

## Privacy Policies for Applicants at LOVOO

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We thank you for your interest in working with us. In the following, we would like to explain how we process your personal data which you give to us during the application process. Data Security is very important to us and we take great care to protect your personal data.

### 1. What is personal data?

"Personal data" means any information relating to an identified or identifiable natural person (hereinafter referred to as 'affected person' (m/f/d)). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### 2. Who is responsible for the processing of your personal data?

LOVOO GmbH  
represented by management Anna Maria Wanninger and Claudio Di Vincenzo  
Prager Straße 10  
01069 Dresden (Germany)  
Email: jobs@lovoo.com

### 3. Our Data Protection Officer

ePrivacy GmbH  
represented by the director Prof. Dr. Christoph Bauer  
Große Bleichen 21  
20354 Hamburg (Germany)  
email: datenschutz@lovoo.com

### 4. Which data are we processing?

Within the application process, we collect and process the personal data you sent us, like

- contact and address information (especially first and last name, email address, telephone number, address);
- Information about your work history (especially cover letter and CV), as well as salary range;
- possibly, your application image,
- your schooling or professional training;
- information about your qualifications, especially degrees and certificates.

In addition, we process additional optional information (Other) and remarks about your person, when this information is shared with us via the application form.

Furthermore, we process data from interviews and meetings, which we have had with you for the purpose of the application process.

Data is normally shared by the applicants themselves freely, so that we gather it directly from the applicants. In some cases we contact potential candidates for the first time directly in Social Networks, especially on LinkedIn or Xing. In this case, we collect the personal data shared by the person themselves to contact the applicant. In case we work with recruiting agencies, they provide us with the data of the applicant.

## **5. Purpose and Legal Basis of Data Processing**

### **5.1 Data Processing for the Purpose of Decisionmaking about Entering into an Employment Relationship**

We save and process the personal data provided by you, to check your application and to be able to process it correctly. Your entered personal data is processed on the basis of § 26 Section 1 in connection with Section 8 Part 2 BDSG (National Data Protection Act). This legal basis allows the processing of personal data of applicants, when it is necessary to reach a decision regarding whether or not to enter in an employment relationship.

### **5.2. Data Processing for the Purpose of the Talent Pool**

You have the option to decide if we can save your shared personal data as well as other information from meetings and interviews even in case we have not entered into an employment relationship. The purpose of this is that we may contact you for offering possible fitting and attractive positions. For this we enter your data in our Talent Pool.

We only add you to the talent pool, if you have given us explicit consent that allows us to do so. Legal basis is Article 6 Subparagraph 1 lit. a) combined with Article 7 GDPR. Following this, processing personal data is lawful, when the affected person has consented to the processing of personal data for one or more specific purposes. Should your application contain specific categories of personal data regarding Article 9 Section 1 GDPR (for example a picture that allows inference of racial and ethnical background or religious beliefs), data processing for entering the talent pool is only done upon explicit consent following Article 9 Section 2 lit. a) GDPR in connection with § 26 Abs. 3 Satz 2 BDSG (National Data Protection Act). According to this processing of special categories of personal data is lawful when the affected person has explicitly consented to personal data processing for one or more specific purposes.

### **5.3 Data Processing for the Purpose of Transfer and Evaluation by other companies of the ParshipMeet Group.**

The personal data shared with us is being sent to ParshipMeet Group's companies in case the position offered has specific work-related overlaps with these companies. Data processing is done on the basis of Article 6 Subparagraph 1 lit. f) GDPR. According to this provision, data processing is lawful if the processing is necessary to protect the legitimate interests of the responsible person or a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of affected persons, which require the protection of personal data,

in particular where the affected person is a child. Our legitimate interest consists in the fact that companies that are part of the ParshipMeet Group may evaluate if the necessary qualification is present.

#### **5.4. Data processing for the Purpose of Allowing Communication**

In case we contact applicants directly via a social network, because the applicant's profile seems sufficient, the communication attempt follows Article 6 Subparagraph 1 lit. f GDPR. According to this provision, data processing is lawful if the processing is necessary to protect the legitimate interests of the responsible person or a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of affected persons, which require the protection of personal data, in particular where the affected person is a child. Our legitimate interest is proactive communication for the purpose of recruiting.

