

# PRIVACY STATEMENT FOR JOB APPLICANTS



Last modified: 10 December 2018

This Privacy Statement (“Statement”) applies to the KYOCERA Document Solutions company (“KYOCERA”) who has posted the job application. A list of the applicable KYOCERA companies is located under the heading [‘Exercising your rights and contacting us’](#).

This Statement applies to the collection of personal information by KYOCERA in relation to the job application process and the onboarding process before entering into an employment agreement with KYOCERA.

In this Statement, we will explain in detail the following:

- Why we are processing your personal information and on what legal basis;
- What personal information do we process;
- With whom we share your personal information;
- To which countries your personal information is sent to;
- For how long we keep your personal information;
- Which technical and organizational measures we have taken;
- What your legal rights are concerning us processing your personal information;
- How you can contact us and other important information.

## WHY ARE WE PROCESSING YOUR PERSONAL INFORMATION AND ON WHAT LEGAL BASIS?

- Managing your job application.** We have a legitimate interest to process your personal information so that we can assess who is most suitable for the position. In the job application process, we may want to check any references, but only after your consent. We may also want to view your public social media profiles, other public information about you, or perform a background check, but will only do so if such is necessary and relevant to the position you apply for.
- Onboarding.** In case your application is successful, we have a legitimate interest to process your personal information so that we can offer you a position, you can enter into employment with us and to welcome you aboard.
- Future opportunities.** If we would like to contact you in case of any upcoming employment opportunities for which you may be suitable, we shall ask you for your consent to keep your personal information on file for a maximum of one year. You may withdraw your consent any time.
- Legal purposes.** Sometimes we need to use your information to handle legal claims, or to comply with applicable legal obligations or law enforcement agency requests.

We have made a careful assessment of your fundamental rights and freedoms and our legitimate business interests and are continuously monitoring the balance. Should you however wish to object to the processing of your personal information based on our legitimate business interest, please see the section 'Your rights' below.

## WHAT PERSONAL INFORMATION DO WE PROCESS?

Other than the information that you have supplied us with, we may process the following personal information about you:

- Character and/or performance information from referees;
- Background check information from public authorities;
- Pre-employment assessment information from assessment service providers;
- Personal information from the public section of your social media account(s), or other public information about you;

## WHO ARE WE SHARING YOUR PERSONAL INFORMATION WITH?

Your personal information shall only be shared with:

- Relevant KYOCERA employees who are involved in the job application process, this includes members of HR, interviewers involved in the job application process, managers in the business area of the application, potential internal clients and IT staff.
- Your former employer(s) as referees, or other referees, but only after your consent;
- An assessment service provider in case a pre-employment assessment would be part of the application process;
- Public authorities for an employment background check in case the job application would be successful;
- Other KYOCERA group companies, such as KYOCERA Document Solutions Inc. (Japan) in case the job application would be successful for the purpose of internal approval;
- To the extent we are required by law, regulation or court order to disclose your personal information, we may have to share your personal information in compliance with that law, regulation, or court order.

## INTERNATIONAL TRANSFERS

Where we transfer (see above to whom we are sharing your personal information with) your personal information to a country that does not provide an adequate level of protection by domestic law according to the European Commission, we have ensured this adequate level of protection by agreeing on additional appropriate safeguards with that group company or third party through the Standard Data Protection Clauses adopted by the European Commission. A list of countries that have ensured an adequate level of protection according to the European Commission can be found [here](#).

Where we use service providers from the US, such US based service provider has registered itself to be on the [EU/US Privacy Shield](#) list and has been self-certified with the US

Department of Commerce. More information on the European Commission decision on the adequacy of the EU/US Privacy Shield can be found [here](#).

Alternatively, we may ask you for your explicit consent to the proposed transfer. You may request a copy of the Standard Data Protection Clauses by sending us an email, motivating your request.

## FOR HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

Where possible, we have set specific retention periods for keeping your personal information. These specific retention periods are stated below, or we shall communicate these to you at or before we start processing your personal information.

Where it is not possible for us to use set retention periods, we have stated below the criteria that we use to determine the retention periods.

### Specific retention periods

**Purpose (A) Managing your job application.** In case the job application is unsuccessful, we shall keep your personal information for a maximum of four weeks after the job application process has ended.

**Purpose (B) Onboarding.** In case the job application is successful and we can welcome you aboard, we shall store your personal information in our personnel files, which we shall keep in accordance with our company's data protection policy retention times.

**Purpose (C) Future opportunities** In case you consent to us keeping your personal information for future opportunities, we shall keep your personal information for a maximum of one year after the job application process has ended.

