



# ***DATA PROTECTION STATEMENT***

## **TABLE OF CONTENT**

### **I. Scope**

### **II. Definitions**

### **III. Data Controller**

### **IV. Situations, purposes and legal bases of Processing your Personal Data**

1. Career website visits [Log files / Cookies]
2. Registration on/Login to PUMA career website
3. Job application handling
4. Reference/Background checks
5. Works Council approvals
6. Candidate pool

### **V. Categories of Data Recipients**

### **VI. Storage periods**

1. Log files
2. Job application data

### **VII. Your data protection rights**

### **VIII. Data Protection Officer**

**Data Protection Statement – Mexico**

**Data Protection Statement – Argentina**

## DATA PROTECTION STATEMENT

### I. SCOPE

The following information relates to the Processing of Personal Data from job applicants (Data Subjects and hereinafter referred to as “you” / “your”) by PUMA SE and the all other companies of the PUMA group on our career website and in the context of the recruitment process.

### II. DEFINITIONS

For the purpose of this data protection information, the terms listed in this section II., when used in their capitalized form, shall have the meaning set forth below

“**GDPR**” means General Data Protection Regulation (Regulation [EU] 2016/679).

“**Personal Data**” means any information relating to an identified or identifiable natural person (“**Data Subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person [Art. 4 sec. 1 GDPR].

“**Processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction [Art. 4 sec. 7 GDPR].

“**Data Controller**” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law [Art. 4 sec. 7 GDPR].

“**Data Recipient**” means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing [see Art. 4 sec. 9 GDPR].

### III. DATA CONTROLLER

PUMA SE (PUMA Way 1, 91074 Herzogenaurach, Germany; career@puma.com) and the respective PUMA entity which advertised the job offer you are applying for (for contact details of this entity please refer to the respective job advertisement) are Data Controllers and hereinafter referred to as “**PUMA**”, “**we**” or “**our**”.

### IV. SITUATIONS, PURPOSES AND LEGAL BASES OF PROCESSING YOUR PERSONAL DATA

#### 1. CAREER WEBSITE VISITS (LOG FILES / COOKIES)

When you visit our career website, we are automatically Processing certain (Personal) Data like your internet protocol (IP) address, the type and version of browser you are using, your operating system and platform, including the uniform resource locator (URL) on our servers for security reasons (i.a. to fight cyber-attacks) [Legal base: Necessary Processing for our legitimate interests (fraud prevention / abuse handling), Art. 6 sec. 1 lit. f GDPR].

For our usage of cookies and similar technologies on our website please refer to our Cookie Policy.

#### 2. REGISTRATION ON / LOGIN TO PUMA CAREER WEBSITE

We are Processing your user name, password and email address when you register for and login to your user account on our career website [Legal base(s): Necessary Processing in order to take steps at the request of the Data Subject prior to entering into contract, Art. 6 sec. 1 lit. b GDPR / Necessary Processing for the purpose of recruitment, Art. 88 GDPR in conjunction with the respective member state regulation].

#### 3. JOB APPLICATION HANDLING

We are processing your Personal Data like your contact data (e.g. first and last name, address, phone number and email address) and the provided job application data (e.g. information on job and work history, education, language fluency and work permits) to handle your job application, which i.a. includes reviewing your job application, set up (telephone) screens and job interviews, deciding on a job offer, negotiating and preparing of an employment contract [Legal base(s): Necessary Processing in order to take steps at the request of the Data Subject prior to entering into contract, Art. 6 sec. 1 lit. b GDPR / Necessary Processing for the purpose of recruitment, Art. 88 GDPR in conjunction with the respective member state regulation].

#### 4. REFERENCE/BACKGROUND CHECKS

If necessary for verification of the provided information in your application, we may use your Personal Data to perform reference checks, e.g. by visiting your LinkedIn profile.

For the application to jobs in certain departments [e.g. IT and Finance] and/or in certain positions [e.g. retail supervisors and managers] we may also demand you to submit a criminal record; in US and Canadian PUMA companies also credit checks may be conducted with the help of external providers.

All these measures and corresponding Processings of your Personal Data are for the sole purpose of ensuring that there are no facts indicating that you are not suitable for the relevant job. [Legal base(s): Necessary Processing for our legitimate interests [i.e. verification of information / fraud prevention], Art. 6 sec. 1 lit. f GDPR].

