

Data Protection Information on Applicant Management

We process your personal data exclusively within the framework of the statutory provisions. We process data that you have sent us in connection with your application in order to check your suitability for the position (or, if applicable, other open positions in our company) and to proceed with the application process.

The following categories of personal data are included:

- (1) Contact data (first and last name, address)
- (2) Data of communication (telephone number, cellphone number, fax number, email-address, language of communication)
- (3) Personal data (date of birth, place of birth, nationality, civil status, gender)
- (4) Job-related and personal data (desired work location and time of availability, desired salary, willingness to relocate and travel, work permit)
- (5) Qualification data (graduation from school, education/studies, language and professional skills)
- (6) Data on the assessment and evaluation in the application process
- (7) Data about the previous careers, curriculum vitae, training and work certificates, qualification certificates)
- (8) Application photo
- (9) Application history (consent to data storage, inclusion in applicant/talent pool)

1. Data Controller and Data Protection Officer

The person in charge for processing your personal data is

ATCP Management GmbH
Wittestr. 30, Haus F
13509 Berlin, Germany

You can reach our data protection officer via:

datenschutzbeauftragter@aroundtowncommercial.com

Data Protection Information on Applicant Management

2. Purpose and legal basis of the processing of personal data

2.1. Data processing for the purpose of contract initiation and conclusion

Personal data is processed through an application management for the purpose of initiating employment contracts. The legal basis of the data processing, which is required in connection with the decision on the initiation of an employment/training relationship, is Paragraph 26 FEDERAL DATA PROTECTION ACT, Art. 6 para. 1 p. 1 lit. b) GDPR.

- (1) Personal addressing
- (2) Applicant communication, contacting for suitable positions
- (3) Planned employment
- (4) Matching job requirements and applicant's ideas
- (5) Matching of job requirements, skills and applicant's expectations
- (6) Matching of job requirements, skills and applicant's expectations, defense of claim
- (6) Matching of job requirements and skills of the applicant
- (7) Communication with the applicant

2.2. Data processing upon your consent

There is a possibility that your application will be deposited in an applicant/talent pool for the placement of job offers suitable for you.

In order to be able to save your application for a later date, we need your consent in accordance with Art. 6 sec. 1 p. 1 lit. a) GDPR.

If you have given us your written consent for the admission of your application documents to the applicant/talent pool, the lawfulness of the processing is given on the grounds of your consent.

Your consent is given voluntarily and can be revoked at any time with effect for the future. As of the moment of the receipt of the revocation, we may no longer process your application documents for the above-mentioned purposes. The revocation of your consent does not affect the lawfulness of the processing carried out up to that point.

Data Protection Information on Applicant Management

The declaration of revocation can be sent by post or e-mail to the following address:

ATCP Management GmbH
Wittestraße 30, Haus F
13509 Berlin

Email: widerruf@aroundtowncommercial.com

2.3. Data processing according to weighing of interests

If data is required for legal prosecution after completion of the application process, we have a legitimate interest in pursuing our claims or representation for the purpose of defending claims, Art. 6 sec. 1 lit. f) GDPR.

3. Categories of recipients / Disclosure of personal data

Within our company, access to your data is granted to those departments that need it to fulfill the above-mentioned purposes.

In some cases, we use external service providers for the processing of your data within the framework of commissioned processing. These have been carefully selected and commissioned by us and are bound by our instructions and are regularly monitored. As a result, commissioned processors may only process your personal data in the way we have explicitly instructed them to. They have also maintain agreed on technical and organizational measures to process your data securely.

Personal data will only be transferred by us to third parties if this is necessary for the aforementioned purposes, or if you have given your prior consent. Recipients of personal data may include: Authorities, lawyers, call centers, printing service providers.

4. Applicant portal Personio

For our application management, we use the services of Personio GmbH, an application management software. If you apply by e-mail or via the application web form, the transmitted data is transferred via TLS encryption and stored in a database that we use via Personio. We have agreed with Personio on order processing in accordance with Art. 28 GDPR and technical-organizational measures.

Personio uses a cloud system. The data is stored in Germany. The contractual use of the cloud services is explicitly limited to the EU/EEA area. The access options are regulated accordingly. A comprehensive data protection and IT security concept has been developed with the cloud provider. Personal data is stored in the cloud exclusively in encrypted form (state-of-the-art encryption algorithms, if possible AES-256). The keys are generated outside the cloud. Only Personio has access to

Data Protection Information on Applicant Management

the master key and the keys derived from it. You can find more information about data protection at Personio under: <https://www.personio.de/datenschutz/>

5. Transfer of personal data to a third-party country

A data transfer of your personal data does not occur.

6. Duration of storage or deletion of personal data

In the event of rejection, your application documents will be deleted no later than 6 months after completion of the application process.

If you are able to accept a position as part of the application process, your data will be further processed by us for the purposes of the employment relationship.

If employment occurs, we delete your personal data 3 years upon completion of the year in which the employment relationship was terminated.

In the event that you have consented to further storage of your personal data (e.g. applicant/talent pool), we will delete the data after 12 months have passed since you gave your consent.

7. Data subject rights / Your rights

If you have any questions or complaints regarding data protection, you can contact our company and our data protection officer. You have a right to information according to Art. 15 GDPR. You can find the contact details under point A of this data protection notice.

Your rights also include

- the right to rectification pursuant to Art. 16 GDPR,
- the right to deletion pursuant to Art. 17 GDPR,
- the right to restriction of processing pursuant to Art. 18 GDPR,
- the right to object pursuant to Art. 21 GDPR, and
- the right to transfer data pursuant to Art. 35 GDPR.

In addition to the above mentioned, you have the option of contracting the competent supervisory authority.

Contact details of the relevant supervisory authority:

Berliner Beauftragte für Datenschutz und die Informationsfreiheit
Maja Smoltczyk
Friedrichstr. 219
10969 Berlin
Tel.: +49 30 13889-0

Data Protection Information on Applicant Management

Fax: +49 30 2155050

E-Mail: mailbox@datenschutz-berlin.de

8. Automated decision-making process

No automated decision-making process including profiling occurs for the purpose of initiating a contract.

9. Data sources

We process personal data that we receive from you as part of your application. We also process personal data that we are allowed to obtain on the Internet.

10. Escape clause

Our data processing and the legalities are subject to changes, so we will adapt our data protection information from time to time. We will inform you about the changes in due time.