

## DATA PROTECTION POLICY "Application"

VIENNA HOUSE HOTELMANAGEMENT GMBH

1)	<b>Processing activity</b>	<b>Application Management<sup>1</sup></b>	
2)	<b>Responsible person / Employer</b>	<b>Vienna House Hotelmanagement GmbH ("VIENNA HOUSE")</b> Business address: Dresdner Straße 87, 1200 Vienna, Austria Telephone: +43 1 333 73 73-0 Email: office@viennahouse.com	
3)	<b>Purposes of data processing</b> • on the legal basis of the preparation of the contract	a)	management of the application process
		b)	selection of suitable employees
		c)	documentation of a fair, legal selection process
4)	<b>Legal basis of data processing</b>	<b>1) Contract preparation (Art. 6 (1)(b) GDPR)</b> <b>2) Consent (Art 6 (1)(a) GDPR):</b> If an application is not successful, the applicant can voluntarily consent that the employer stores his personal data for a period of 5 years after the end of the current year of the application, and returns to it where required. Furthermore, the applicant can voluntarily consent that his personal data are also transferred to companies in the group, should a position come into consideration for him there. <b>3) Legitimate interest to process data</b>	
5)	<b>Analyses of personal aspects of the employer ("profiling")</b>	The employer does not undertake any profiling measures within the framework of the employment relationship.	
6)	<b>Obligation to provide data</b>	The applicant undertakes to provide his data correctly.	
7)	<b>Automated decision-making</b>	The applicant is <u>not subject to any</u> automated decision which has a legal effect on him.	

<sup>1</sup> Any references to natural persons within this data protection policy which are only provided in the masculine form relate equally to both women and men. The gender-specific form is to be used when referring to specific natural persons.

<b>8) Types of data processed</b>	<b>disclosed by the applicant</b>	<b>captured by the employer in addition</b>
	Name	
	Home address	
	Email address	
	Telephone	
	Citizenship	
	Date of birth	
	Place/country of birth	
	Gender	
	Photo	
	Family status	
	Qualification data (education)	
	Previous employers	
	Position applied for	
References (certificates of service)		
Evidence of employment		
<b>9) Internal recipients of data</b>	Company management, HR department	
<b>10) External recipients of data</b>	<p>Within the group, personal data is only received by offices, employees and vicarious agents who require these data to satisfy contractual and legal obligations as well as to safeguard legitimate interests. Processors only receive data insofar as this is necessary for their respective tasks. All processors are contractually obliged to comply with all data protection law provisions. A current list of companies in the group can be found <a href="#">here</a>.</p>	
	<p><b>Contact can be made with all external recipients via the persons responsible or their data protection officers for all data protection queries.</b></p>	
<b>11) Transfer to third states</b>	No data is transferred to states outside the EU as part of data processing.	
<b>12) Retention period</b>	<p><b>Legal basis of contract preparation:</b> On the legal basis mentioned above as well as statutory provisions (the law on equal treatment), the employer generally continues to process electronic data for <b>an additional 40 months after appointment to the position</b> (= 36 months for potential contractual damage claims + max. 4 months to file suit) in a manner which is personally identifiable, and thereafter deletes the data (or at least the data which allows</p>	

		reference to be drawn to the data subject's identity). Physical data (paper format) will be destroyed immediately following rejection.
		<b>Legal basis consent:</b> Insofar as the applicant has granted consent to priority notice of his application and forwarding within the group, the data shall be stored until revocation of the consent, but for a maximum of 5 years after the end of the current year of the application, and thereafter erased.
<b>13) Applicant's rights</b>	<b>Basis</b>	<b>Substance</b>
	Art. 15 GDPR "Right of access"	The applicant has the right to obtain information as to whether his personal data is being processed.
	Art. 16 GDPR "Rectification"	The applicant has the right to request that inaccurate personal data be rectified or completed immediately.
	Art. 17 GDPR "Erasure"	The applicant has the right to demand the deletion of personal data without undue delay where one of the grounds stated under Art. 17 Para. 1 GDPR applies.
	Art. 18 GDPR "Restriction"	The applicant has the right to demand that the processing of personal data is restricted where one of the grounds stated under Art. 18 Para. 1 GDPR applies.
	Art. 21 GDPR "Object"	The applicant has the right to lodge an objection at any time to the processing of his personal data on the legal basis of Art 6 (1)(e) (processing in the public interest) or (f) (processing on the basis of a legitimate interest).
	Art. 20 GDPR "Data portability"	The applicant has the right to receive his provided personal data in a structured, commonly used and machine-readable format.
<b>14) Right to lodge a complaint</b>	Art. 77 GDPR	Every applicant has the right to lodge a complaint with a supervisory authority if he considers that the processing of personal data relating to himself infringes on this regulation.
<b>15) Supervisory authority</b>	<b><u>Austria</u></b> <b>Austrian Data Protection Authority</b> Barichgasse 40-42, 1030 Vienna, Austria Tel.: +43 1 52 152-0 E-Mail: <a href="mailto:dsb@dsb.gv.at">dsb@dsb.gv.at</a> Website: <a href="http://www.dsb.gv.at">www.dsb.gv.at</a>	

## **Czech Republic**

### **The Office for Personal Data Protection**

Urad pro ochranu osobnich udaju

Pplk. Sochora 27

170 00 Prague 7

Tel.: +420 234 665 111

Fax: +420 234 665 444

E-Mail: [posta@uouu.cz](mailto:posta@uouu.cz)

Website: [www.uouu.cz](http://www.uouu.cz)

## **France**

### **Commission Nationale de l'Informatique et des Libertés - CNIL**

3 Place de Fontenoy - TSA 80715 – 75334

F-75002 Paris, Cedex 02

Tel.: +33 1 53 73 22 22

Fax: +33 1 53 73 22 00

Website: [www.cnil.fr](http://www.cnil.fr)

## **Germany**

### **Bundesbeauftragte für den Datenschutz und die Informationsfreiheit**

Husarenstraße 30

53117 Bonn

Tel.: +49 228 997799 0; +49 228 81995 0

Fax: +49 228 997799 550; +49 228 81995 550

E-Mail: [poststelle@bfdi.bund.de](mailto:poststelle@bfdi.bund.de)

Website: [www.bfdi.bund.de](http://www.bfdi.bund.de)

The competence for complaints is split among different data protection supervisory authorities in Germany. Competent authorities can be identified according to the list provided [here](#).

## **Poland**

### **Personal Data Protection Office**

ul. Stawki 2, 00-193 Warsaw

Tel.: +48 22 53 10 300

Fax: +48 22 53 10 30

Infoline: +48 606 950 000

E-Mail: [kancelaria@uodo.gov.pl](mailto:kancelaria@uodo.gov.pl)

Website: [www.uodo.gov.pl](http://www.uodo.gov.pl)

## **Romania**

### **The National Supervisory Authority for Personal Data Processing**

Opre B-dul Magheru 28-30 Sector 1

BUCUREȘTI

Tel.: 40.318.059.211

Fax: 40.318.059.602

E-Mail: [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro)

Website: [www.dataprotection.ro](http://www.dataprotection.ro)

**Slovakia**

**Office for Personal Data Protection of the Slovak Republic**

Hraničná 12, 820 07

Bratislava 27

Tel.: + 421 2 32 31 32 14

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Website: [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk)