# **Privacy Statement**

### Information Concerning the softgarden Applicant Management System

## (1) Job Newsletter Subscription

In order to receive information about new job offers, you can subscribe to the job newsletter or view suitable jobs on our career board (RSS feed). You can customize your subscription in a more detailed manner by specifying the job(s) you are interested in as well as the job location(s).

In order to subscribe to the newsletter, you will also need to provide your e-mail address. The legal basis for such action lies in your consent to receive the newsletter, in accordance with Art. 6 Para. 1 lit. a of the GDPR. You may revoke your consent to receive the newsletter at any time via the unsubscribe link provided in the newsletter (opt out).

No personal data is processed via the RSS feed itself for the purpose of informing you about new job advertisements.

## (2) softgarden Network

In order to manage your applications more easily and efficiently, registration for the softgarden network and the creation of an account for this purpose is offered by softgarden. The softgarden network is a cross-customer talent pool.

Your network account can be individually configured, and your application status can also be viewed. The following information can be entered:

- salutation, last name, first name, and date of birth
- profile picture
- contact details (e.g., e-mail address and telephone number)
- application documents (e.g., CV, qualifications, work experience, and language skills)
- areas of interest (job category, career level, and desired location)

The legal basis for the creation of the softgarden network account is your consent, in accordance with Art. 6 Para. 1 lit. a) of the GDPR. For more information on the softgarden network, please visit <a href="https://softgarden.de/unternehmen/datenschutz-network/">https://softgarden.de/unternehmen/datenschutz-network/</a>.

#### (3) Salary Statistics Module

softgarden will give you the opportunity to provide feedback regarding your salary expectations and salaries offered to you during various steps of the application process. The information provided in this context will be processed anonymously and without any link to your name or contact details. softgarden anonymously processes such data for its own purposes (statistics, analysis, studies) and serves as the controller of such processing within the meaning of Art. 4 No. 7 of the GDPR.

Such processing shall only take place with your consent by means of participation and on a purely voluntary basis. The legal basis is Art. 6 para. 1 p. 1 lit. a) of the GDPR.

### (4) Social Share Buttons

Sharing of the job advertisements on various social networks is possible. To that end, different buttons have been made available for each network. After clicking on one of the buttons, you will be directed to the respective network and will subsequently be taken to the respective login page. The buttons do not serve as plug-ins and do not transmit any personal data directly to the operators of the social networks.

Job advertisements can currently be shared on the following social networks:

- Facebook ( <a href="https://de-de.facebook.com/privacy/explanation">https://de-de.facebook.com/privacy/explanation</a> )
- Twitter ( <a href="https://twitter.com/de/privacy">https://twitter.com/de/privacy</a>)
- LinkedIn ( <u>https://www.linkedin.com/legal/privacy-policy?trk=uno-reg-join-privacy-policy</u> )
- Xing ( <a href="https://privacy.xing.com/de/datenschutzerklaerung">https://privacy.xing.com/de/datenschutzerklaerung</a> )

The legal basis for the statistical analysis and coverage measurement of job advertisements is Art. 6 para. 1 lit. f) of the GDPR. A personal reference is not established.

In addition, you can find out how the aforementioned social networks process your personal data via the links provided. We have no influence on how your personal data is processed by said social networks.

# (5) Online Surveys

At the end of the application process, you may be given an opportunity to take part in a survey provided by softgarden via a link. The survey, which is conducted by easyfeedback GmbH, is used to query the application experience. softgarden carries out the survey in its capacity as the data controller within the meaning of Art. 4 No. 7 of the GDPR and anonymously processes the collected data for its own purposes (statistics, analysis, studies) as well as for the further development of softgarden products.

The collection of survey data is secured by default via the SSL encryption process and no personal reference is established by softgarden during the course of processing. The survey can be terminated at any time. Any data processed up to the point of termination may be used for the aforementioned purposes.

Your participation in the survey is purely voluntary, and by participating, you declare your consent, without which your participation would not be possible, pursuant to Art. 6 Para. 1 lit. a) of the GDPR. The processing of the data is anonymized. As a result, anonymized data is not subject to the material scope of application of the GDPR.

Additional information on the data protection policy of easyfeedback can be found via the following link: <a href="https://easy-feedback.de/privacy/datenschutzerklaerung">https://easy-feedback.de/privacy/datenschutzerklaerung</a>.

# (6) Talent Pool

As part of your application or via the "Contact" button, you have the opportunity to recommend yourself to be included in our talent pool. Processing is necessary in order to be automatically considered for further job postings, that is, for similar or otherwise suitable positions.

If you register for the talent pool via the "Contact" button, the following information will be requested:

- salutation, academic title (optional)
- first name, last name, email address
- job field(s) of interest
- current career stage
- preferred location(s)
- XING profile or CV

Inclusion in the talent pool takes place on a purely voluntary basis, with your consent, and through the use of an opt-in link. The legal basis is Art. 6 para. 1 lit. a) of the GDPR. In addition, we will contact you after a period of six months to find out whether you would still like to be part of the talent pool.

## (7) "Cammio" Video Interview

We use a platform operated by Cammio GmbH, Philipp-Franck-Weg 19, 14109 Berlin, to conduct delayed video interviews. The applicant receives an invitation to a video interview via a link to the Cammio platform. At that point, the applicant's last name, first name, and e-mail address are transmitted to Cammio GmbH and processed there. The interview and the processing of the video data also take place on servers belonging to Cammio GmbH.