### Criteria for determining retention periods

In any other circumstances, we use the following criteria to determine the applicable retention period:

- The assessment of your fundamental rights and freedoms;
- The purpose(s) of processing your personal information. We shall not keep your personal information longer than is necessary for the purpose(s) we collected it for.
- Any relevant industry practices or codes of conduct on keeping personal information;
- The level of risk and cost associated with keeping your personal information (accurate and up-to-date);
- Whether we have a valid lawful basis to keep your personal information;
- The nature, scope and context of processing of your personal information and our relationship with you.
- Any other relevant circumstances that may apply.

In any case, we shall keep your personal information in compliance with applicable legal requirements and we make periodical reviews of the personal information we hold.

## WHICH TECHNICAL AND ORGANIZATIONAL MEASURES WE HAVE TAKEN

We take the security of your personal information very seriously and take all reasonable efforts to protect your personal information from loss, misuse, theft, unauthorized access, disclosure or modification.

## YOUR RIGHTS

You have certain legal rights that we wish to inform you of.

**Access.** You have the right to be informed on whether we process your personal information or not and to related information on that processing.

**Rectification.** You have the right to have your personal information rectified or completed by us without undue delay. If you have set up an account with us, you have the possibility to rectify or complete your personal information yourself.

**Right to be forgotten.** You have the right to have your personal information erased by us without undue delay. This right is limited to specific grounds, for example if you have withdrawn your consent, or if you object and there are no overriding legitimate grounds for us to maintain the processing. If you have an account with us, in many instances you have the option to erase your account yourself, in which case all your personal information is permanently deleted.

**Restriction of processing.** You have the right to request that we restrict the processing of your personal information based on specific grounds. These are (1) the time for us to verify the accuracy of your personal information on your request; (2) instead of erasure of unlawful processing, you request restriction of use instead; (3) you need personal information in legal proceedings; or (4) we are verifying whether our legitimate grounds override your objection to the processing.

**Right to object.** You have the right to object at any time to our processing of your personal information if such processing is (1) based on our legitimate interest (including us making a profile of you based on your consent); (2) for direct marketing purposes; or (3) necessary for the performance of a task carried out in the public interest or exercise of official authority vested in us. We shall cease to process your personal information based on your objection, unless we demonstrate compelling legitimate grounds overriding your interests, rights and freedoms or if we need your personal information in legal proceedings.

**Data portability.** We are required to inform you of your right to receive your personal information from us so that you can transmit that personal information to another service provider. For KFS that means that at your request we shall supply you with your personal information related to your user account. It does not include any device data, including data that was transmitted to us in a log file.

**Consent withdrawal.** If you have supplied us with your personal information based on your consent, you have the right to withdraw such consent at any time. You may do so by unsubscribing from the service that you have subscribed to if applicable. You may also do so by sending us an email to the applicable privacy email address as stated below. We shall then permanently remove your personal information from our database.

**Lodging a complaint.** You have the right to lodge a complaint with a supervisory authority, in particular in the country of your residence, about our processing of your personal information. You can find a complete list of supervisory authorities [here](#).

## EXERCISING YOUR RIGHTS AND CONTACTING US

At KYOCERA Document Solutions we have a network of privacy professionals available, including Data Protection Officers, to assist you with your queries. If you wish to exercise any of your rights, or you have a question about this document, please contact us via email, or send us a letter to the applicable KYOCERA Document Solutions company in the list below. If your country is not listed, please contact our group Data Protection Officer:

KYOCERA Document Solutions Europe B.V.  
 Attn.: Data Protection Officer  
 Bloemlaan 4  
 2132 NP Hoofddorp  
 The Netherlands  
 e: [privacy@deu.kyocera.com](mailto:privacy@deu.kyocera.com)