#### 5. WORK COUNCIL APPROVALS

PUMA entities in Germany are also Processing Personal Data, like e.g. your nationality, date of birth, disability status to gather the required works council's approval of the planned employment [Legal base: Necessary Processing for compliance with legal obligation, Art. 6 sec. 1 lit. c GDPR in conjunction with § 99 BetrVG].

#### 6. CANDIDATE POOL

If you have given your prior consent, we keep your personal data in our candidate pool and may inform you about other potentially suitable job advertisements, even if the application for the specific position for which the data were originally collected was unsuccessful. Your consent can be withdrawn at any time via email to [careers@puma.com](mailto:careers@puma.com). The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal [Legal base: Processing based on consent, Art. 6 sec. 1 lit. a GDPR]

#### 7. CATEGORIES OF DATA RECIPIENTS

Your personal data is disclosed to the respective Puma entity/entities and its/their responsible representative[s] [including, if applicable, the works council's representatives] for the recruitment process of the respective job advertisement you apply to. Due to the Puma group internal organization your Personal Data might also be transferred to or disclosed to Puma entities other than the Data Controllers mentioned in section [Legal base: Necessary Processing for our legitimate interests [i.e. PUMA group internal administration], Art. 6 sec. 1 lit. f GDPR.]

If you consented to be included in our talent pool [see section IV. 6. above] your provided Personal Data is disclosed to all Puma entities.

Your Personal Data is also disclosed to external service providers which provide the tools and platforms used in our recruitment process and which process your Personal Data on our behalf as Data Processors.

For background checks described under section IV. 4. Personal Data might also be transferred to the entities involved in performing the background checks [e.g. credit agencies].

Personal data from European applicants is only disclosed or transferred to recipients outside the European Union and the European Economic Area if there are suitable safeguards which ensure adequate data protection standards [e.g. by concluding EU Standard Contractual Clauses with recipients and/or choosing EU-US-Privacy Shield certified providers], unless the transfer is necessary for the implementation of pre-contractual measures taken at the affected applicants request or the applicant affected has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards.

## VI. STORAGE PERIODS

### 1. LOG FILES

The log files of our career website visitors will be deleted after 7 days, unless there is a suspicion of misuse of our service or a cyber-attack which justifies further storage until the facts are finally clarified.

### 2. JOB APPLICATION DATA

In case of a rejection of your application, your provided Personal Data will be deleted 6 months after receiving the rejection, unless you have consented to be included in our talent pool. In the latter case, your Personal Data will be stored for 12 months after consent has been received.

In case of an employment, your Personal Data in your account at our career website will be migrated to our HR system.

## **VII. YOUR DATA PROTECTION RIGHTS**

In accordance with the applicable data protection regulations, you have following rights concerning your Personal Data processed by us:

- Right of access
- Right to rectification
- Right to erasure (“Right to be forgotten”)
- Right to restriction of Processing
- Right to data portability
- Right to object to our Processing(s) based on legitimated interests [Art. 6 sec. 1 lit. f GDPR] on grounds relating to your particular situation

Please direct your requests to exercise these rights by email to [careers@puma.com](mailto:careers@puma.com). To handle your request and for authentication we will also process Personal Data from you [Legal base: Necessary Processing for compliance with legal obligation, Art. 6 sec. 1 lit. c GDPR].

You also have the right to lodge a complaint with our supervisory authority [Art. 77 GDPR].

## **VIII. DATA PROTECTION OFFICER**

PUMA SE has appointed Dr. Peter Katko [+49 (0)89 14331 25951] as group-wide data protection officer.

## DATA PROTECTION STATEMENT- MEXICO

PRIMERA.- Derivada de la relación laboral que sostiene con SERVICIOS PROFESIONALES RDS, S.A. DE C.V. reconoce que es propiedad exclusiva de PUMA MEXICO SPORT, S.A. DE C.V. y /o sus filiales (en adelante PUMA) toda aquella información de carácter confidencial, señalando como confidencial todo tipo de información escrita u oral, tangible o intangible, sobre desarrollos de software, artículos, estudios, publicaciones, manuales, dibujos, trazos, planos, fotografías, folletos, proyectos, diseños, información de propiedad intelectual (marcas, licencias, etc.) y derechos de autor, nuevos desarrollos, estrategias comerciales, de mercadotecnia, de ventas, fiscales y de cualquier otra índole, modelos industriales, reportes, soluciones, investigaciones, listas de clientes o futuros clientes, información actualizada, documentos en general, todo tipo de información técnica, prácticas o políticas comerciales y de ventas tanto de PUMA como de sus clientes o cualquier otro trabajo intelectual o información que se le proporcionen con motivo de su relación o conexión con sus servicios[La Información].

