# **Privacy Statement**

We would like you to feel comfortable visiting our career portal. It is very important to us to protect your privacy when your personal data are processed.

In this privacy statement we describe how we collect, use and disclose your personal data when you visit our website http://www.mckesson.eu/mck-de/karriere/ (hereafter: the "career portal").

#### 1. Controller

The Controller pursuant to data protection law is:

### McKesson Europe AG

Stockholmer Platz 1 70173 Stuttgart

Phone: +49 711 5001-00 Fax: +49 711 5001-1260 E-mail: service@mckesson.eu

#### 2. Data Protection Officer

Our Data Protection Officer will be happy to assist you with any concerns regarding data protection.

#### - Data Protection Officer -

McKesson Europe AG Stockholmer Platz 1 70173 Stuttgart

Phone: +49 711 5001-00 Fax: +49 711 5001-1260 E-mail: privacy@mckesson.eu

#### 3. Personal data

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is a data subject who can be identified, directly or indirectly, in particular by reference to an identifier. Identifiers can include, for example, a name, an identification number, location data, an online identifier, an IP address or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person (hereafter referred to jointly as "data").

### 4. Purposes and legal basis of data processing

### 4.1 General

We process your data in accordance with the provisions of the General Data Protection Regulation ("GDPR"), the German Federal Data Protection Act (*Bundesdatenschutzgesetz*, "BDSG"), and other applicable data protection provisions. Data are processed only insofar as is necessary and permitted under data protection law, for example to enable a visit to the career portal, to fulfil handling of applications, or to the extent that you consent to data processing. The purposes for which data are processed and the corresponding legal bases are set out below.

### 4.2 Informative use of the career portal and technical provision

You can visit our career portal without disclosing any personal details. If you are using our career portal solely to obtain information, we do not collect any of your data. The exception to this is data transmitted by your browser to enable you to visit the career portal, and information transmitted to us by cookies used.

From a technical perspective, in order for us to make this career portal available, we need to process certain automatically transmitted information about you, so that your browser will display our career portal and you are able to use the career portal. This information is automatically recorded each time our website is accessed, and stored in our server log files. This information relates to the computer system of the computer used to access the website. The following information is collected:

- IP address:
- Browser type/version (e.g.: Internet Explorer 6.0);
- Browser language (e.g.: German);
- Operating system used (e.g.: Windows XP);
- Resolution of the browser window;
- Screen resolution:
- Whether JavaScript is enabled;
- Java on/off;
- Cookies on/off;
- Colour depth;
- Time of access.

We also use cookies in order to make our career portal available to you. Cookies are text files that are stored in or by the internet browser when a website is accessed on your computer system. A cookie contains a string of characters that uniquely identify the browser in subsequent visits to the career portal. We use these cookies solely to make our website or career portal and their technical functions available to you. Almost all browsers allow all cookies to be blocked, existing cookies to be removed, or a cookie alert to be displayed to prevent them being placed on your device. More information about cookies can be found in the documentation, in the help file of your browser, or at www.aboutcookies.org.

Please be aware that blocking cookies may considerably impede the use of the website. Furthermore, we are unable to provide some functions of our website without the use of cookies.

The following information is stored in the cookies and shared with us:

Name	Description	Lifetime
PHPSESSID	This cookie serves to identify the user while they are using the career portal. The cookie is essential for correct functionality.	Session cookie (session)
REMEMBERME	This cookie is used to restore an expired session.	Persistent cookie (2 weeks)

We will not use your information that we have collected via the aforementioned cookies, which are necessary for technical purposes, in order to create user profiles or to analyse your surfing habits.

We process your data in order to make the technical functions of our website available to you on the following legal bases:

- As part of your application in accordance with § 26 BDSG, if you visit our career portal to inform yourself about vacancies, etc.; and
- For the purposes of our legitimate interests pursuant to Art. 6 para. 1 sentence 1 lit. f) GDPR, in order to enable us to make the career portal technically available to you. It is our legitimate interest to provide you an attractive, user-friendly, technically functioning website.

#### 4.3 Data sources and data

If you apply via our career portal, we will record the following data if and to the extent that you provide them to us:

- 1. Your first name, surname, e-mail address, and, if applicable, your title, residential address, phone number, date of birth, and nationality;
- 2. Your CV, and in particular information on your professional experience and training;
- 3. Qualifications, awards, and language abilities;
- 4. Your further expertise (such as Photoshop, Microsoft Office);
- 5. Answers to additional questions, depending on the respective job posting (such as driver's license);
- 6. Cover letter;
- 7. Files and documents you may upload.

