

Data Protection Information for Applicants

Information on data protection on the processing of applicant data in accordance with Art. 13 GDPR

Dear Applicants,

Thank you very much for your interest in our company. In accordance with the provisions of Art. 13 of the General Data Protection Regulation (GDPR), we hereby inform you about the processing of the personal data transmitted by you as part of the application process and, if applicable, collected by us and your rights in this regard. In order to ensure that you are fully informed about the processing of your personal data as part of the application process, please take note of the following information.

1. Name and contact details of the controller

Responsible for the processing of your personal data in the context of this contact is the

Xentral ERP Software GmbH
Viktoriastraße 3b
86150 Augsburg
Email: kontakt@xentral.com

2. Contact details of the data protection officer

The designated data protection officer is the

DataCo GmbH
Sandstrasse 33
80335 München
Email: datenschutz@dataguard.de
www.dataguard.de

3. Categories of personal data

As part of the application process, we only process data that is related to your application. This may include the following personal data about you.

Application via the applicant portal or sending documents by post, e-mail:

- Personal master data (e.g. title, title, first name, last name, date of birth)
- Address data (e.g. street, house number, postcode, city, country)
- Contact details (e.g. mobile phone number, e-mail address)
- Knowledge (e.g. language skills, additional knowledge)
- Application or profile data (e.g. cover letter, curriculum vitae, certificates, earliest starting date, desired job, salary expectations, how you became aware of us)
- Details of contact persons for a reference

- Information on current compensation, pension and benefits arrangements
- Areas of interest data
- Link to professional networks, such as XING or LinkedIn profile
- If applicable, bank details for travel expenses incurred
- Portrait picture
- Receipt of your consent to be included in the applicant and/or talent pool
- Existence of your consent to the addressing of references mentioned by you and, if applicable, data from correspondence with these references
- Existence of your consent to the forwarding of your profile to us by a personnel service provider or a contract between you and the personnel service provider

When accessing and using the applicant portal:

- IP address
- Information about the browser type and its version
- The operating system of the device
- Your Internet Service Provider
- Date and time of access
- websites accessed by you through our website; Cookie data (e.g. pseudonymous cookie ID, length of stay on our applicant portal, page views, movement via links)
- Content you may share

We process personal data that we receive from you by post or e-mail when you contact us or when you apply, or that you transmit to us via our applicant portal or professional networks such as LinkedIn.

4. Purposes of the processing and their legal basis

Your personal data will be processed for the following purposes:

Purpose	Legal basis
Decision on the establishment of an employment relationship with us	Art. 88 GDPR in conjunction with § 26 para. 1 in conjunction with para. 8 sentence 2 BDSG
On the basis of consent	Art. 6 para. 1 sentence 1 lit. a GDPR
Implementation of pre-contractual measures	Art. 6 (1) (b) GDPR
Establishing, exercising or defending legal claims.	Art. 6 para. 1 sentence 1 lit f GDPR, Art. 9 para. 2 lit. f GDPR
To the extent that special categories of personal data are processed that you have obviously made public.	Art. 9 (2) (e) GDPR

We do not collect sensitive data (so-called special categories of personal data relating to racial or ethnic origin, physical or mental health or physical or mental condition, trade union membership, offenses committed or alleged to have been committed and related legal actions) for the processing of your application and the selection of our employees. We kindly ask you not to provide us with such data with your application. If you do, we understand this as consent to

process this data as part of the application process. The data will not be taken into account as part of the selection process.

If you do not provide us with the personal information we need to select personnel, establish an employment relationship or perform our obligations as an employer, we may not be able to consider your application or fulfill our obligations as a potential future employer.

5. Use of AI-supported analysis tools in the application process

We use an AI-supported analysis tool provided by our service provider Lever Inc. to support our application process and to evaluate how well your application matches the requirements of the respective position (“matching”/pre-selection). In particular, the information you provide during the application process (e.g., CV, qualifications, professional experience, skills) is analyzed and used to generate a recommendation or prioritization score for our recruiters.

The legal basis for this processing is Section 26(1) of the German Federal Data Protection Act (BDSG) and/or Article 6(1)(b) GDPR (decision on the establishment of an employment relationship). In addition, we rely on our legitimate interest in an efficient, structured, and professionally comprehensible selection process (Article 6(1)(f) GDPR).

The decision on whether to establish an employment relationship is not made solely by automated means, but is always taken by our employees. The tool merely supports the prioritization of the manual review.

Lever uses the cloud provider Amazon Web Services (AWS) for the technical provision of this service. Data processing agreements pursuant to Article 28 GDPR are in place with Lever and AWS.

6. Recipients or categories of recipients of the personal data

As part of the processing of your personal data, we may pass on your personal data to the following recipients:

- Within our company, only to those areas and persons who need this data to fulfil contractual and legal obligations or to implement our legitimate interest
- Personnel department
- External Employees / Freelancers
- Processor
- Third
- Affiliates

Your personal data will be processed on our behalf on the basis of order processing agreements in accordance with Art. 28 GDPR. In these cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR. The categories of recipients in this case are providers of internet services as well as providers of applicant tracking systems and software.

