

Data Protection Information for Candidates in Accordance with Art. 13, 14 and 21 GDPR

This privacy policy informs candidates about the processing of personal data in the context of recruitment by our company.

1. Name and Contact Details of the Controller

Controller for the purposes of the General Data Protection Regulation (GDPR) is: TALENTspy GmbH, Ludwigstr. 9, D-80539 Munich, Phone: +49 89 480 5820,

E-Mail: info@talentspy.de, Web: www.talentspy.de

2. Contact Details of the Data Protection Officer

We have appointed an external Data Protection Officer who is available to answer any questions you may have in connection with data protection: DATENDO GmbH, Hohenzollernring 55, D-50672 Cologne, E-Mail: dsqvo@datendo.de, Web: www.datendo.de

3. Purposes and Legal Bases of Data Processing

We process personal data of candidates for the purpose of recruitment. In particular, this includes identifying suitable candidates, contacting them, introducing them to specific client companies and – with their consent – including them in our internal candidate pool for later consideration for suitable vacancies.

The processing is based on various legal bases of the GDPR:

- The first basis is Art. 6 para. 1 lit. f GDPR, which allows us to collect and process publicly accessible professional data, for example from professional social networks such as LinkedIn or XING, due to our legitimate interest in identifying suitable candidates.
- In addition, personal data is processed on the basis of your freely given consent in accordance with Art. 6 para. 1 lit. a GDPR, for example for the transfer of your data to specific client companies and for inclusion in our candidate pool.

- If there is a contractual relationship between you and us, the processing is carried out to fulfill this contract in accordance with Art. 6 para. 1 lit. b GDPR and to fulfill legal obligations, in particular tax retention obligations, in accordance with Art. 6 para. 1 lit. c GDPR.
- In individual cases, it may also be necessary to process special categories of personal data within the meaning of Art. 9 para. 1 GDPR - for example health data, insofar as they are necessary for the assessment of suitability for a particular employment relationship. The processing of such data is then carried out exclusively on the basis of your express consent in accordance with Art. 9 para. 2 lit. a GDPR.

4. Categories of Personal Data

The following personal data may be processed as part of our activities:

- Master data: Name, address, contact details, date of birth,
- Professional data: Curriculum vitae, qualifications, professional experience, references,
- Communication data: E-mail correspondence, telephone notes,
- Other voluntary information: Letter of motivation, salary expectations,
- Personal mobility and availability,
- Special categories of personal data (Art. 9 GDPR): e.g. health data, insofar as this is necessary for the placement activity and you have expressly consented to this.

5. Origin of the Data

The data either comes directly from you or has been collected from publicly accessible sources, in particular from job-related social networks such as LinkedIn or XING.

6. Recipients or Categories of Recipients

Your personal data may be passed on to the following categories of recipients – only to the extent necessary:

- Client companies (potential employers) in the course of the recruitment process, but only with prior express consent,
- IT service providers, in particular providers of our candidate management software (e.g. EmmySoft, www.emmysoft.com), within the framework of data protection-compliant order processing,
- Communication and hosting service providers who provide technical support for processing (also within the framework of order processing).

7. Rights of the Data Subject & Right to Lodge a Complaint

Candidates have the following rights under the GDPR:

- the right to information about the stored personal data (Art. 15 GDPR),
- the right to rectification of inaccurate or incomplete data (Art. 16 GDPR),
- the right to erasure of the data, provided that there are no statutory retention obligations to the contrary (Art. 17 GDPR),
- the right to restriction of processing (Art. 18 GDPR),
- the right to data portability (Art. 20 GDPR),
- the right to withdraw your consent with effect for the future (Art. 7 (3) GDPR),
- as well as the right to object to processing if this is based on a legitimate interest (Art. 21 GDPR).
- You have the right to object to the processing of personal data at any time for reasons arising from your particular situation, provided that this is based on Art. 6 para. 1 lit. F GDPR. After an objection, the data will no longer be processed unless there are compelling legitimate grounds for the processing.

You have the right to lodge a complaint with the competent data protection supervisory authority: Bayerisches Landesamt für Datenschutzaufsicht, Promenade 18, D-91522 Ansbach, Phone: +49 981 / 180093-0, [E-Mail: poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de), Web: www.lda.bayern.de

8. Revocation of Consent

If the processing is based on your consent, you can revoke it at any time with effect for the future. The revocation can be made informally, for example by e-mail. This does not affect the legality of the processing carried out up to the time of revocation. After revocation, we will no longer process your personal data on this basis, unless there is another legal basis or a legal obligation.

9. Storage Duration

Your personal data will only be stored for as long as is necessary for the above-mentioned purposes:

- If the processing is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR, we will store your data until you withdraw your consent, but no later than two years after the last contact, unless longer storage is legally permissible or required.
- If the processing is based on a legitimate interest (Art. 6 para. 1 lit. f GDPR), the data will also be stored for a maximum of two years after the last contact, unless any other consent or legal basis justifies longer storage.
- If the processing is carried out to fulfill a contractual relationship with you (Art. 6 para. 1 lit. b GDPR) or to fulfill legal obligations, in particular tax compliance obligations (Art. 6 para. 1 lit. c GDPR), we store your data for the duration of the contract and beyond that for the duration of the statutory retention periods.
- When processing special categories of personal data in accordance with Art. 9 para. 2 lit. a GDPR, the data is stored on the basis of your express consent for as long as this is necessary.

10. Necessity of the Provision of Personal Data

The provision of personal data is fundamentally necessary for the implementation of the placement process. Without the necessary data, placement or consideration in our candidate pool is not possible. Failure to provide this data may therefore mean that we are unable to consider you as a candidate. The provision of certain data, such as special categories of personal data (e.g. health data), is only required if this is necessary in individual cases for the assessment of your suitability.

11. Data Transfer to Third Countries

Your personal data will not be transferred to a third country outside the EU or the EEA.

12. Automated Decision-making / Profiling

Automated decision-making including profiling in accordance with Art. 22 GDPR does not take place.

Status: 23 June 2025

Note: For better readability, this document does not use gender-specific spelling. All personal designations are to be understood as gender-neutral and refer equally to all genders.