Special categories of personal data may be included in the application documents. Special categories of personal data in terms of Article 9 GDPR, which relate to racial or ethnic origin, political opinions, religious beliefs (e. g. information regarding religious affiliation/confession) or philosophical beliefs or trade union membership, as well as the processing of biometric data for the purpose of clear identification (such as photographs), data concerning health (e. g. information regarding the severity of the disability), or data concerning a natural person's sex life or sexual orientation. If your CV contains special categories of personal data, we will assume that you provide them voluntarily and with your explicit consent.

In addition, we process the data that you send to us when you contact us by email.

### 4.4 Purposes and legal bases of data processing

We process your personal data for the following purposes and on the basis of the following legal grounds:

4.4.1 Data processing for making a decision regarding the establishment of an employment relationship, Article 88 para. 1 GDPR in conjunction with of Section 26 para. 1 BDSG.

If you apply to us, we process the data recorded in the context of the application procedure to execute the application procedure. In accordance with Article 88 para. 1 GDPR in conjunction with Section 26 para. 1 BDSG, data processing is permitted for reasons including making decisions about establishing an employment relationship.

We use the personal data you have provided to us in compliance with legal requirements as a basis for our decisions in the application procedure. For example, we use your professional qualification to decide whether we include you into a shortlist, or a personal impression in an interview to decide whether we will offer you the position for which you have applied.

4.4.2 Basic processing based on your consent in accordance with Article 88 para. 1 GDPR in conjunction with Section 26 para. 2 BDSG.

If you provide us with your consent for data processing, we process your data in accordance with Article 88 para. 1 GDPR in conjunction with Section 26 para. 2 BDSG.

In the context of the application procedure, you may for example decide whether we may store your data for longer in order to enable us to contact you directly in future in the event of an appropriate vacancy.

4.4.3 Data processing of special categories of personal data in terms of Article 9 para. 1 GDPR based on your consent in accordance with Article 88 para. 1 GDPR in conjunction with Article 26 para. 3 BDSG.

If as part of your application documents you voluntarily provide us with special categories of personal data as defined in Article 9 para. 1 GDPR (e. g. your photograph or information regarding your religious affiliation/confession), we will store these on the basis of your consent in accordance with Article 88 para. 1 GDPR in conjunction with the second sentence of Section 26 para. 3 BDSG. This also applies if you share other special categories of personal data with us in the further course of the application procedure.

By voluntarily sharing these data and accepting this data privacy statement, you consent to the storage of such special categories of personal data in the context of the application procedure.

We do not consider these special categories of personal data in selection decisions, unless legal obligations require these special personal data to be considered. For example, for some job postings it is possible that people with disabilities are given preferential treatment in compliance with applicable laws.

In these cases, the information is always voluntary and is provided with your explicit consent, which you have given through the voluntary transfer of this data and by accepting this data privacy statement.

### 5. Recipients of the data

The individuals within our company required in each case for the filling of vacancies have access to the personal data recorded in the context of the application, depending on which position(s) you have applied for. Your personal data is accessible to the respective HR managers in the company, and is made available to other selected managers on a case-by-case basis.

To the extent vacancies are in a department or function with a matrix organisational structure, your personal data are, as the case may be, also passed to human resources managers, subject-matter managers, or to other relevant managers in associated companies, to the extent this is necessary to properly process your application.

Incidentally, your data is passed on to external recipients in order to process contracts, if we are obliged by legal requirements to provide information or report or share data, or if you have consented to your data being shared with third parties or external service providers who act as processors on our behalf or who perform functions for us (e. g. IT service providers, service providers we use in the operation of our career portal online application tool, data centres, companies that destroy data, or courier services).

#### 6. Transfers to third countries

In principle, none of your personal data are transferred to countries outside of the European Union (EU) or the European Economic Area (EEA) or to international organisations. In the context of processing of applications regarding vacancies within a matrix organisational structure, data are, as the case may be, transferred to relevant affiliated companies outside of the EU or the EEA, to the extent this is necessary to properly process your application (see section 5 above). Such data transfers are based on adequacy decisions by the European Commission (Art. 45 GDPR) on standard data protection clauses/ standard contractual clauses on the basis of the templates adopted by the European Commission (Art. 46 paragraph 2 lit. c), paragraph 5 sentence 2 GDPR), or on a derogation according to Art. 49 GDPR.

# 7. Duration of storage

Session cookies installed by us are generally deleted after you leave our website, or the session cookie ceases to be valid when you close the browser. However, this does not apply for persistent cookies. These continue to be stored for a duration of two weeks after your visit of the career portal. You also have the option to delete installed cookies yourself at any time.

