

Privacy Policy for applicants

Brenntag respects the protection of your personal data. We would therefore like to inform you how your data will be processed and stored in the context of the application process.

The personal data provided to us within the scope of your application will be treated confidentially by us and commissioned service providers. The Brenntag company to which you are applying, processes your personal data in accordance with the applicable data protection regulations. In sections 1 to 10 you will find the information in accordance with the requirements of the General Data Protection Regulation (EU) 2016/679 (GDPR).

Insofar as special or complementary regulations apply in individual countries, you will find them in Section 11.

Personal data is also processed when you visit this website. Further information on data processing in the context of the usage of this website can be found [here](#).

1. Who is responsible for the data processing and whom can you contact?

Responsible for the processing of your personal data is the respective company of the Brenntag group you apply for.

The headquarters of the Brenntag group is located at the following address:

Brenntag AG

Messeallee 11

45131 Essen

Group Data Protection Officer:

Messeallee 11

45131 Essen

gdpo@brenntag.de

2. Which data are processed and from which sources do they originate?

We process your personal data provided to us as part of the application process, which we receive from you or from third parties. This includes the data you provide in the application form as well as personal information contained in cover letters and any other documents you provide, such as Curriculum Vitae or certificates. The mandatory fields on the application form include, amongst others, your contact details. We need this information in order to be able to contact you during the application process.

In addition, we process personal data from publicly accessible sources (e.g. professional networks), as far as they are relevant for the application process.

3. For what purposes will the data be processed and on what legal basis will it be processed?

Processing is carried out for the purpose of processing a proper application procedure.

If there are no special regulations in the EU member state concerned, the legal basis is the implementation of pre-contractual measures pursuant to Art. 6 (1) lit. b GDPR.

If EU member states provide additional regulations, then the legal basis is Art. 88 GDPR in conjunction with the respective provision in the national law concerning processing personal data in the context of employment or the establishment of employment.

Further processing which is not directly related to the specific pre-contractual relationship (the establishment of the employment relationship) is carried out based on our legitimate interests pursuant to Art. 6 (1) lit. f GDPR. This concerns decisions as to how we best plan our personnel resources and which personnel we employ as well as the establishment, perception or defence of legal claims.

If you have confirmed with the corresponding checkbox that we may store and process your data for future advertisements beyond the current job advertisement, the storage and processing of the data is based on your consent pursuant to Art. 6 (1) lit. a GDPR. You can withdraw your consent at any time with effect for the future. This has no influence on the lawfulness of the processing due to your consent before the withdrawal.

As part of our application process, we do not request any special categories of personal data within the meaning of Art. 9 GDPR. If you nevertheless send us such data, we will process this data in accordance with Art. 9 (2) lit. a GDPR based on your consent.

4. Who receives your data?

After entering and transmitting your data, it is transferred directly to the secure server of our external service provider via an encrypted connection. All data is encrypted during transmission based on the SSL procedure.

The Brenntag company named in the job advertisement as well as the Group companies to be included will have access to your data to the extent necessary for the respective position.

At the same time as the responsible HR department, the responsible manager receives access to your application. In the event of a negative decision by the manager, this access is again blocked and only the responsible HR department still has access to your data.

We use external service providers to carry out and improve the application process. The respective service providers receive from us only such personal data which are necessary for the service. Our service providers have given appropriate guarantees that they will take appropriate technical and organizational measures to carry out the processing in accordance with the applicable data protection law. The processing of personal data by commissioned service providers will be

contractually regulated and is carried out exclusively on the basis of our instructions.

In addition, Brenntag is obliged to pass on your data in order to answer legally admissible enquiries from state authorities to the extent required by law.

5. Data transfer to countries outside of the EU

Within the framework of processing your personal data for the above-mentioned purposes, it may be necessary that the data will be transferred in countries outside the EU. If we transfer personal data to service providers or Brenntag group companies outside the EU, the transfer takes place in accordance with the applicable statutory provisions with appropriate safeguards. This is the case if the third country has been confirmed by the EU Commission to have an adequate level of data protection or if other appropriate data protection guarantees (e.g. binding corporate rules or EU standard contractual clauses) are in place.

