

Quad/Graphics Europe – Candidate Privacy Notice

Last modified: May 25, 2018

Introduction

Quad/Graphics Europe (“QGE”) is committed to protecting the privacy and security of your personal data. This Candidate Privacy Notice applies only to the personal data of job applicants (or “candidates”) seeking employment with QGE. It does not apply to our employees, contractors or clients, or other personal data that QGE collects for other purposes. You are receiving a copy of this Notice because you are applying for work with us.

This Notice describes how we collect and process personal data about you during the application and recruitment process. Specifically, the Notice discusses the categories of personal data that we collect, that we may receive from our U.S.-based parent company, Quad/Graphics, Inc. and other third parties in connection with your application for employment and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Notice also describes the rights you have and control you can exercise in relation to your personal data that we maintain.

We will only process your personal data in accordance with this Notice unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes. QGE processes candidate personal data for recruitment and hiring purposes. Once a candidate is hired by QGE, that employee’s personal data for the duration of his or her employment with us is covered by QGE’s Employee Privacy Notice.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. This Notice may change from time to time (see Changes to This Notice).

Data Controller and Representative

QGE is the controller of your personal data collected and processed as part of your application and recruitment process. This means that we are responsible for deciding how we hold and use personal data about you. In certain instances, Quad/Graphics, Inc., the parent company of QGE, is also a controller under applicable international, federal, state,



or local privacy laws, including the EU General Data Protection Regulation.

Collecting Your Personal Data

For purposes of this Notice, personal data means information that identifies job candidates for employment with us, either submitted directly to us or through alternative channels (for example, a third-party recruiting agency) and is collected in connection with QGE's application and recruiting process.

QGE may collect personal data directly from you, as a job candidate, or may receive personal data from third parties, for example, in connection with a background, employment, or reference check, subject to your consent where required by law. Personal data excludes anonymous or de-identified data that is not associated with a particular individual.

We collect, store, and use the following categories of personal data in connection with our recruiting activities:

- Personal contact details, such as name, title, date of birth, residential address, telephone number, and personal email address.
- Information on education, skills/qualifications, experience and employment history (graduated schools or studies, completed trainings and courses, previous employers, official positions and job descriptions) and other relevant information provided on a curriculum vitae (CV), cover letter, and job application form.
- Information collected during phone screenings and interviews.
- Reference information and information received from background checks, where applicable, including information provided by third parties.

How is Your Personal Data Collected?

We usually collect personal data from you directly when you apply for a position with us (for example, through your formal submission of our application form and related materials including your CV and cover letter). We also may collect personal data about you from third parties, such as a recruitment agency, your references, prior employers, employees with whom you have interviewed, and employment background check providers, to the extent this is permitted by applicable law.



Purpose and Lawful Basis for Processing Your Personal Data

We only process your personal data where applicable law permits or requires it in connection with carrying out our application and recruitment process, in order to take steps at your request prior to entering into an employment contract with you, to comply with a legal obligation that applies to us, for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, and with your consent if applicable law requires us to obtain your consent.

- Legitimate Interests. We will process your personal data for the purposes of our (or a third party's) legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. Our legitimate interests include:
 - Identifying and evaluating candidates, including assessing skills, qualifications and interests, for the purposes of determining suitability for the position applied for.
 - The running and management of our business, which includes analysing and improving our application and recruitment process by keeping records related to our hiring processes.
- Taking Steps Necessary Prior to Entering into Your Employment Contract. We process your personal data in order to take the necessary steps prior to entering into any contract with you (such as an employment contract), which include:
 - Verifying your information and carrying out employment, background, and reference checks, as permitted by applicable law.
 - Communicating with you about the recruitment process and your application.
- Compliance with a Legal Obligation. We may also process your personal data when we are required or permitted to by law. Specifically, we may process your personal data for the following purposes:
 - Complying with legal and regulatory requirements under EU and applicable national law(s) in connection with our application, recruiting and hiring processes.



- To comply with government inspection, audits, reporting requirements, and other valid requests from government or other public authorities.
- To respond to legal process such as subpoenas; or as necessary for us to protect our interests or otherwise pursue our legal rights and remedies (for instance, responding to and defending against legal claims arising brought by candidates), defend litigation, and manage complaints or claims.

- Consent. We may, from time to time, request your consent to process your personal data in a manner not described above. The purpose and nature of this processing will be described at the time we seek your consent. Except in extreme cases that require immediate processing, your consent is completely optional and you are under no obligation to provide consent.

If your application is unsuccessful, we may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose and you have the right to withdraw your consent at any time.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

Collection and Processing of Special Categories of Personal Data

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether accommodations need to be made.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Where we have a legitimate need to process special categories of personal data about you for purposes not identified above, we will only



do so only after providing you with notice and, if required by law, obtaining your prior, explicit consent.

Automated Decisions Making

You will not be subject to hiring decisions based solely on automated data processing under any circumstances. All decisions taken in relation to you have some human intervention in the decisions taken.

Data Sharing

We will only share your personal information with the following third parties (listed below) for the purposes of processing your application. All of our third party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

These third-party service providers may be located outside of your home jurisdiction include:

- IT providers such as disaster recovery management systems, storage back-up providers for QGE's critical servers, archive storage providers, cloud storage and file sharing websites, client relationship management systems, in order to protect our legitimate business interests and comply with applicable laws and regulations.

Your Rights Regarding Your Information and Accessing and Correcting Your Information

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your employment.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.



- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact at daneosobowe@quadgraphics.pl.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Data Security

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need



for such access. Our information security program is periodically audited by independent third parties across our primary lines of business, including our data centers, and is governed by an information security policy.

Sharing Your Personal Data Internationally [in the United States/In Other Countries Outside the European Economic Area]

If you are a resident of the European Economic Area (“**EEA**”), in order to provide you with employment, we may send and store your personal data outside of the EEA, including to the United States. Accordingly, your personal data may be transferred outside the country where you reside or are located, including to countries that may not or do not provide an adequate level of protection for your personal data. Your personal data is transferred by QGE to another country only if it is required or permitted under applicable data protection law and provided that there are appropriate safeguards in place to protect your personal data. To ensure your personal data is treated in accordance with this Notice, QGE uses Data Protection Agreements between Quad/Graphics and all other recipients of your data. Where applicable, these Data Protection Agreements include the Standard Contractual Clauses adopted by the European Commission.

Data Retention Periods

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

To determine the appropriate retention period for personal data, we consider our statutory obligations, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes we process your personal data for, and whether we can achieve those purposes through other means. We specify the retention periods for your personal data in our records management policy.

If you are offered and accept employment with QGE, the personal data we collected during the application and recruitment process will become part of your employment record, and we may use it in connection with your employment consistent with our employee personal data policies.

If you are not offered employment with QGE, we will retain your personal data for a period of two years after we have communicated to you our employment decision. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and



that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

Changes to This Privacy Notice

We reserve the right to update this Notice at any time, and we will provide you with a new Notice when we make any updates that would affect your data that we still maintain. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice by e-mail and/or inter-office mail and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent only where required by applicable law or regulation.

Contact Information

If you have any questions, concerns, complaints or suggestions regarding our Privacy Notice, have any requests related to your personal data pursuant to applicable laws, or otherwise need to contact us, please contact daneosobowe@quadgraphics.pl.

You also have the right to lodge a complaint with the applicable supervisory authority in the country you live in, the country you work in, or the country where you believe your rights under applicable data protection laws have been violated. However, before doing so, we request that you contact us directly in order to give us an opportunity to work directly with you to resolve any concerns about your privacy.