



## Privacy Policy Career Page

The protection and confidentiality of your personal data is of particular importance to us. To ensure the protection of your personal data, we have taken technical and organizational measures to comply with data protection regulations. This privacy policy provides information about how we collect personal data during the application process and for what purpose the process is. Your data will be processed in accordance with this privacy policy and the applicable data protection regulations. This privacy policy applies to the career portal and the applicant management system of FGS Global (Europe) GmbH.

### 1 Name and contact details of the controller

Controller pursuant to Art. 4 No. 7 of the General Data Protection Regulation (hereinafter: "GDPR") is FGS Global (Europe) GmbH, Speditionsstraße 2, 40221 Düsseldorf, [privacy@fgsglobal.com](mailto:privacy@fgsglobal.com).

### 2 Data protection officer

If you have any questions about data protection, please contact FGS Global (Europe) GmbH, Speditionsstraße 2, 40221 Düsseldorf, [privacy@fgsglobal.com](mailto:privacy@fgsglobal.com).

### 3 Order processing

For the efficient execution of application procedures, we use an applicant management system from Greenhouse Software Inc. ("**Greenhouse**") 228 Park Avenue S. PMB 14744 Attn: Privacy, New York, New York\_10003-1502 USA, which operates applicant management as a processor within the meaning of Art. 4 No. 8 GDPR. A contract for order processing in accordance with Art. 28 GDPR has been concluded with the provider, which ensures compliance with data protection regulations.

We remain your first point of contact for exercising your rights as a data subject and for handling the application process, we remain your first point of contact. You can contact us directly using the details provided above of the controller or, if specified, confidentially to the data protection officer.

### 4 Subject matter of data protection

The subject of data protection is the processing of personal data, in this case the context of applicant management. According to Art. 4 No. 1 GDPR, this includes all information relating to an identified or identifiable natural person (hereinafter referred to as the hereinafter referred to as the "data subject") that is required for the application process and the initiation of an employment relationship, Art. 6 I b) GDPR. In addition, when using the applicant management system, data is also collected data that is related to the use, so-called usage data. Usage data is data that is necessary to operate our websites, such as information about the start, end, and scope of use of our website, including login data. This processing is in accordance with data protection and telemedia law provisions. As part of the application process and/or the use of the system, processing activities may also take place processing activities may also take place that are either based on legitimate interest pursuant to Art. 6 (1) (f) GDPR or on the basis of your consent pursuant to Art. 6 (1) (a) GDPR. Processing activities that are subject to a legal obligation to process or a public interest, Art. 6 (1) lit. c) and e) GDPR, such as in the context of criminal prosecution or investigation by state authorities agencies. You can change the scope of the corresponding cookie settings, and your user behavior, you can determine and control the scope of processing yourself and control it.

## 5 Collection and use of your data

### 5.1 Visiting the website

We process server log data to ensure availability and security (Art. 6 (1) (f) GDPR). Storage generally takes place for a few days and is only extended for evidentiary purposes if necessary. The use of necessary technical means on your end device is based on Section 25 (2) No. 2 TDDDG (technically necessary). When you access the career portal, your internet browser automatically transmits the following data:

- Date and time of access,
- browser type and version,
- Operating system used,
- Amount of data sent.
- IP address of access

This data is not used for direct assignment within the framework of applicant management and will be deleted in a timely manner in accordance with the legitimate retention periods in a timely manner, provided that no longer storage is required for legal or factual reasons, such as for evidence, no longer storage is required. In individual cases, retention for the purposes mentioned may be considered.

Greenhouse uses the services of Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855, Luxembourg, and Fastly, Inc., 475 Brannan St., Suite 300 San Francisco, CA 94107, USA (US Adequacy Decision, EU-US Data Privacy Framework) to securely host, quickly load, and properly deliver Greenhouse's pages and features.

### 5.2 Reading and storing information on the end device

We integrate various services to provide the Greenhouse application management pages. This is done on the basis of Section 25 (2) No. 2 TDDDG and Art. 6 (1) b and f GDPR.

The services are used for the following purposes:

- Checking the behavior of end users and device specifications to prevent abusive activities and to detect bots and other threats to the security and stability of the website (elements in web storage: "rc:: a", "rc::c");
- Enabling easy uploading of application documents from the cloud;
- Loading functions, fonts, images, and scripts to enable the delivery and proper display of content, page layout, correct redirection, and website functionality (elements in web storage: "position," "gh-test," "snowplowOutQueue\_job-board-renderer-tracker"); Cookies: \_\_sp\_root\_domain\_test\_\*).

The following providers are used for this purpose:

- Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland – <https://business.safety.google/privacy/>;
- Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland – <https://business.safety.google/privacy/>;
- Snowplow Analytics Limited, Floor 3, 48-50 Scrutton Street, London, EC2A 4HH, United Kingdom (UK adequacy decision) – <https://snowplow.io/privacy-policy>;
- Dropbox International Unlimited Company, One Park Place, Floor 5, Upper Hatch Street, Dublin 2, Ireland – <https://www.dropbox.com/privacy>.

### 5.3 Data entered by the user

#### 5.3.1 Application process

As part of the application process, you can set up and manage an account on the career portal after configuring a username and password. In addition to the individual application, you can use additional options in the Greenhouse applicant management system and configure your individual settings.

For an efficient and promising application, you can provide the following information in your application to us:

- Contact details (address, telephone number)
- CV details, e.g.
  - School education
  - Vocational training
  - Professional experience
  - Language skills
- Profiles on social networks (e.g., XING, LinkedIn, Facebook)
- Documents related to job applications (application photos, cover letters, certificates, references, work samples, etc.)