In the case of Brexit without a withdrawal agreement, this section also applies to data transfers to the United Kingdom.

6. Automated decision making and profiling

Unless we expressly point this out or otherwise agreed, we do not use automated decision-making pursuant to Art. 22 GDPR in the application process at Brenntag.

7. Duration of storage

In principle, your data will be stored and processed during the application process for as long as is necessary for the application. If the evaluation is positive, the data will be further processed in the personnel department. In the event of a negative evaluation by the decision-maker, your data will be stored for a further six months after rejection in order to comply with legal requirements, and then deleted unless otherwise agreed with you.

If you have confirmed the corresponding checkbox, we will save your data beyond the current job advertisement for future advertisements. In this case, we will retain the data for up to two years before we delete it.

8. Cookies

Cookies are used on this website. Further information on cookies can be found [here](#). You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website.

This website also uses Recruitment Analytics, a web analytics service provided by VONQ GmbH, Georg-Glock-Straße 8, 40474 Düsseldorf, Germany ("VONQ"). VONQ uses cookies which enable us to gain insight into our personnel marketing activities. A tracking solution is used which records the IP address of the website visitor. VONQ stores the IP address for 30 days and pseudonymises the data. By processing this data, we pursue our legitimate interest pursuant to Art. 6 Para. 1 lit. f GDPR in order to analyse and improve our website, navigation and recruitment. Further information on VONQ and data protection can be found at <https://www.vonq.com/privacy-policy/>.

9. References to the rights of data subjects

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed; if this is the case, he or she shall have the right of access to such personal data and to the information specified in Art. 15 GDPR.

The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her and, if necessary, to complete incomplete personal data (Art. 16 GDPR).

The data subject has the right to obtain from the controller the erasure of personal data concerning him or her immediately if one of the reasons specified in Art. 17 GDPR applies, e.g. if the data is no longer required for the purposes pursued (right to erasure).

The data subject has the right to obtain from the controller restriction of processing if one of the conditions listed in Art. 18 GDPR is met, e.g. if the data subject has lodged an objection to the processing, for the duration of the controller's examination.

In addition, the data subject has the right to data portability pursuant to Art. 20 GDPR.

Right to object

The data subject shall have the right to object, on grounds relating to own individual situation, at any time to processing of own personal data. The controller will then no longer process the personal data unless compelling legitimate grounds for the processing are demonstrated which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims (Art. 21 GDPR).

If you have given us your consent for data processing, you have the right to withdraw your consent at any time with effect for the future. This has no influence on the lawfulness of the processing due to your consent before the withdrawal.

10. Competent authority

Notwithstanding other administrative or legal means, any data subject has the right to lodge a complaint with the competent supervisory authority.

The leading supervisory authority for the Brenntag Group is:

Die Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen

Postfach 20 04 44

Kavalleriestraße 2-4

40213 Düsseldorf

www.ldi.nrw.de

11. Specific and complementary provisions of the countries of the EMEA region

The following overview shows the specific and, if applicable, supplementary regulations of the countries:

Country (Location of the respective Brenntag company)	National regulations
Algérie / Algeria	<p>Au 3. La base légale de la procédure de traitement des données des candidats en Algérie est la loi n° 18-07 10 juin 2018 relative à la protection des personnes physiques dans le traitement des données à caractère personnel To 3. The legal basis for the proceeding of applicant data in Algeria is Law No. 18-07 of 10 June 2018 on the protection of individuals in the processing of personal data</p>
België / Belgium	<p>Op 7. Ingeval van een negatieve beoordeling door de beslissingsbevoegde worden uw gegevens gedurende drie maanden na afwijzing opgeslagen, ten einde te voldoen aan wettelijke voorschriften, en worden ze daarna gewist, tenzij er met u iets anders is overeengekomen. Als u het betreffende selectievakje heeft bevestigd, bewaren we uw gegevens buiten de huidige vacature voor toekomstige advertenties. In dit geval bewaren we de gegevens maximaal een jaar voordat we ze verwijderen.</p> <p>Art. 7. En principe, vos données seront conservées et traitées au cours du processus de candidature aussi longtemps qu'il durera. Si l'évaluation est positive, les données seront traitées ultérieurement par le service du personnel. En cas d'évaluation négative de la part du décideur, vos données seront conservées pendant trois mois supplémentaires après le rejet afin de respecter les exigences juridiques, puis supprimées, sauf s'il en a été convenu autrement avec vous.</p> <p>Si vous avez coché la case correspondante, nous enregistrons vos données au-delà de</p>

