

## PRIVACY POLICY ON PROCESSING PERSONAL DATA

In connection with the contract you have signed, we as your contract partner will process your personal data in order to be able to fulfill our obligations to you under the contract as well as the applicable laws. As a contracting partner, we naturally pay attention to your privacy.

In accordance with the EU General Data Protection Regulation, we provide you with the following information about the details of the processing of your personal data.

As your contractual partner, we are responsible for your personal data.

### Our contact details:

**Company name:** ARGO Personalentwicklung GmbH  
**Address:** Dresdner Straße 43/DG, 1200 Vienna  
**Phone number:** +43-1-369 77 00  
**E-Mail:** [privacy@argo.at](mailto:privacy@argo.at)

For clarification, we note that no legal claims can be derived from this information.

### 1. Purposes of data processing

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We will process and transmit your data in accordance with applicable laws and contractual agreements. Likewise, we will provide the security you need to protect your privacy.

In the context of the concluded contract between you and us or a concluded contract with your employer (if you are in an employment relationship), we process your personal data, in particular for the provision of our services, as well as for the following further purposes:

- 1.1. **General compliance**, in particular ensuring compliance with legal compliance obligations, such as compliance screening or documentation requirements (in particular under competition law, export regulations, trade sanctions and embargo regulations, anti-bribery and anti-corruption laws and internal regulations or to prevent economic or money laundering offenses or other acts, such as judicial or administrative offenses).
- 1.2. **Regulatory compliance**, in particular ensuring compliance with our legal and regulatory obligations and requirements, including notifications to and reviews by national and international regulatory, enforcement or other authorities.
- 1.3. **Security purposes**, in particular safeguarding and protecting the integrity and security of assets, in particular IT and communications systems, platforms and websites and other systems and installations, investigation, control and detection of security threats, fraud, theft or other criminal or harmful activities; data backup and privacy control.
- 1.4. **Documentation purposes**, in particular compliance with legal documentation, retention and information requirements, in particular accounting duties.
- 1.5. **Legal and interest pursuit**, in particular evidence; out-of-court and judicial enforcement and defense against claims and allegations against authorities, courts and other entrusted institutions.

### 2. Personal data

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In connection with your contractual relationship, we process your personal data that you have disclosed to us.

### 3. *Legal basis of data processing and legitimate interests*

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The legal basis for the processing of your personal data is set out in Article 6 of the European General Data Protection Regulation. The processing of your personal data takes place either for the fulfillment of your contract (Art. 6 para. 1 lit. b) with us, for the fulfillment of our legal obligations (Art. 6 para 1 lit c) or for the purpose of safeguarding our legitimate interests (Art. 6 para 1 lit. f), unless in the latter case your interests or fundamental rights and fundamental freedoms requiring the protection of personal data prevail. In addition, processing may be based on your consent, as far as you have given it to us.

Our legitimate interests are to build and maintain our business relationship with you, to comply with internal standards and regulations, asset security and legal action.

### 4. *Automated individual decisions*

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You will not be subject to any decision based solely on automated processing, which will have any legal effect on you or, in a similar manner, significantly affect you.

### 5. *Receiver*

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A transmission of the relevant data can in each individual case be planned to the following recipients:

- 5.1. **Professional consultants:** in particular tax consultants, auditors, lawyers, management consultants;
- 5.2. **Public authorities:** in particular tax and financial authorities, other administrative authorities and courts as well as regulatory bodies;
- 5.3. **Cooperation partner for the personality analysis as well as other cooperation partners;**
- 5.4. **Carriers;**
- 5.5. **Gastronomy and hotel businesses**

### 6. *Collection of personal data*

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In principle, we collect your personal data directly from you, in particular during the initiation of the contract, your visit to our website, your communication with us and otherwise in the course of the contractual relationship. If you are employed and your employer uses our services or is our contractual partner, we may be able to obtain the following categories of data about you from your employer:

- 6.1. **Personal data**, such as Surname and first name, age range, gender;
- 6.2. **Occupational data**, such as business contact data, your position and career development data.

### 7. *Obligation to provide the data*

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The provision of your personal information is necessary to complete and execute the contract, to fulfill legal obligations, to organize and run our business, including to fulfill our obligations to our business partners and to comply with our corporate philosophy and standards. Failure to provide it would result in our failing to meet our contractual and legal obligations and not being able to operate our business economically with the due care and diligence of a proper business.

### 8. *Transmission and processing of data outside the EU / EEA*

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In exceptional cases, your data can be processed outside the EU / EEA. ARGO only transmits data to recipients in third countries if they guarantee a level of data protection equivalent to national law. This does not apply if the transmission takes place on the basis of a legal obligation or is part of an order by a contractual partner in the third country.

### *9. Duration of storage of your data*

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Your personal information will be erased if it is no longer reasonably needed for the permitted purposes or if you revoke your consent and we are not legally required or otherwise authorized to retain the information. Your data will be stored, in particular, within the framework of the statutory retention obligations and as long as they assert, enforce and defend claims or assert and enforce claims, represent interests and defend against allegations in official or judicial or other institutional procedures provided for this purpose may be necessary.

### *10. Your rights*

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You have the right to information about your personal data, right to rectification, right to cancellation, right to restriction of processing, right to object to processing and right to data portability.

If the processing of your personal data is based on your consent, you have the right to revoke the consent at any time by post to ARGO Personnel Development GmbH, Dresdner Straße 43/DG, 1200 Vienna, Austria or by e-mail to [privacy@argo.at](mailto:privacy@argo.at) without affecting the legality of the processing carried out on the basis of the consent until the revocation.

You also have the right to complain to the Data Protection Authority about the processing of your personal data.

We reserve the right to update or change this privacy policy, as appropriate. The current version can be found at <https://www.argo.at/en/data-protection>.