



## PRIVACY NOTICE FOR JOB APPLICANTS

The present Privacy Notice for job applicants describes the protection of personal data of prospective employees during the recruitment procedure and it applies to recruitment activities carried out by **Tito & Friends Dienstleistungs GmbH**, both in its own capacity as an employer and as the centralized back-office and HR services provider for the following group of companies: **Reppublika Data Analytics & Technologies GmbH**, **Talk Online Panel GmbH**, **Reppublika Research & Analytics GmbH**, and **IfaD GmbH Institut für angewandte Datenanalyse**. This Privacy Notice informs you about how we use and protect the personal information you provide to us when you apply for a position in our organization and in general when you express your interest in joining our team. It also explains which information we collect during the job application and recruitment process, the relevant legal bases for processing such information, how we use the information, how long we retain it, the rights job applicants have as data subjects and any other information required under the General Data Protection Regulation (EU) 2016/679 (hereinafter “GDPR”) and applicable national data protection laws in the countries where various subsidiary companies within our group are located.

A separate personal data privacy notice applies to the Company's employees.

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## **1. Data Controller and Contact Details**

Responsible for the processing of personal data within the meaning of Art. 4 (7) GDPR is Tito & Friends Dienstleistungs GmbH (Company Registry no. FN 322898 a, Tax Identification Number: ATU64761109) having its registered office in Karls gasse 7/5, 1040 Vienna. For any questions regarding the protection of your personal data please contact: [dpo@titoandfriends.com](mailto:dpo@titoandfriends.com).

## **2. Scope of Application**

This Privacy Notice applies if you send us your CV or if you disclose any other personal information that may be included in your application for a specific job position within any of our group of companies or if you otherwise communicate with us on your own initiative, expressing an interest in joining our team.

## **3. Categories of Personal Data**

We are committed to protect the privacy and security of your personal data. By "personal data" we mean information which, alone or in combination with other information available to the company, can be used to identify you. Personal information does not include data where the identity has been removed, and it is not possible to identify any individual (anonymous information).

Personal information that may be collected by us during the recruitment process (whether when you respond to our advertisement, when you send your CV to us, or when you participate in a job interview online or in our office premises) may include:

- identification data and contact details such as your name, date of birth, home address, email address, mobile and landline telephone numbers, social security number or VAT Number (if applicable), passport number and other contact details.
- Education and academic studies, previous and/or relevant work experience, foreign languages, possession of diplomas or licenses (e.g., driving license) other qualifications, skills, talents, working permits or other information that you provide to us in support of an application and for suitability when seeking employment, eligibility to work in the Company's country of operation.
- Information about any previous applications and/or employment history you have had with our company.
- Other personal information you have provided in your CV and/or cover letter.
- Information from your LinkedIn profile (if you refer to your LinkedIn profile in your CV or application).
- Information from job interviews and selection procedures in which you may have participated e.g., interview notes, communication details, such as email content etc.
- Details of the type of your current job or job you are seeking, your current and/or desired salary and other terms relating to pay and benefits or other employment preferences.
- Any special category of information obtained during the application or recruitment process, information about your nationality and/or citizenship, medical or health information.
- Referral information including information provided by third parties with your consent.
- Images and activity captured using CCTV in our office premises. (For more Information, please see our Privacy Notice regarding the processing of personal data through the video surveillance system which is available at our reception).



The provision of personal data is voluntary however it is necessary in order for us to decide whether to conclude an employment contract with you and for taking measures prior to the conclusion of a contract (i.e., assessment of the candidate) or the performance of a contract already concluded. If you do not provide us with the personal data, the recruitment process may be delayed and/or we may not be able to adequately assess your application for a job and may therefore have to reject it.

#### **4. Purposes of Processing**

We process your personal data, to the extent permitted by applicable law, for the following purposes:

- assessing your skills, qualifications and interests in relation to the employment requirements of our company and your suitability for the specific job for which you are applying,
- verification of your information,
- consideration of any objections to the decision not to recruit,
- confirming recommendations upon your prior consent,
- communicating with you about the recruitment process and/or your application(s) and possible future career opportunities with our company,
- compliance with applicable laws and regulations, or to protect the company's legitimate interests (e.g., to defend the Company against legal claims) in a legal proceeding.

If the recruitment process is completed and we offer you the job, you will be informed about the Privacy Notice that is applicable to our Company Employees. The Employees Privacy Notice includes the relevant information and the lawful basis under which we will process personal data during your employment.

#### **5. Legal Basis for Processing**

- The processing of your Personal Data is mainly necessary to assess your application and is based on Article 6 (1) (b) of the GDPR in the context of the employment relationship or during the period prior to the conclusion of the employment relationship.
- In addition, The Company has a legitimate business interest under Article 6 (1) (f) of the GDPR to process personal data during the recruitment process and to keep records of the process to employ only people who are most suitable and eligible for a particular job. Processing your personal data throughout the recruitment process is necessary to assess and confirm the suitability of the candidate for employment and to decide whom to employ.
- Furthermore, in some cases, we need to process data to ensure that we comply with our legal obligations or to respond to and defend legal claims (Article 6 (1) (c) of the GDPR) or where you have given us your specific consent to do so (6 (1) (a) of the GDPR) for e.g., to allow the Company to contact you about potential jobs, in our Company or in one of our affiliate entities, that may be of interest to you.

#### **6. Disclosures and Recipients of Personal Data**

Your personal data is shared internally within our Company, between its various departments or within the affiliates of our extended Company Group in the process of selecting candidates for employment with us. This internal disclosure is done in a secure manner and "on a need-to-know basis". The company staff are subject to a confidentiality obligation through a specific Confidentiality Agreement.



We may transfer some of your personal data to third parties, to the extent permitted under Article 6(1)(f) of the GDPR, to satisfy legitimate interests of the Company, i.e., to enable us to support our recruitment processes.

We may use software systems or services provided by third party service providers to support our recruitment processes. These service providers are called "processors" and have a legal obligation under the GDPR and to the Company to protect your personal data and use it only to provide the agreed service. Especially at the recruitment stage your personal data may also be disclosed to third parties such as accounting service providers, employment agencies, insurance companies or companies and other regulatory authorities if we are obliged to do so by applicable law under Article 6(1)(c) of the GDPR.

Where we share your data as a data controller with another data controller, that company's use of that information is subjected to its own privacy policy. The Company makes every effort to select partners that provide high quality, trustworthy, reliable, protective and secure services, but is not responsible for the use of information by those companies. These partners may use your personal information to contact you directly.

Other than in the above-mentioned cases, your information will not be transferred or disclosed to third parties for marketing or other purposes.

## **7. Transfer of Personal Data to Other Countries**

Your personal information is generally not transferred outside the European Economic Area. In the event that there is a need to do so, and the transfer involves countries that have not been designated by the European Commission as having adequate legal protection for personal data, we will take all necessary steps to ensure adequate protection of the information, such as entering into appropriate data transfer agreements based on Standard Contractual Clauses approved by the European Commission as referred to in Article 46(5) of the GDPR or by other adequate means.

## **8. Accuracy of Personal Data**

It is important that the personal information we hold about you is accurate and up to date. For this reason, we kindly ask you to inform us as soon as possible if any of your information changes or is incorrect during the recruitment process.

## **9. Retention Period of Your Personal Data**

The main principle is that Personal Data pertaining to a job application will be deleted as soon as a decision has been made regarding the position, and any applicable appeal or dispute periods have expired. In other words, Personal Data processed for these purposes hereunder will be stored only as long as necessary during the recruitment process and a following reasonable period (taking into account statutory limitation periods) as required or permitted under applicable law (e.g., as necessary to defend against claims in relation to the application process, or to comply with our obligations regarding data retention as established in the applicable laws). If a judicial action is initiated, the Personal Data may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived as permitted by applicable law.

Specifically, we will retain any personal information you have sent us in our records during the recruitment period for the position you applied for which lasts usually one (1) month, for reference in order to contact you for the purpose of any future collaboration and job opportunities in our company, or in one of our affiliate entities, unless you request that we delete your data, or you withdraw your consent for this specific purpose.



The company may retain anonymous data for statistical purposes or to improve our recruitment processes.

In case your application is successful, we may store your personal data within the subsequent employment in compliance with the applicable legal regulations. More information can be found in the Data Privacy Notice for employees that we will provide to you on acceptance of the job.

## 10. Your Rights in Relation to Personal Data

The applicable legislation provides, subject to the more specific conditions set out therein, certain rights in relation to the processing of your Personal Data. Under the GDPR, you have the following rights:

- **Right of access:** you have the right to obtain confirmation from us as to whether Personal Data concerning you is processed and, if it is processed, to request access to your personal data. The access information includes - inter alia - the categories of Personal Data concerned, the purposes of the processing and the recipients or categories of recipients. We will, however, need to consider the interests of other persons, so this is not an absolute right, and if you request additional copies, we may charge you a fee.
- **Right of rectification:** you have the right to obtain from Us the rectification of inaccurate Personal Data concerning you. Depending on the purposes of the processing, you have the right to complete incomplete Personal Data, even by providing a supplementary declaration.
- **Right to erasure (right to be forgotten):** you may have the right to ask Us to erase your Personal Data; however, please note that this right is not absolute. There are circumstances in which you may not be able to exercise this right, as well as circumstances in which we may refuse to comply with your request, for example where it is necessary to process your data to defend our legal claims.
- **Right to restrict processing:** In certain circumstances, you may have the right to request restriction of processing of your Personal Data, however, where we process Employee Data and Special Categories of Employee Personal Data for the Processing Purposes, we believe that we have a legitimate interest in the processing, which may override any request you may make.
- **Right to data portability:** you may have the right to receive the Personal Data concerning you that you have provided to us in a structured, commonly used and machine-readable format and the right to transmit that data to another person.
- **Right to object:** In certain circumstances you may have the right to object to our processing of your Personal Data, including profiling, for reasons related to your situation at any time, and we may be required to no longer process your Personal Data. This may include requesting human intervention regarding an automated decision so that you can express your views and challenge the decision. If you have a right to object and exercise that right, your Personal Data will no longer be processed by us for such purposes. Exercising this right does not involve any costs. There may be no such right to object, in particular if the processing of your Personal Data is necessary for taking measures prior to the conclusion of a contract or the performance of a contract already concluded.
- **Right to withdraw consent:** if the processing of your personal data is based only on your consent, you can withdraw your consent at any time. Any withdrawal of consent does not affect the lawfulness of the processing by the Company prior to its withdrawal.

Please note that the aforementioned rights might be limited under the GDPR or other applicable data protection legislation.



## 11. Questions or Complaints

In order to exercise any of the above rights or for any questions regarding this Notice and our privacy practices, you can send an email to us at [dpo@titoandfriends.com](mailto:dpo@titoandfriends.com) or send a registered letter to Karlsgasse 7/5, 1040 Vienna Austria.

If you wish to lodge a complaint regarding the processing of your personal data by the Company, you can contact the Personal Data Protection Authority [in your country of residence](#).

## 12. Changes to this Privacy Notice

This Privacy Notice is reviewed periodically by the Company and, whenever necessary, updated. You will be given adequate notice of any relevant changes.

This Privacy Notice was last updated in July 2025.