	<p>l'offre d'emploi actuelle pour les futures annonces. Dans ce cas, nous conserverons les données pendant un an au maximum avant de les supprimer</p> <p>To 7.</p> <p>In the event of a negative evaluation by the decision-maker, your data will be stored for a further three months after rejection in order to comply with legal requirements, and then deleted unless otherwise agreed with you. If you have confirmed the corresponding checkbox, we will save your data beyond the current job advertisement for future advertisements. In this case, we will retain the data for up to one year before we delete it.</p>
<p>България/ Bulgaria</p>	<p>Точка 1.</p> <p>Длъжностно лице по защита на данните в България:</p> <p>dpo@brenntag.bg</p> <p>София, бул. Ситняково 48</p> <p>Офиси Сердика ет.10</p> <p>To 1.</p> <p>DPO in Bulgaria</p> <p>dpo@brenntag.bg</p> <p>Sofia bul Sitnyakovo 48</p> <p>Serdika Offices 10 floor</p>
<p>Danmark / Denmark</p>	<p>Til 3.</p> <p>Retsgrundlaget i Danmark er Lov nr. 502 af 23. maj 2018, da den omhandler etableringen af et ansættelsesforhold.</p> <p>To 3.</p> <p>The basis for this regulation in Denmark is Act no. 502 of 23 May 2018, since it is a question of establishing an employment relationship.</p>
<p>Deutschland / Germany</p>	<p>Zu 3.</p> <p>In Deutschland ist der § 26 BDSG - Datenverarbeitung für Zwecke des Beschäftigungsverhältnisses - die Rechtsgrundlage für die Verarbeitung der Bewerberdaten.</p> <p>To 3.</p> <p>The legal basis for the processing of applicant data in Germany is § 26 BDSG, since it is about the question of the establishment</p>

España / Spain	<p>A 3.</p> <p>La base jurídica en España es el Reglamento General de Protección de Datos (Reglamento (EU) 2016/679) (GDPR) y la Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos de Carácter Personal y Garantía de los Derechos Digitales, ya que se trata de establecer una relación laboral.</p> <p>To 3.</p> <p>The legal basis in Spain is the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) and the Organic Law 3/2018 of December 5, Protection of Personal Data and Guarantee of Digital Rights, since it is a question of establishing an employment relationship.</p>
France / France	<p>Art. 1.</p> <p>Le siège social de Brenntag SA est situé à l'adresse suivante :</p> <p>Brenntag SA 90 avenue du Progrès 69680 Chassieu</p> <p>Le délégué à la protection des données :</p> <p>90 avenue du Progrès 69680 Chassieu dpo@brenntag.de</p> <p>To 1.</p> <p>The head office of Brenntag SA is located :</p> <p>Brenntag SA 90 avenue du Progrès 69680 Chassieu</p> <p>The data protection officer :</p> <p>90 avenue du Progrès 69680 Chassieu dpo@brenntag.de</p> <p>Art 2.</p> <p>Vous pouvez vous opposer à ce traitement par demande écrite au délégué à la protection des données.</p> <p>To 2.</p> <p>You have the right to object to this processing by written request to the Data Protection Officer.</p> <p>Art 3.</p> <p>Si vous nous envoyez des données sensibles au sens de l'article 9 du RGPD, nous ne les traiterons pas.</p>

