

Data Privacy Information Leadership Quality Gates (LQGs)

Last revised: 01.09.2024

The following information is intended to give you an overview of the processing of your personal data as part of carrying out Leadership Quality Gates (LQGs) in international entities and your rights under data protection law.

1. What is your data processed for (purpose of processing) and on what legal basis?

Personal data are required and processed for the execution of LQGs and the fulfillment of the associated contractual obligations. The data is processed in accordance with the provisions of the European General Data Protection Regulation (GDPR). The legal basis for the processing of your personal data within the frame of LQGs is Art. 6 Para. 1 b GDPR, and, for subsequent customer satisfaction survey, Art 6, Para. 1 of the GDPR (see 2c).

Objectives of Leadership Quality Gates (LQGs)

With the LQGs, Deutsche Telekom has introduced a standardized process for filling management positions at the two most important management groups. Internal and external candidates must pass an LQG. Therefore, LQGs are part of the application process for (internal and external) candidates applying for their first disciplinary management or executive position. The aim of the LQGs is to ensure management quality within the company on the basis of an objective assessment of management and leadership competencies based on standard requirement profiles.

2. Which data are processed?

a) The following data are collected and processed by the HR departments of DTAG. They may be used for preparing / conducting the LQG-procedure and for quality assurance purposes, taking into account the relevant Workers Council Agreement (WCA).

- General personal data (name, date of birth, e-mail address, gender)
- CV
- Result of the LQGs (suitable, suitable with need for development, not suitable)
- Result report (including evaluation of leadership and management competencies using DTAG's competency model and areas of development)

b) The following data may be forwarded to other hiring managers or hiring HR-BPs throughout the group during later applications:

- General personal data (see above)
- Result of the LQGs (suitable, suitable with need for development, not suitable)



- The validity period of positive procedure results (usually 24 months) or the procedure lock in the event of negative results (usually 12 months).

c) Systematic customer satisfaction surveys (user surveys) are performed to ensure and improve quality. If these surveys are coordinated and conducted in accordance with the applicable regulations and procedures of Group Data Privacy and the relevant workers council agreements (WCA), the following user data may be used for specific purposes for customer satisfaction surveys:

- Name
- E-mail address

3. Who will get access to my data?

Within Deutsche Telekom, those departments will have access to your data that need those data to fulfill our contractual and legal obligations. Service providers and vicarious agents working for us may also receive data for these purposes. If such partner companies come into contact with personal data of our employees, this takes place within the scope of a so-called contract data processing, which is expressly provided for by law (§ 28 of the GDPR). Deutsche Telekom remains responsible for the protection of your data even in this case. When working with your data, the partner must follow our instructions at all times. To ensure that this is the case, we have put in place strict contractual regulations and carry out technical and organizational measures and extra checks. Our partners are companies from the following categories: HR service providers, advising and consulting, service providers for the implementation of aptitude diagnostic procedures.

The following parties receive general personal data (see 2a, taking into account the relevant Workers Council Agreement (WCA)):

- Deutsche Telekom Services Europe (DTSE) for organizing the LQGs
- DT AG Talent Acquisition and Sourcing (TAS) in order to moderate and take over product responsibility (internal) and, if applicable, the external providers TAS uses for moderation
- Party commissioning the procedure and the HR-BP
- The observers from DTAG &
- local workers council (WC), if necessary
- If appropriate (during later applications), other hiring managers in the Group to whom the applicant sends an application within the validity period of the LQGs, and HR-BPs.

The following parties receive the results of the LQG, including the validity period or duration of the procedure lock (taking into account the relevant Workers Council Agreement (WCA)):

- Party commissioning the procedure
- The hiring HR-BP and the WC if applicable
- DTSE Dispatching and TAS in order to manage and store the data

- TAS for Quality assurance purposes
- If appropriate, other hiring managers and HR-BPs within the Group (see Item 2b)

The following parties receive the result report created by the moderator (taking into account the relevant WCA):

- Party commissioning the procedure
- If appropriate, the hiring HR-BP
- DTSE Dispatching and TAS in order to manage and store the data

4. How long will my data be stored?

Your personal data is processed and stored as long as it is necessary for the fulfillment of our contractual and legal obligations.

Your personal data and the result report are stored in TAS in compliance with the applicable data protection regulations. They are deleted automatically after a period of 24 months at the latest. Your result report is deleted automatically after a period of 6 months at the latest.

5. Is data transmitted to a third country?

As a matter of principle, your data will be processed in Germany and other European countries.

If, in exceptional cases, your data are also processed in countries outside of the European Union (i.e., in so-called third countries), this is permissible if the European Commission has decided that third country ensures an adequate level of protection (Article 45 GDPR). If the Commission has not made such a decision, Deutsche Telekom or the service provider may transfer personal data to a third country only if appropriate safeguards are provided for an adequate level of protection. Deutsche Telekom uses the standard data protection clauses recognized by the European Commission as a safeguard, and our Binding Corporate Rules Privacy for data transfer within the Group. You can find both of them at: www.telekom.com/en/corporate-responsibility/data-protection-data-security/news/laws-and-corporate-rules-443956

6. What data privacy rights do I have?

- a) Right to request information (on the categories of the personal data processed, the purposes of the processing, any recipients of the data, the envisaged storage period)
- b) Right to request that inaccurate or incomplete data be rectified or supplemented
- c) Right to withdraw consent at any time with effect for the future
- d) Right to object in the case of data processing on account of legitimate interests
- e) Right to request that data be erased, provided that
 - the data is no longer required for the intended purpose and/or is being unlawfully processed, or

- you withdraw consent (unless there is another legal ground for the processing), or
- in the case of data processing on account of legitimate interests you object to the processing and there are no overriding legitimate interests for the processing, or
- data has been unlawfully processed, or
- the personal data has to be erased for compliance with a legal obligation
- f) Right to demand under certain circumstances the restriction of data processing where erasure as per e) is not possible or the erasure obligation is disputed
- g) Right to data portability subject to the conditions of Art. 20 of the GDPR
- h) Right to lodge a complaint with the responsible data protection supervisory authority regarding the processing of data

7. Is there an obligation for me to provide data?

As part of the LQG, you must provide personal data which are required for the execution of the LQG and the fulfillment of related contractual obligations, or which we are legally obliged to collect.

8. Who is responsible for data processing and whom can I contact?

The Deutsche Telekom company with which you have an employment contract or to which you are applying is responsible for data.

If you have any questions on the processing of your data within the LQGs, please contact Julia Stein, TAS: hr-diagnostics@telekom.de.

Data Privacy Officer at Deutsche Telekom AG is Dr. Claus D. Ulmer, Friedrich-Ebert-Allee 140, 53113 Bonn.

Please find the respective Data Privacy Officer for your own entity here:

<https://yam-united.telekom.com/pages/group-privacy/apps/content/kontakt>