#### **5.5 Data Processing for the Purpose of Determent of Claims**

In addition, we may process your personal data for the purpose of deterring claims against us stemming from the application process, if this becomes necessary. Legal basis for this is Article 6 Subparagraph 1 lit. f) GDPR. According to this provision, data processing is lawful if the processing is necessary to protect the legitimate interests of the responsible person or a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of affected persons, which require the protection of personal data, in particular where the affected person is a child. Our legitimate interest is determent of possible claims of applicants for example on the grounds of the General Equal Treatment Act (AGG).

#### **5.6 Data Processing in Case of Entering into an Employment Relationship**

When the decision to enter into an employment relationship between you and us is reached, we can, according to § 26 Section 1 BDSG, process the personal data given by you for the purpose of the employment relationship when this is necessary to carry it out or to terminate it.

### **6. Who are the receivers or categories of receivers of personal data?**

Within the LOVOO GmbH, access to personal data is granted only to these persons and departments that necessarily need to know to reach a decision about applicant selection.

We only transfer personal data to third parties when there is a legal basis for this, like a special consent regarding sending personal data to third parties or like adhering to legal regulations in which we are obliged to offer information, report or transfer this data. If the process of checking an application makes it necessary, we also send the data to group members of the ParshipMeet Group.

In addition, data is only transferred to external service providers, who exclusively process data at our command and according to our statutes, like specifically our hosting provider. Our data processor in specific connection to the application process, is, amongst others, the Haufe Service Center GmbH, which develops the application management tool 'Umantis' for us. In addition, we administer the applications and the talent pool. We also use the services of Spark Hire Inc, to enable video interviews with you.

When data is being processed, we adhere to universal security guidelines regarding data security that contains the current up-to-date technical specifications. Data is being encrypted according to current up-to-date security standards.

## 7. Processing of your data in a third country

A data transfer to bodies and service providers in the context of commissioned processing in countries outside the European Union (EU) or the European Economic Area (EEA) (so-called third countries), such as the USA, only takes place if an adequacy decision of the EU Commission exists for the third country or through concluded EU standard contractual clauses. Information, documentation, and a copy may be requested from LOVOO GmbH.

## 8. Storage period

We save your data only until the decision about entering into an employment relationship is made. In case we do not enter into an employment relationship with you, all data shared with us, that was saved, will be deleted 5 months after receipt in so far as we do not have to store data longer due to legal proceedings.

When you have given us permission to also enter your data into the talent pool (Section 5.2) other timelines apply. In such a case we save your data until you revoke this permission.

In case you execute your right to withdraw your application, we also delete your personal data right away.

## 9. Your rights

You have the following rights regarding your personal data:

- Right of access (Article 15 GDPR);
- Right to rectification (Article 16 GDPR) or erasure (Article 17 GDPR);
- Right to restriction of processing (Article 18 GDPR);
- Right to data portability (Article 20 GDPR);
- Right to object processing (Article 20 GDPR), especially in case processing of personal data is based on weighing of interest following Article 6 subparagraph 1 lit. f GDPR.
- In addition, you can revoke your consent at any time with immediate future effect (Article 7 Section 3 GDPR) By the revocation of consent the lawfulness of data processing for the time before the revocation is not affected.

You can execute your rights by sending an email to the following email address: [datenschutz@lovoo.com](mailto:datenschutz@lovoo.com)

- In addition it is your right to contact the data security regulation agency and file a complaint about the processing of your personal data through us. (Article 77 GDPR). We are administered by:

Saxonian Data Protection Officer  
Postfach 11 01 32  
01330 Dresden  
telephone 0351/85471 101

telefax: 0351/85471 109  
Internet: [www.datenschutz.sachsen.de](http://www.datenschutz.sachsen.de)  
Email: [saechsdsb@slt.sachsen.de](mailto:saechsdsb@slt.sachsen.de)

#### **10. Information according to Article 13 Section 2 lit. e GDPR**

The provision of your data in the context of an application is neither legally nor contractually required. You are not required to provide your personal data to us. For a proper handling of your application, data processing of personal data as mentioned in section 3 is necessary.