	<p>To 3. If you send us sensitive data within the meaning of Article 9 of the GDPR, we will not process them.</p> <p>Art 10. Vous pouvez contacter l'autorité française à cette adresse : 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07 FRANCE https://www.cnil.fr/</p> <p>To 10. The contact details of the French Authority for the Protection of Personal Data are : 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07 FRANCE https://www.cnil.fr/</p>
Italia / Italy	<p>Oltre, al GDPR si applica il Codice Privacy come novellato dal D.Lgs 101/2018 Additionally to the GDPR, the Privacy Code as amended by Legislative Decree 101/2018 applies.</p> <p>Al 10. I dati di contatto dell'Autorità Garante per la protezione dei Dati Personali italiana sono: Garante per la Protezione dei Dati Personali, Piazza Venezia, n. 11 00187 - Roma https://www.garanteprivacy.it/</p> <p>To 10. The contact details of the Italian Authority for the Protection of Personal Data are: Garante per la Protezione dei Dati Personali, Piazza Venezia, n. 11 00187 - Roma https://www.garanteprivacy.it/</p>
Nederland / Netherlands	<p>Op 7. Ingeval van een negatieve beoordeling door de beslissingsbevoegde worden uw gegevens gedurende drie maanden na afwijzing opgeslagen, ten einde te voldoen aan wettelijke voorschriften, en worden ze daarna gewist, tenzij er met u iets anders is overeengekomen.</p>

	<p>Als u het betreffende selectievakje heeft bevestigd, bewaren we uw gegevens buiten de huidige vacature voor toekomstige advertenties. In dit geval bewaren we de gegevens maximaal een jaar voordat we ze verwijderen.</p> <p>To 7.</p> <p>In the event of a negative evaluation by the decision-maker, your data will be stored for a further three months after rejection in order to comply with legal requirements, and then deleted unless otherwise agreed with you. If you have confirmed the corresponding checkbox, we will save your data beyond the current job advertisement for future advertisements. In this case, we will retain the data for up to one year before we delete it</p>
Norge / Norway	<p>Til 3.</p> <p>Hjemmel for denne forskriften i Norge er lov 2018-06-15-15-38, siden det handler om å etablere et ansettelsesforhold.</p> <p>To 3.</p> <p>The basis for this regulation in Norway is Law 2018-06-15-15-38, since it is a question of establishing an employment relationship.</p>
Österreich / Austria	<p>Zu 7.</p> <p>Bei Ablehnung Ihrer Bewerbung für die konkrete Stelle durch den Entscheidungsträger werden Ihre Daten nach Absage für weitere sieben Monate gespeichert, um gesetzlichen Vorschriften zu entsprechen, und dann gelöscht.</p> <p>To 7.</p> <p>If your application for the specific position is rejected by the decision-maker, your data will be stored for a further seven months after rejection in order to comply with legal requirements.</p>
Portugal	<p>Para 3.</p> <p>O fundamento jurídico em Portugal é o Regulamento Geral sobre a Proteção de Dados (UE) 2016/679 (RGPD) e a Lei 67/98 de 26 de outubro (Lei da Proteção de Dados Pessoais), emendada pela Lei 103/2015 de 24 de agosto e promulgada de acordo com a Diretiva</p>

	<p>95/46/CE, uma vez que se trata da questão de estabelecimento de uma relação laboral.</p> <p>To 3.</p> <p>The legal basis in Portugal is the General Data Protection Regulation (EU) 2016/679 (GDPR) and Law 67/98 of 26 October (Personal Data Protection Act, amended by Law 103/2015 of 24 August and promulgated pursuant to Directive 95/46/EC, as this is the issue of establishing an employment relationship.</p>
Schweiz / Switzerland	<p>Zu 3.</p> <p>In der Schweiz ist der Art. 13 Abs. 2 DSG die Rechtsgrundlage für die Verarbeitung der Bewerberdaten.</p> <p>To 3.</p> <p>The legal basis in Switzerland Art. 13 Abs. 2 DSG, since it is about the question of the establishment of an employment relationship.</p> <p>Zu 9.</p> <p>Die betroffene Person hat das Recht, von dem Verantwortlichen eine Bestätigung darüber zu verlangen, ob sie betreffende personenbezogene Daten verarbeitet werden; ist dies der Fall, so hat sie ein Recht auf Auskunft über diese personenbezogenen Daten und auf die in Art. 15 GDPR und Art. 14 DSG im einzelnen aufgeführten Informationen.</p> <p>Die betroffene Person hat das Recht, von dem Verantwortlichen unverzüglich die Berichtigung sie betreffender unrichtiger personenbezogener Daten und ggf. die Vervollständigung unvollständiger personenbezogener Daten zu verlangen (Art. 15 DSG).</p> <p>To 9.</p> <p>The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed; if this is the case, he or she shall have the right of access to such personal data and to the information specified in Art. 15 GDPR and Art. 14 DSG.</p> <p>The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her and, if necessary, to</p>

