

INFORMATION NOTICE
CONCERNING THE PROCESSING OF PERSONAL DATA
BY Garmin Cluj S.R.L.

Effective Date: 1 11 2021

This Information Notice concerning the processing of personal data is to inform you, as a candidate at Garmin Cluj S.R.L. ("Garmin"), about the processing of your personal data. The data controller is Garmin Cluj S.R.L., having its registered office in 33-35-37 Calea Dorobantilor Street, Cluj-Napoca, Cluj County, registered with the Trade Register Office of Cluj under no. J12/2398/2006, having sole registration no. RO 18850101.

Categories of Personal Data

We may process the following personal data:

- Data related to recruitment:
 - identification information: surname and given name, telephone number, email address, date of birth, native country, nationality, address (domicile/residence), sex.
 - resume/CV content: education, certifications or licensure, employment history, qualifications, skills and work experience, interview details, comments and notes, and psychometric profiling assessments.
- Data required for legal requirements or activities and benefits, such as name, gender, marital status, family members, date of birth, country of birth, citizenship, nationality, national identification number or other equivalent, government-issued identifiers (e.g., national insurance number, social security number), psychometric assessments, data on health status, data on criminal record (if requested in the recruitment process)
- Data related to legal issues, proceedings, or filings.

Legal Grounds for Processing

The legal grounds for processing personal data of candidates are legitimate interests, which include evaluating whether the candidate is qualified for the position, verifying the candidate's experience and work history, or defending legal claims; legal obligations; consent (as detailed below in the "Retention of Personal Data" section); and, where an offer of employment has been made, contractual necessity.

Purposes of Processing

We use personal data of candidates for the following purposes:

- As required or expressly authorised by laws, regulations, or judicial authorisations applicable to Garmin's business or by government agencies that oversee or regulate our business;
- Background checks and verifications of references and qualifications, to the extent allowed under applicable law;
- Communications, including video conferencing;
- Compliance with various legal and regulatory obligations;

- Immigration filings and requirements;
- Legal proceedings and government investigations, including preservation of relevant data and use of data to defend and pursue legal claims;
- Problem resolution (e.g., internal reviews, grievances, issue resolution, etc.), internal investigations, auditing, compliance, and risk management;
- Provision of legal advice and review;
- Relocation; and
- Staffing (e.g., headcount planning, recruitment, termination, succession planning).

Transfer of Personal Data to Other Garmin Companies

Garmin may transfer personal data of candidates to other Garmin group companies (<https://www.garmin.com/legal/garmin-companies/>), including affiliated companies in the United States, as needed for the purposes listed above. Only the personal data that is necessary to accomplish these purposes will be transferred to other Garmin group companies.

Garmin will take appropriate technical and organisational actions to protect the processing of the transferred personal data against accidental or unlawful destruction, loss, alteration, disclosure, or unauthorised access, and any other form of unauthorised processing.

Where Garmin transfers personal data to other Garmin group companies, these transfers are governed by an intercompany data processing and transfer agreement that includes European Commission-approved model contractual clauses where required.

Categories of Recipients of Personal Data

To help increase business efficiency, we may use third-party service providers to help us operate our business or to administer activities on our behalf, such as data storage and cloud-based human resource information systems. We may share personal data about you with such third-party service providers for the sole purpose of enabling them to perform their services. We require our service providers to respect and maintain the confidentiality of your personal data with appropriate security measures and permit them to process personal data only as we have authorised.

We may disclose personal data about you to others: (a) if we have your valid consent to do so; (b) to comply with a valid subpoena, legal order, court order, legal process, or other legal obligation; (c) to enforce any of our terms and conditions or policies; or (d) as necessary to pursue available legal remedies or defend legal claims. We may also transfer your personal data to an affiliate, a subsidiary or a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Garmin's business, assets or stock, including, without limitation, in connection with any bankruptcy or similar proceeding, provided that any such entity that we transfer personal data to will not be permitted to process your personal data other than as described in this Information Notice without providing you notice and, if required by applicable laws, obtaining your consent.

Retention of Personal Data

We will retain personal data of all candidates as long as required to satisfy legal obligations and to complete the recruitment process.

We will retain personal data of unsuccessful candidates [following consent from the candidate] up to three (3) years after the candidate was notified that their application was unsuccessful or upon our last interaction with them.

In the event that a candidate is unsuccessful, but Garmin feel that the candidate has the potential to be suitable for a future opportunity with the company, we will retain the candidate's personal data up to three (3) years [following consent from the candidate]. To revoke this consent, please send your request to the contact details in the "Your Rights" section.

In the event that a candidate rejects an offer of employment with the company, the company will retain the candidate personal data up to three (3) years after the proposed employment effective date [following consent from the candidate].

In case that the candidate becomes a Garmin employee, the candidate personal data may be included with the employee personal data as appropriate.

Your Rights

Subject to the limitation provided in applicable laws, you have the following rights in relation to the processing of your personal data:

- (i) the right to be informed about the processing of your personal data;
- (ii) the right to request access to your personal data;
- (iii) the right to request the rectification or erasure of your personal data;
- (iv) the right to object to the processing of your personal data;
- (v) the right to request the portability of your personal data; and
- (vi) the right to lodge a complaint with a supervisory authority.

If you wish to exercise these rights, you may use one of the options below:

- request for your data to be deleted, from the option provided to you in the e-mail received from the recruitment platform, upon your application;
- reply to the recruiter you have been in touch with, over e-mail, via the recruitment platform, and specify your request;
- send a written request to:

Garmin Cluj S.R.L.

Attention: Human Resources

Address: 33-35-37 Dorobantilor Street, Cluj-Napoca, Cluj County, Romania

E-mail: #CLU-Privacy@garmin.com