous employer, psychometric test results;
- Internal candidate information, such as references given by Vantage Towers, interview notes, internal transfer or promotion, succession planning documents;
- Identification information, such as proof of identity;
- Authentication information, such as user name and password for the recruitment portal;
- Information collected through Cookies;
- We may also process sensitive personal information pursuant to Art. 9 I and 10 GDPR about you – but only where this is strictly necessary to assess your suitability for the role you have applied for. For example,
 - We may collect records of criminal convictions or right to work in the country you are applying to in order to perform security background checks where it is required by local law;

- We may collect information such as gender, nationality or personal Data on health to evaluate who applies for roles at Vantage Towers in order to meet our targets for diversity and inclusion – but only where you provide this information voluntarily and provide consent for us to process this information.

4. Purpose and legal basis for processing your personal Data

We process your personal data for the following purposes:

- Recruiting people into jobs, the information you provide to us will be processed in order to assess and progress your job application, to make a decision about your suitability for the role and contact you throughout the recruitment and onboarding process and to make any verifications required by local law. If you apply for more than one vacancy, your information will be shared with each Vantage Towers company where you have applied;
- Resourcing for jobs, if you explicitly register a general interest in pursuing a career with Vantage Towers companies, the information that you provide will be retained by us and searched by people who are employed by Vantage Towers to help us fill future vacancies. If you apply for a specific vacancy and you are unsuccessful, the information you provide to us will be retained so that we can consider you for future suitable vacancies – but only where we have collected your consent to do so;
- Creating an employee record, if your job application is successful, the information you give during the application process will form part of your employee record and will be used to administer your employment and manage your career at the respective Vantage Towers company;
- Analytics, we may use some of the personal information you provide for various reporting purposes including, for example, to report on our diversity targets or the type of candidates and volumes of applications made to Vantage Towers and related trends – you will not be personally identified from these reports;
- Screening, in certain circumstances we will make an automatic decision on the suitability of your application based on certain criteria. For example, graduates must be proficient in English and have completed a university degree to be considered for a role at Vantage Towers – we will bring this to your attention separately wherever we process information to make an automatic decision about you;
- Cookies, we use cookies to understand how you use the recruitment website.

Processing your personal data as set out in Clause 3 above is necessary for the achieving the purposes laid out in this Clause, in particular for establishing an employment relationship. If you provide consent for us to process your personal Data in the aforementioned cases, the legal basis is Art. 6 par. 1 lit. b) GDPR or, with regard to the processing of sensitive personal information, Art. 9 par. 2 lit. b) GDPR.

As described above some of the information we process about you is required to make an assessment on your application to Vantage Towers and contact you as you progress through the recruitment process, for example your telephone number, email address, CV. If you do not provide this information then we will be unable to make an assessment of your application or contact you to invite you to interview or make you an offer.

5. Sources of the personal Data

We may collect information about you from recruitment agencies or from the public internet where you have made this information publicly available, for example, we may find your profile on LinkedIn and contact you about suitable roles.

6. Storage period for personal Data

Your personal Data will be stored as long as it is necessary for the recruitment process. If you are successful, we will keep your information for the duration of your employment. If we are not able to offer you a role, we may keep your information for up to 6 months, inter alia to contact you about future roles that may interest you, but only where we have collected your consent to do so.

Subsequently, your data processed in relation to the application will be deleted or anonymised, unless legal retention obligations or other reasons prevent deletion.

We will anonymise your information in accordance with our retention policy and may retain those anonymised records to monitor the effectiveness of our recruitment process. For example, we may create reports to understand what nationalities have applied for roles with Vantage Towers in the last 12 months – you will not be identifiable in these reports and you can withdraw your consent at any time by updating the information.

7. Data subject rights

As a data subject, you have the following rights in accordance with Art. 12 et seq. GDPR:

- request information as to your personal data we process (Art. 15 GDPR);
- request to rectify any inaccurate personal data or supplement any uncompleted personal data (Art. 16 GDPR). If the information we keep about you needs updating, or you think it may be inaccurate, you can update your information;
- subject to fulfilling the legal requirements, request erasure or restriction of processing of your personal Data as well as invoke the right to data portability (Art. 17, 18 und 20 GDPR).
- If we process your personal Data based on your consent, you have the right to withdraw this consent at any time with effect for the future. The withdrawal of consent does not affect the lawfulness of processing based on consent before your withdrawal.

If we process your personal Data for the purposes of our legitimate interests (Art. 6 par. 1 lit. f) GDPR), you have the right to object to processing. If you claim your right to object, we will no longer process your personal Data, unless we demonstrate compelling legitimate grounds

for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

If you claim any of your data subject rights, we will analyse whether the legal preconditions are met. Please address any request to our Group Data Protection Officer. Their contact details are available under section 2. In addition, you have a right to lodge a complaint with a supervisory authority (Art. 77 GDPR).

8. Recipients or categories of recipients

We will transfer your personal Data to the following categories of recipients, if necessary for the purposes laid out in Clause 4, being:

- Companies within the Vantage Towers Group;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
- Third parties outside these Group who are involved as service providers/Data processors, such as Vodafone as the provider of the recruitment portal, recruitment agencies, test providers and others who help us fill vacancies and assess the suitability of candidates and progress applications.

We have concluded a data processing agreement with these service providers in accordance with Art. 28 III GDPR. On this basis we ensure that they meet the same privacy and security standards as Vantage Towers. We remain the controller for processing of the personal Data.

Eventually we will transmit personal Data to countries outside the European Economic Area ("third countries"), which do not provide for the same data protection level. Unless there is an adequacy decision – pursuant to Art. 45 GDPR – by which the European Commission determines an adequate level of protection in the respective third country, we have taken measures to ensure adequate and appropriate safeguards for the protection of your personal data. These include so-called EU standard contractual clauses that have been concluded with recipients of the personal data and that provide for appropriate safeguards, Art. 46 GDPR. If a transfer to companies belonging to the group is necessary for the execution of the Contract, this is secured by corresponding reciprocal agreements.