<p><b>België/Belgique/Belgien</b>          KYOCERA Document Solutions Belgium N.V.          Attn.: Data Protection Officer          Sint-Martinusweg 199-201          1930 Zaventem          e: <a href="mailto:privacy@dbe.kyocera.com">privacy@dbe.kyocera.com</a></p>	<p><b>Ceska Republica</b>          KYOCERA Document Solutions Czech, s.r.o.          Attn.: Data Protection Officer          Harfa Office Park Českomoravská 2420/15          Praha 9, 190 00          e: <a href="mailto:privacy@deu.kyocera.com">privacy@deu.kyocera.com</a></p>
<p><b>Danmark</b>          KYOCERA Document Solutions Danmark A/S          Attn.: Data Protection Officer          Eljby Industrivej 60          2600 Glostrup          e: <a href="mailto:privacy@ddk.kyocera.com">privacy@ddk.kyocera.com</a></p>	<p><b>Deutschland</b>          KYOCERA Document Solutions Deutschland GmbH          Attn.: Data Protection Officer          Otto Hahnstrasse 12          40670 Meerbusch          e: <a href="mailto:datenschutz@dde.kyocera.com">datenschutz@dde.kyocera.com</a></p>
<p><b>España</b>          KYOCERA Document Solutions España SA          Attn.: Data Protection Officer          Avenida Manacor 2, Parque Rozas, 28290 Las Rozas, Madrid          e: <a href="mailto:privacy@des.kyocera.com">privacy@des.kyocera.com</a></p>	<p><b>Finland</b>          KYOCERA Document Solutions Finland oy          Attn.: Data Protection Officer          Atomite 5 C, 4 krs          00370 Helsinki          e: <a href="mailto:privacy@dfi.kyocera.com">privacy@dfi.kyocera.com</a></p>
<p><b>France</b>          KYOCERA Document Solutions France S.A.S.          Attn.: Data Protection Officer          Parc Technologique Route de l'Orme          91195 Saint Aubin          e: <a href="mailto:privacy@dfr.kyocera.com">privacy@dfr.kyocera.com</a></p>	<p><b>Italia</b>          KYOCERA Document Solutions Italy S.P.A.          Attn.: Data Protection Officer          Via Monfalcone 15          20132 Milan          e: <a href="mailto:privacy@dit.kyocera.com">privacy@dit.kyocera.com</a></p>
<p><b>Nederland</b>          KYOCERA Document Solutions Nederland B.V.          Attn.: Data Protection Officer          Beechavenue 25          1119 RA Schiphol-Rijk          e: <a href="mailto:privacy@dnl.kyocera.com">privacy@dnl.kyocera.com</a></p>	<p><b>Österreich</b>          KYOCERA Document Solutions Austria GmbH          Attn.: Data Protection Officer          Wienerbergstrasse 11          Turm A, 18. OG, 1100, Vienna          e: <a href="mailto:privacy@dat.kyocera.com">privacy@dat.kyocera.com</a></p>

<p><b>Portugal</b>  KYOCERA Document Solutions Portugal Lda.  Attn.: Data Protection Officer  Ruaa do Centro Cultural 41  1700-106 Lisbon  e: <a href="mailto:privacy@dpt.kyocera.com">privacy@dpt.kyocera.com</a></p>	<p><b>Rossiya</b>  KYOCERA Document Solutions Russia L.L.C.  Attn.: Data Protection Officer  Shchepkina Street, Building 51/4, Block 2  129110 Moscow  e: <a href="mailto:privacy@deu.kyocera.com">privacy@deu.kyocera.com</a></p>
<p><b>Sverige</b>  KYOCERA Document Solutions Nordic AB  Attn.: Data Protection Officer  Box 1273  164 29 Kista  e: <a href="mailto:privacy@dnr.kyocera.com">privacy@dnr.kyocera.com</a></p>	<p><b>South Africa</b>  KYOCERA Document Solutions South Africa Pty. Ltd.  Attn.: Data Protection Officer  Hertford Office Park, 90 Bekker Road CNR Allandale,  Vorna Valley, 1682  e: <a href="mailto:privacy@deu.kyocera.com">privacy@deu.kyocera.com</a></p>
<p><b>Turkiye</b>  KYOCERA Bilgiyaş Turkey Doküman Çözümleri A.Ş  Attn.: Data Protection Officer  Altunizade Mah. Prof. Fahrettin Kerim Gökay Cad.  No:45 34662 ÜSKÜDAR İSTANBUL  e: <a href="mailto:privacy@deu.kyocera.com">privacy@deu.kyocera.com</a></p>	<p><b>United Kingdom</b>  KYOCERA Document Solutions (U.K.) Limited  Attn.: Data Protection Officer  Eldon Court 75-77 London Road, Berkshire  RG1 5BS Reading  e: <a href="mailto:privacy@duk.kyocera.com">privacy@duk.kyocera.com</a></p>

Please note that in exercising your rights, we may ask you to complete a request form. We shall then inform you of the process of handling your request.

#### CHANGES TO THIS DOCUMENT

In the event that we modify this document, we will publish it on our website with a revised publication date and, if applicable, notify you of the changed document via your user account.

#### OTHER KYOCERA PRIVACY STATEMENTS

In addition to this Statement, there is an online privacy statement available at [kyoceradocumentsolutions.eu](http://kyoceradocumentsolutions.eu).