SEGUNDA.- La Información referida en el punto anterior del presente documento, así como La Información relacionada con su desarrollo, es y será en todo momento considerada como un secreto industrial en los términos del Artículo 82 de la Ley de Propiedad Industrial, sobre la cual PUMA tiene los derechos exclusivos. Asimismo, la Información es considerada confidencial y goza de la protección que otorga la Ley de la Propiedad Industrial, La Ley de Derechos de Autor y los Tratados Internacionales aplicables.

TERCERA. Se obliga por este conducto a guardar estricta reserva y absoluta confidencialidad sobre la Información que con motivo de su trabajo hubiese sido de su conocimiento, asimismo se obliga a no utilizar ni divulgar la Información en su beneficio o en beneficio de terceras personas ya sea verbal o por escrito, directa o indirectamente, haciendo patente que es consciente de las responsabilidades legales en las que incurra.

CUARTA. Tiene conocimiento y se encuentra prevenido de que dicha Información le ha significado a PUMA obtener y mantener una ventaja competitiva y económica frente a terceros en la realización de sus actividades empresariales y que su desarrollo ha presentado un alto costo económico para la misma, razón por la cual Servicios Profesionales RDS, S.A. DE C.V. y PUMA han adoptado los mecanismos suficientes y necesarios para preservar la información confidencial y restringir su acceso a terceros.

QUINTA.- Todas las copias de cualquier tipo de información escrita en documentos, contratos, convenios, escrituras, estrategias de cualquier naturaleza jurídica, hojas de cálculo o contenidas en medios electrónicos o magnéticos, discos ópticos, películas, microfilmes, videos, voz u otros instrumentos similares que EL EMPLEADO reciba o desarrolle durante o con motivo de su relación laboral formarán parte de la Información confidencial de PUMA.

SEXTA.- Está de acuerdo, enterado y prevenido de que la Información confidencial se extenderá a toda aquella que pudiera

estar relacionada o no con las funciones que hubiese desarrollado o que hubiese sido recibida accidental o intencionalmente de manera oral, ocular y por escrito durante el desempeño de sus laborales a lo largo del tiempo.

SEPTIMA.-Acepta que la revelación y/o entrega La Información propiedad de PUMA, en ningún momento se entenderá como cesión o transmisión de cualquier tipo de derecho o licencia sobre la misma y deberá ser devuelta cuando se solicite de manera verbal o escrita a la terminación de la relación laboral sostenida con Servicios Profesionales RDS, S.A. de C.V.

OCTAVA.- Es de su conocimiento que el incumplimiento a la obligación de confidencialidad contenida en la presente Carta de Confidencialidad en que de cualquier forma se incurra, será considerado como una violación al secreto industrial propiedad de PUMA, sancionable de conformidad con lo que la Ley de la Propiedad Industrial establece en sus artículos 223 fracciones IV, V y VI, 224, 226, 227 y 228, en relación con los secretos industriales o por los Tratados Internacionales aplicables, así como a la reparación de daño material o la indemnización por daños y perjuicios.

NOVENA.- Acepta y reconoce que las obligaciones de confidencialidad contenidas en este documento, no tendrán limitación temporal.

Sirva la presente para todos los efectos legales a que haya lugar.

## DATA PROTECTION STATEMENT- ARGENTINA

Por medio del presente, otorgo a UNISOL SA mi consentimiento expreso para el procesamiento de todos los datos personales que he ingresado al aplicar a la búsqueda laboral publicada por PUMA en su página web. A este efecto, UNISOL SA me recuerda que tengo derecho a rectificar, actualizar y suprimir mis datos, así como también que todo titular de datos personales tiene la facultad de ejercer el derecho de acceso a los mismos en forma gratuita a intervalos no inferiores a seis meses, salvo que se acredite un interés legítimo al efecto conforme lo establecido en el artículo 14, inciso 3 de la Ley N° 25.326. La Dirección Nacional de Protección de Datos Personales, órgano de control de la referida Ley, tiene la atribución de atender las denuncias y reclamos que se interpongan con relación al incumplimiento de las normas sobre protección de datos personales.

UNISOL SA utilizará mis datos personales exclusivamente a fines laborales y administrativos, pudiendo transferirlos a su casa matriz o empresas vinculadas, así como administrarlos dentro de sus sistemas informáticos.

UNISOL SA/PUMA pone a mi disposición una copia de su Política de Privacidad.