In particular, your data will be transmitted to the following processors:

Subcontractor	Contact details	Activity
Google Cloud EMEA Limited	70 Sir John Rogerson's Quay, Dublin 2, Ireland	Processing of documents, spreadsheets, general data storage, collaborative work

DocuSign Germany GmbH	Neue Rothofstraße 13-19 60313 Frankfurt Germany E-mail: emea@docusign.com EMEA Phone Number: +44 203 714 4800	Signing of electronic documents
Lever Inc.	1125 Mission St. San Francisco, California 94103, USA	Recruiting Software, including an AI-supported matching function (based on AWS Bedrock)
Anthropic, PBC	548 Market Street, PMB 90375 San Francisco, CA 94104, USA	Provision of an AI model via API to support internal preliminary candidate screening.

Otherwise, data will only be passed on to recipients outside the company if this is permitted or required by law, if the disclosure is necessary for the fulfillment of legal obligations or if we have your consent.

7. Information on risks in the context of transfers to third countries

When using some service providers, personal data may be stored on servers in third countries outside the EU, such as e.g. the United States. For the USA, an adequacy decision pursuant to Art. 45 (3) GDPR for certified providers has been in place since 11.07.2023. We would like to point out that, despite the existence of an adequacy decision, a transfer of data entails certain risks, of which we would like to inform you below:

U.S. intelligence agencies use certain online identifiers (such as IP addresses or unique identification numbers) as a starting point for monitoring individuals. In particular, it cannot be ruled out that these messaging services have already collected information about you, with the help of which the data transmitted here can be traced back to you.

Electronic communications service providers headquartered in the U.S. are subject to surveillance by U.S. Intelligence Services pursuant to 50 U.S. Code § 1881a ("FISA 702"). Accordingly, providers of electronic communications services headquartered in the United States have an obligation to provide personal information to the U.S. authorities pursuant to 50 U.S. Code § 1881a, without you possibly having any legal remedies. Even encryption of the data in the data centers of the electronic communications service provider cannot provide adequate protection, since a provider of electronic communications services has a direct obligation to provide access to or hand over the imported data in its possession, custody or control. This obligation may also expressly extend to the cryptographic keys, without which the data cannot be read.

In addition, the Cloud Act (Clarifying Lawful Overseas Use of Data – Act, Regulation 18 U.S.C. § 2713) also authorizes U.S. security agencies to access data from European companies with parent companies in the U.S.

If the processing is based on a legal basis other than the adequacy decision, the transfer and processing of data by our service providers outside the EU will be ensured on the basis of

appropriate safeguards in accordance with Articles 46 et seq. of the GDPR. This is achieved in particular through the implementation of so-called standard data protection clauses in accordance with Article 46 (2) (c) GDPR.

8. Duration of storage of personal data

We will store your personal data for as long as it is necessary to make a decision on your application.

If an employment relationship between you and us is not established, your personal data will be deleted from the system six months after the end of the process.

Insofar as an employment relationship between you and us is established, we may continue to process the personal data already received from you for the purposes of the employment relationship in accordance with Section 26 (1) of the Federal Data Protection Act (BDSG) if this is necessary for the performance or termination of the employment relationship or for the exercise or fulfilment of the rights and obligations of the employees arising from a law or a collective agreement, a works or service agreement (collective agreement). representation of the interests of employees.

9. Rights of data subjects

Under the General Data Protection Regulation, you have the following rights:

- If your personal data is processed, you have the right to obtain information from the controller about the data stored about you (Art. 15 GDPR).
- If incorrect personal data is processed, you have the right to have it corrected (Art. 16 GDPR).
- If the legal requirements are met, you can request the deletion or restriction of processing (Art. 17 and 18 GDPR).
- If you have consented to data processing or if there is a contract for data processing and the data processing is carried out by automated means, you may have a right to data portability (Art. 20 GDPR).
- If you object to the processing for direct marketing purposes, the personal data concerning you will no longer be processed for these purposes.
- Furthermore, you have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). The supervisory authority responsible for us is the Bavarian State Office for Data Protection Supervision. You can reach them at

Bavarian State Office for Data Protection Supervision

Address

Promenade 18

91522 Ansbach

Germany

Phone: +49 (0) 981 180093-0

Fax: +49 (0) 981 180093-800

E-mail: poststelle@lda.bayern.de

If the legal requirements are met, you may object at any time to the processing of personal data concerning you on the basis of Art. 6 (1) (e) or (f) GDPR (Art. 21 GDPR) on grounds relating to your particular situation.

Right of revocation in case of consent

If you have consented to the processing of your personal data by the controller, you can withdraw your consent at any time for the future. In this case, the lawfulness of the data processing carried out before the revocation is not affected.

We reserve the right to make changes to this Privacy Policy at any time. The Privacy Policy will be updated regularly and any changes will be automatically posted on our website.