The legal basis for the processing of your application data is Section 26 (1) BDSG (establishment of an employment relationship). Where necessary, this is supplemented by Article 6 (1) b GDPR. Processing on the basis of legitimate interests (Art. 6 (1) f GDPR) only takes place to the extent necessary for system security, internal administration of the application process, or legal defense; our legitimate interest lies in these purposes, the use of the applicant management system by the controller is based on legitimate interest pursuant to Art. 6 (1) (f) GDPR. If consent within the meaning of Article 6(1)(a) GDPR is required for a specific processing activity, this consent will be obtained separately and transparently by the controller, unless it results from clear and voluntary conduct on your part in accordance with the transparency principle, such as voluntary participation in a video interview.

#### 5.3.2 Disclosure of data

Your personal data will be processed in applicant management exclusively for the purposes specified in this privacy policy and will not be disclosed to unauthorized third parties.

**Internal recipients.** Only the relevant departments and specialists of the controller, insofar as this is necessary for applicant selection or internal administration (Art. 6 (1) (b), (f) GDPR; Section 26 (1) BDSG; with consent Art. 6 Paragraph 1 lit. a) GDPR). For this purpose, information may be forwarded internally by email or via the applicant/management system.

**Affiliates (EU/EEA).** If necessary for the application process or group-wide administration, data will be transferred to affiliated companies (subsidiaries/branches) within the EU/EEA for the same purposes on the above legal bases. Depending on the structure, there are contracts for order processing (Art. 28 GDPR) or agreements on joint responsibility (Art. 26 GDPR).

**Order processing.** We engage service providers (e.g., providers of applicant management/IT services) in accordance with Art. 28 GDPR and oblige them to comply with appropriate technical and organizational measures (Art. 32 GDPR).

**Legal claims/authorities.** Data may be transferred for the purpose of asserting, exercise or defense of legal claims (Art. 6 (1) (f) GDPR; Section 26 4(1) BDSG) or in the case of a legal obligation to authorities (Art. 6 (1) (c) GDPR).

**Third countries (including the USA).** Data will only be transferred to countries outside the EU/EEA if

- an adequacy decision by the EU Commission has been issued (Art. 45 GDPR; e.g., EU US Data Privacy Framework), or
- appropriate safeguards are in place (Art. 46 GDPR), in particular EU standard contractual clauses (Art. 46 (2) (c)/(d) GDPR), with additional protective measures.

In exceptional cases, Art. 49(1) GDPR may apply (e.g., express consent).

#### 5.3.3 Disclosure of the status of an application

If you apply to us via a job board (e.g., LinkedIn), the data you provide will be automatically transferred to our recruiting system. Some of these job boards allow you to track the status of your application your account on the respective job board. To do this, our service provider Greenhouse will transmit the status of your application (receipt, processing of the application, rejection) to the job board on our behalf. The status notification in your account on the job board is delayed time delay (up to four weeks) so that we can inform you personally about the status of the application. The legal basis for the data transfer is Art.

6 (1) lit. b GDPR (initiation of an employment relationship). Further information on data processing can be found in the privacy policy of the respective job board through which you applied.

#### 5.3.4 Greenhouse App

We use the Greenhouse service to process applications via app. The use of the app is voluntary; alternatively, you can apply at any time via our application portal or by email. The general deletion periods in accordance with Section 6 of this privacy policy apply to the storage period.

### 6 Deletion and use of data

Your data will be stored for the duration of the application process and in accordance with the legitimate retention periods after completion of the application process. In the event of rejection, we regularly delete application data after 6 months (Art. 17 GDPR in conjunction with § 15 AGG). If you are hired, we will transfer relevant documents to your personnel file; further processing is based on the employment relationship (Section 26 BDSG) and statutory retention periods. The period specified in section 5.3.7 applies to talent pool data. Server logs: [7–14] days; Cloudflare: 124 days; analytics event data: [2–14] months (depending on configuration).

### 7 Your rights as a data subject

#### 7.1 Rights of data subjects

Data subjects are entitled at any time to find out whether their personal data has been stored and may assert a right to information about stored data (right to information), verify its accuracy (right to correction), request its supplementation and update, request its deletion (right to be forgotten), request the restriction of processing (right to restriction), and to have the data ported/ported in a commonly used, machine-readable format (data portability). These rights apply unless there are compelling and/or legitimate reasons on the part of the controller. To do so, please contact us or by mail to the address above. In cases where we process data based on your consent (Art. 6 para. 1 lit. a) GDPR), you have the right to withdraw your consent at any time without giving reasons and with effect for the future. The corresponding data processing will no longer take place in the future, but this does not affect the lawfulness of the processing that took place up to the time of revocation. In addition, you have the right to object to processing, for example if the data is being processed incorrectly or if there are other reasons in the interest of the data subject that prevent (further) processing. Data subjects also have the right to lodge a complaint with the supervisory authority responsible for data processing. Please note that in the event of an objection and/or revocation, certain services/processing activities cannot be performed or used to the extent that processing is necessary for these purposes.

#### 7.2 Automated decision-making

Automated decision-making, including profiling, does not take place. Should this be or become necessary, we will obtain transparent consent in advance of the processing at the appropriate point. processing.

#### 7.3 Application process

The provision of basic application data (contact details, qualifications, documents) is necessary for the review of your application. Without this data, participation in the application process is not possible.

### 8 Changes to this privacy policy

We reserve the right to change this privacy policy at any time in light of the continuously changing legal, technical, and organizational requirements for the processing of personal data. This also applies to any translation errors and differences with regard to national requirements of data protection law.

#### 1.1 Version

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