



## Privacy Policy for applicants

Dear applicant,

We are excited about your interest in our company. In accordance with the requirements of the European Data Protection Regulation (hereinafter referred to as GDPR), we hereby inform you about the processing of your personal data submitted as part of the application process and, in some cases, collected by us, and about your corresponding rights. To ensure that you are fully informed about the processing of your personal data during the application process, please read the following information carefully.

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### Responsible body in the sense of data protection law

The responsible party within the meaning of the GDPR and other relevant provisions of data protection law is:

audibene GmbH  
Schönhauser Allee 53  
10437 Berlin

Tel.: 030 364 283 680

Email: [info@audibene.de](mailto:info@audibene.de)

Website: [www.audibene.de](http://www.audibene.de)

## Contact details of our data protection officer

For all questions regarding audibene's data protection, please contact our data protection officer at any time at: [datenschutz@audibene.de](mailto:datenschutz@audibene.de). You can also contact our data protection officer by post at the above address. Please address your letter explicitly to "Data Protection Officer".

## 1. Data processing

We process personal data as part of your application. Personal data is any information relating to an identified or identifiable person. A person is among other things identifiable by name or age (Art. 4 No. 1 GDPR). For further terminology, in particular "processing", we refer to Art. 4 GDPR and § 26 of the German Federal Data Protection Act (BDSG).

### 1.1. Purposes and legal basis of processing

We process your personal data in accordance with Article 88 of the GDPR in connection with § 26 (1) BDSG, insofar as it is necessary for the decision on the establishment of an employment relationship with us.

If you give us express consent to process personal data for specific purposes, the lawfulness of this processing is based on your consent in accordance with Art. 6 (1) lit. a GDPR. Consent given can be revoked at any time, with effect for the future.

If there will be an employment relationship between you and us, in accordance with Art. 88 GDPR in connection with § 26 (1) of the German Federal Data Protection Act (BDSG), we may further process the personal data already received from you for the purposes of the employment relationship, insofar as this is necessary for the implementation or termination of the employment relationship or for the exercise or fulfillment of the rights and obligations of the employee representation resulting from a law or a collective agreement, a works agreement or a service agreement (collective agreement).

Furthermore, we may process your personal data if this is necessary for the fulfillment of legal obligations (Art. 6 para. 1 lit. c GDPR) or for the defense of asserted legal claims against us. The legal basis for this is Art. 6 para. 1 lit. f GDPR. The legitimate interest is, for example, a duty to provide evidence in proceedings under the General Equal Treatment Act (AGG).

### 1.2. Categories of personal data

We only process personal data that is related to your application. This includes in particular:

- General personal data (name, address, telephone, e-mail address, etc.)
- Information about your professional qualifications and school education
- Information on further professional training

- If applicable, further data that you provide to us in connection with your application and employment (e.g., photo on your resume and/or internal HR software)

### 1.3. Sources of the data

We process personal data that we receive from you by post or e-mail in the context of your application, or that you send us via external platforms.

### 1.4 Recipients of the data

Within our company, we only pass on your personal data to those departments and persons who need this data to fulfill contractual and legal obligations or to implement our legitimate interests. This includes our HR department, which takes care of the application process, as well as any subsequent internal supervisors of the team in question.

Otherwise, data will only be transferred to recipients outside the company if this is permitted or required by law, if the transfer is necessary to fulfill legal obligations, or if we have your consent.

### 1.5 Duration of the stored data

We store your personal data as long as it is necessary for the decision about your application in accordance with Art. 5 para. 1 lit. e GDPR.

In the event of a rejection decision, your personal data or application documents will be deleted a maximum of six months after notification, unless longer storage is legally necessary or permissible. This is the case, for example, if it is required by law or in the specific case for the assertion, exercise or defense of legal claims for the duration of a legal dispute. In the event that you have consented to a longer storage of your personal data, we will store it in accordance with your declaration of consent.

If an employment relationship is established following the application process, your data will initially continue to be stored to the extent necessary and permissible and then transferred to the personnel file.

If applicable, you will receive an invitation to join our talent pool following the application process. This allows us to continue to consider you in the future for suitable openings in our selection of applicants. If we have your consent, we will store your application data in our talent pool in accordance with your consent or any future consent.

## 2. Greenhouse

We use the service of Greenhouse Software Inc., 110 Fifth Avenue, New York, NY, 10011 USA to process your data and thus for the purpose of employee acquisition.

Greenhouse is used by us to organize the recruiting process. We store all relevant documents there, such as application documents or personality tests.