Personal data from declined applicants are stored for a maximum duration of four months, starting from the day that the application was declined. If in the course of your application procedure you have stated your consent to a longer storage period (generally one year), we store the data until the expiry of this timeframe or – if you withdraw your consent – until you state your revocation of consent.

Longer storage periods may result from data being necessary for the assertion, exercise or defence of legal claims, or the existence of a statutory retention periods. Such data are only stored for as long as it is necessary to fulfil these purposes.

### 8. Your rights as a data subject

You may assert your rights listed below against the entity named in Section 1 at any time.

### 8.1 Right of access

You are entitled, pursuant to Art. 15 GDPR, to obtain following information from us at any time and free of charge: your data we process, the purposes of the processing, the categories of recipients, the envisaged period for which the data will be stored or, in the case of a transfer to a third country, the appropriate safeguards. You are also entitled to obtain a copy of your data.

# 8.2 Right to rectification, erasure, restriction of processing

Should your data we process be inaccurate or incomplete or if their processing is unlawful, you can request that we rectify, supplement or restrict the processing of your data, or erase these data to the extent permitted by law, Art. 16, 17 and 18 GDPR.

There is no right to erasure if the processing of personal data is necessary (i) for the exercise of the right of freedom of expression and information, (ii) for compliance with a legal obligation to which we are subject (e. g. statutory retention periods), or (iii) for the assertion, exercise or defence of legal claims.

# 8.3 Right to data portability

If you have provided us with your data on the basis of your consent or as part of an existing contractual relationship with us, we will, at your request, make the data available to you in a structured, commonly used and machine-readable format, or, where technically feasible, will transmit them to a third party named by you.

# 8.4 Right to object

If we process your data in order to pursue a legitimate interest, you may object to such processing on grounds relating to your particular situation, Art. 21 GDPR. The right to object may be exercised only within the limits set by Art. 21 GDPR. Moreover, our interests may override the cessation of processing, meaning that, despite your objection, we are entitled to process your personal data.

# 8.5 Right to lodge a complaint

You are welcome to contact our Data Protection Officer (contact details in Section 2) with any questions, suggestions and criticisms.

You are also entitled, according to Art. 77 GDPR, to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or place of the alleged infringement, if you consider that the processing of personal data

relating to you infringes the GDPR. The right to lodge a complaint applies regardless of any other administrative or judicial remedies.

The supervisory authority responsible for us is:

The State Data Protection and Freedom of Information Officer Postfach 10 29 32 70025 Stuttgart

Phone: +49 711 615541-0 Fax: +49 711 615541-15 E-mail: poststelle@lfdi.bwl.de

We recommend, however, that you at first always lodge a complaint with our data protection officer.

# 9. Obligation to provide data

In principle, you are under no obligation to provide us with data. However, if you do not provide us with data, we cannot make our career portal available to you or process your application or enquiries that you send us.

## 10. Automated decision-making/profiling

No automated decision-making takes place. If need be, we may process your data with the aim of evaluating certain personal aspects (profiling). In particular, we may, if need be, use evaluation tools to enable us to provide you with appropriate information and advice on products. These enable us to design our products, communication and advertising to meet your needs and to engage in market research and opinion polling.

# 11. Consent/rights of withdrawal

In the event that you give or have given us your consent to the collection, processing or use of your data, you can withdraw this consent at any time by notifying the entity named in Section 1. An e-mail is sufficient.

You also have the right, on grounds relating to your particular situation, to object to the processing of data concerning you on the basis of Art. 6 para. 1 sentence 1 lit. e) GDPR (performance of a task carried out in the public interest) or Art. 6. para. 1 sentence 1 lit. f) GDPR (legitimate interests pursued by the controller); the same applies to profiling pursuant to these provisions. In this event, we will no longer process the data concerning you, unless we either can demonstrate compelling and legitimate grounds for processing that override your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims.

If the data concerning you are processed in order to engage in direct marketing, you have the right to object at any time to the processing of these data for the purposes of such marketing. If you object to the processing for direct marketing purposes, the data will no longer be processed for those purposes.

### Please send any notification of withdrawal to the address indicated in Section 1.

### 12. Amendments

We reserve the right to amend this privacy statement at any time. Any changes will be announced by the publication of the revised privacy statement on our website. Unless specified to the contrary, such amendments take effect immediately. Please, therefore, regularly check this privacy statement to make sure you are aware of the latest version.

Last updated in July 2020