	complete incomplete personal data (Art. 15 DSG).
Србија / Serbia	<p>Члан 3. Правна основа у Републици Србију: Закон о заштити података о личности (Службени гласник РС 87/2018) То 3. Legal basis in Republic of Serbia: Law about protection of personal data (Sluzbeni glasnik RS 87/2018)</p>
Slovakia	<p>Ods. 1 a 3 Zákon č. 18/2018 Z. z. Zákon o ochrane osobných údajov a o zmene a doplnení niektorých zákonov a Zákonník práce č. 311/2001 Section 1 and 3 The legal basis in Slovakia is the the Personal Data Act 18/2018 and Labour Code Act no. 311/2001</p>
South Africa	<p>Once it has fully commenced, the Protection of Personal Information Act, 2013 (POPIA) will be the applicable data privacy law in South Africa. Section 1. The Controller as defined in section 2 is referred to as the data controller under POPIA. Section 3. Once POPIA has commenced, section 11(1)(b) will be the legal basis for the processing of your personal information. Further processing which is not directly related to the specific pre-contractual relationship (the establishment of the employment relationship) is carried out based on our legitimate interests pursuant to section 11(1)(f) of POPIA. Section 5. If any of your personal information is transferred to a third party in a foreign country, such transfer is necessary for the implementation of pre-contractual measures taken in response to your application. Section 6. Pursuant to section 5(g) of POPIA, we do not use automated decision-making processes when processing your application.</p>

	<p>Section 7. In principle, your data will be stored and processed during the application process for as long as is necessary for the application. If the evaluation is positive, the data is forwarded to the personnel department. In the event of a negative evaluation by the decision-maker, your data will be stored for no longer than is necessary in order to comply with legal requirements, and then deleted unless otherwise agreed with you.</p> <p>Section 8. Under POPIA, you will have the right to: a) request from us, as the Controller (i.e. the responsible party) confirmation, free of charge, as to whether or not we hold information personal information about you, including the identify of all third parties or categories of third parties, who have or have had access to the information; b) request from us the correction or deletion of personal information about you, in our possession or under our control, that inaccurate, excessive, out of date, incomplete, misleading or obtained unlawfully; and c) request from us the destruction or deletion of personal information about you that we are no longer authorised to retain in terms of section 14 of POPIA.</p> <p>Section 10. The Competent Authority in South Africa is the Information Regulator. The Information Regulator's contact details are: 33 Hoofd Street Forum III, 3rd Floor Braampark Braamfontein, Johannesburg Inforeg@justice.gov.za</p>
Suomi / Finland	<p>Kotiaan 3. Oikeudellinen perusta Suomessa on Henkilötietolaki 1999/523, koska se käsittelee työsuhteen solmimiseen liittyviä kysymyksiä. To 3. The legal basis in Finland is the the Personal Data Act 1999/523 because it addresses questions concerning contractual employment relationship.</p>

Sverige / Sweden	<p>Till 3. Lagstiftning i Sverige: Lag (2018:218), eftersom det rör frågan om etablerandet av ett anställningsförhållande. To 3. Legal basis in Sweden: Law (2018:218) because it concerns the establishment of an employment relationship</p>
Türkiye / Turkey	<p>1. noktaya. Başvurunuz kapsamında bize sağlanan kişisel veriler, tarafımızca gizli tutulacak ve hizmet sağlayıcılar tarafından değerlendirilecek ve yerel olarak uygulanabilir veri koruma düzenlemesi olarak GDPR ve 6698 Türkiye Kişisel Verileri Koruma Kanunu (KVKK) ile uyumlu olarak işlenecektir. To 1. The personal data provided to us within the scope of your application will be treated confidentially by us, and will be evaluated by service providers and processed in compliance with the GDPR and 6698 Turkish Personal Data Protection Law (KVKK) as the locally applicable data protection regulation.</p>