The processing is necessary for the establishment of an employment relationship between potential applicants and audibene. The legal basis for the processing is Art. 88 GDPR in connection with § 26 (1) BDSG.

An order processing contract has been concluded with Greenhouse in accordance with Art. 28 (3) GDPR. The contract ensures that the data is processed by Greenhouse only for the purposes for which we collected the data. In addition, Greenhouse commits to ensure an adequate level of protection.

In this context, the following data will be processed by Greenhouse:

- Identification data (e.g., name, address, email address, emergency contact information)
- Electronic identification data (e.g., login data)
- Job applicant information (e.g., name, email, mailing address, education, employment history, resume, hobbies, and other work experience information)
- Application photo if submitted
- Any other personal data uploaded or transmitted through the Services

The data will not be kept in Greenhouse longer than necessary for the purpose of your application with us (Art. 5 (1) (e) GDPR). After 6 months, all applicant data will be deleted from Greenhouse. Exceptions may result from legal storage and documentation obligations (see under point "1.5. Duration of stored data").

For more information, please read Greenhouse's privacy policy at: <https://www.greenhouse.io/de/privacy-policy> or contact Greenhouse's privacy team directly at: [privacy@greenhouse.io](mailto:privacy@greenhouse.io).

### 3. Your rights

You have the following rights with regard to the processing of your data:

- The right of access to information free of charge pursuant to Art. 15 GDPR as to whether and which data concerning you has been processed by audibene. This includes the right to inspect the personnel file
- The right to correct incorrect or incomplete data in accordance with Art. 16 GDPR
- Right to have your data deleted, including the "right to be forgotten" in accordance with the requirements of Art. 17 GDPR, insofar as this does not conflict with any retention obligations
- Right to restriction of data processing, insofar as the requirements of Art. 18 GDPR are met
- Right to data portability, insofar as the prerequisites of Art. 20 (1) GDPR are met
- Right to object to data processing, as far as the requirements of Art. 21 (1) GDPR are met

If you have consented to the processing of your data, you are entitled to revoke your consent to the processing of your personal data at any time in accordance with Art. 7 (3) of the GDPR. Please note that the revocation is only effective for the future. Processing that took place before the revocation is not affected. To do so, please contact [datenschutz@audibene.de](mailto:datenschutz@audibene.de).

If you believe that the processing of your personal data violates the provisions of the GDPR, you have the right to file a complaint with a competent supervisory authority pursuant to Article 77 of the GDPR. The right of appeal is without prejudice to any other administrative or judicial remedy.

If you have any questions or complaints, we recommend that you first contact our data protection officer ([datenschutz@audibene.de](mailto:datenschutz@audibene.de)) so that the problem or question can be resolved quickly.

If you wish to exercise your rights listed above, please contact our Data Protection Officer at [datenschutz@audibene.de](mailto:datenschutz@audibene.de) or by post to the address stated above. In order to ensure that the person is really you, we would like to ask you to identify yourself (e.g. by a copy of your ID card or driver's

license). We do not save this data and delete it directly as soon as the purpose of identification has been reached.

#### 4. Requirement of providing personal data

The providing of personal data in the context of application processes is neither required by law nor by contract. You are not obliged to provide information about your personal data.

However, please note that some of your personal data may be essential for the decision on an application or the conclusion of a contract regarding an employment relationship with us. If you do not provide us with any personal data, we will not be able to make a decision regarding the establishment of an employment relationship. We recommend that you only provide personal data that is necessary to complete your application. You can use our corresponding job advertisement as a guideline for this.

#### 5. Automated decision making

Since the decision about your application is not based exclusively on automated processing, there is no automated decision-making in individual cases within the meaning of Article 22 of the GDPR.

#### 6. Security measures

We take organizational, contractual, and technical security seriously and institute measures and controls in accordance with the law via conventional and state of the art methods to ensure that the provisions of data protection laws are complied with in order to protect the data processed by us against accidental or intentional manipulation, loss, destruction, or against unauthorized access. Both internal and external audits ensure compliance with all data protection-related processes at audibene.

The security measures include, in particular, regular checks on access to and disclosure of personal data. In addition, we always control access to buildings and data processing systems.

Our employees and all persons involved in data processing are obligated to comply with data protection laws and to handle personal data confidentially. Our employees are trained accordingly.

#### 7. Changes to the data privacy policy

We reserve the right to change the data privacy policy in order to adapt it to changed legal situations or in the event of changes to the service and data processing. We ask you to regularly inform yourself about the content of the data privacy policy.

**Status: August 2021**