The duration of the storage of your data is linked to the duration of the storage of your other applicant data.

Participation is voluntary and subject to your consent, which is granted via your participation. The legal basis for the consent is Art. 6 para. 1 lit. a DSGVO. Processing is carried out for the purpose of efficient and clear handling of the application process as well as the provision of a digital interview opportunity.

Cammio GmbH functions as our order processor, is controlled by us, and is subject to our instructions. A contract for data processing has been concluded with the provider, which ensures lawful processing by Cammio.

Should you not be interested in conducting a video interview, you will not find yourself at a disadvantage as a result. In such a case, please contact us to allow us to find an adequate alternative.

# (8) "Jitsi" Video Interview

We use "Jitsi", a video conferencing service that has been integrated into the system, to conduct conferences and interviews. A direct so-called "peer-to-peer connection" is established between the participants, thereby ensuring that no video interviews or personal data are recorded or stored by the system. The softgarden server only serves as an intermediary. Participation in a video interview is

voluntary and is based on your consent, pursuant to Art. 6 Para. 1 lit. a of the GDPR, unless such participation is necessary for the execution of the application, in accordance with Article 26 of the German Federal Data Protection Act.

# (9) "Cronofy" Appointment Scheduling / Calendar Integration

We use an integrated service provided by Cronofy Limited, 9a Beck Street, Nottingham, NG1 1EQ, UK for the purpose of scheduling appointments and extending appointment invitations.

In the event that we invite you to an interview via this feature, you will receive an appointment invitation via email, generated by Cronofy. As a result, your e-mail address as well as the title of the appointment, a description, and the location where the appointment is scheduled to take place will be transmitted. No further personal data will be transmitted to Cronofy beyond that.

The legal basis for the processing is Art. 6 (1) lit. f of the GDPR, in order to integrate appointment scheduling into our applicant management system and to plan and manage job interviews and other appointments more efficiently.

Data processing takes place in an encrypted manner and in an isolated environment on a server in Germany. Data transfer to third countries (USA) cannot be ruled out in this context. Adequate security standards for data processing have been agreed with and proven by the provider. Additional information can be found at the following link: Scheduling Platform for Business | Cronofy the Scheduling Experts

However, if you do not wish to have your data processed by Cronofy or would like to receive further information, please indicate such details prior to the appointment coordination.

# (10) "Textkernel" CV Parsing

We process and analyze the documents that you upload using AI in order to extract CV data and convert it to a structured form (so-called "CV parsing").

To ensure data subject rights and security standards, a contract for order processing has been concluded with the service provider. The order processor is Textkernel B.V. Nieuwendammerkade 26 A 5, (1022AB) Amsterdam, Netherlands, an ISO27001-certified provider. Data processing takes place on a server in Germany and in a secure environment.

The legal basis for the processing is Article 26 (1) of the German Federal Data Protection Act and Art. 6 (1) sentence 1 lit. f) of the GDPR, in order to initiate an employment relationship and to make the application process efficient for you. Personal data will not be transferred to non-secure third countries. Your data is routinely deleted from the cache one time per week.

### **Article 8 Third-country Transfer**

Please note that your data may be processed in the USA. While Google has outsourced a large number of its services (Analytics, Webfonts, Maps) to European servers, it cannot be ruled out that US authorities may be able to access your data on the basis of local legislation, without sufficient legal protection options being available to them. Therefore, your consent will be requested before such services are activated or the corresponding cookies are stored. Should you not wish for that to

happen, you can refuse to grant consent in that regard. In such a case, only technically necessary cookies will be stored; the services in question will not be activated.

## **Article 9 YouTube Videos**

- (1) We have integrated YouTube videos into our online offer, which are stored on www.youtube.com and can be played directly via our website. They are all integrated in "extended data protection mode", i.e., no data about you as a user is transmitted to YouTube if you do not play the videos. The data mentioned in paragraph 2 will only be transmitted if you play the videos. We have no influence on such data transmission. The legal basis for the collection is your consent, pursuant to Art. 6 I 1 a) of the GDPR.
- (2) When playing a video, YouTube receives information indicating that you have accessed the corresponding sub-page of our website. In addition, the data mentioned under Article 3 of this policy is transmitted. That occurs regardless of whether YouTube provides a user account via which you are logged in or whether no user account exists. If you are logged in to Google, your data will be directly assigned to your account. If you do not want the data to be associated with your YouTube profile, you will need to log out before clicking on the button. YouTube stores your data as usage profiles and uses it for the purposes of advertising, market research, and/or the demand-oriented design of its website. Such an evaluation is carried out, in particular (even for users who are not logged in), to provide needs-based advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of such user profiles.
- (3) For more information on the purpose and scope of data collection and its processing by YouTube, please refer to the privacy policy. The policy will also provide further information on your rights and setting options with respect to the protection of your privacy:

https://www.google.de/intl/de/policies/privacy and

https://policies.google.com/technologies/types?hl=de. Google also processes your personal data in the USA. The legal basis for carrying out a data transfer is your express consent, in accordance with Art. 49 I 1 a) of the GDPR.