

Notes on Data Security 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?

ParshipMeet Holding GmbH represented by management Marc Schachtel and Henning Rönneberg

Speersort 10
20095 Hamburg (Germany)
E-mail: jobs@lovoo.com

3. Our Data Protection Officer

Dr. Stefanie Wegener

Speersort 10
20095 Hamburg (Germany)
E-Mail: 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 (in particular first and last name, e-mail 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 ParshipMeet Holding 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.

ParshipMeet Holding GmbH may use service providers when collecting or processing your personal data. ParshipMeet Holding GmbH will ensure that service providers only receive that portion of your personal data they need for their specific activity.

ParshipMeet Holding GmbH uses service providers for the technical application process and for hosting, among other things.

Service providers are usually involved as processors who are only allowed to process personal data of the users of this online service as instructed by ParshipMeet Holding GmbH.

7. Processing of your data in a third country

The Parship Meet Holding GmbH may also forward your data to third parties, controllers or processors who are not based in non-EU/EEA countries. In this case, we will ensure prior to forwarding that the recipient has an adequate level of data protection (e.g. based on an adequacy decision of the EU Commission for the respective country pursuant to Article 45 GDPR or the agreement of standard contractual clauses of the European Union (including UK and CH addendum when applicable) with the recipient pursuant to Article 46 GDPR using additional technical and organizational protective measures) or that sufficient consent has been obtained from our users.

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.

- 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:

Free and Hanseatic City of Hamburg
The Hamburg Commissioner for Data Protection and Freedom of Information,
E-Mail: mailbox@datenschutz.hamburg.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.