

## **Data Protection Notice: Processing of Applicant Data in Accordance with Articles 12, 13 and 14 of the EU GDPR at SKAD AG**

In the course of the application process, it is inevitable that personal data will be transmitted and processed. This is carried out in accordance with the provisions of the European General Data Protection Regulation (EU GDPR).

With this notice, we fulfil our information obligations under Articles 12, 13 and 14 of the EU GDPR and inform you transparently about:

- which personal data we receive from you and, where applicable, collect ourselves during the application process,
- the purposes for which this data is processed, and
- the rights to which you are entitled in this regard.

### **1. Controller**

The controller within the meaning of the General Data Protection Regulation, other data protection laws applicable in the Member States of the European Union, and other provisions related to data protection, is:

#### **SKAD AG**

Taunustor 1  
60311 Frankfurt am Main

Executive Board: Daniel Schulz

Telephone: +49 69 254247230

Fax: +49 69 87005353

Email: [info@sk-advisory.com](mailto:info@sk-advisory.com)

### **2. Data Protection Officer**

Any data subject may contact our Data Protection Officer directly with any questions or comments regarding data protection. The Data Protection Officer of the controller is:

Elise Mola  
SKAD AG  
Taunustor 1  
60311 Frankfurt am Main  
Email: [datenschutz@sk-advisory.com](mailto:datenschutz@sk-advisory.com)

### **3. Categories and Types of Personal Data**

We only process personal data that is directly related to your application.

The data we process is based on the information and documents you have provided to us, such as your CV, certificates, and other documents relevant to the application. Based on the details you have provided, this may include the following data:

- Basic data (first name, surname, date of birth)
- Contact details (telephone number, email address, postal address)
- Information about your educational and professional background, as well as any further training and similar qualifications
- Special categories of personal data (religious affiliation, existence of a disability, marital status)
- Application photograph

#### 4. Purposes and Legal Basis for processing the Data

##### Processing of Personal Data in the Application Process

If you apply for a position at our company, we process the personal data you provide (e.g. contact details, application documents, qualifications, certificates) solely for the purpose of reviewing and handling your application and carrying out the selection process.

If you give us your explicit consent, your data may be stored in our applicant pool so that we can consider you for future job vacancies. You may withdraw this consent at any time with effect for the future.

If an employment relationship is established with you, your data will also be processed for the purpose of carrying out and managing the employment relationship in compliance with legal requirements. You will be separately informed about this within the scope of your employment.

##### Legal Bases

The processing of your data is carried out on the basis of:

- Art. 6(1)(b) GDPR in conjunction with Section 26(1) BDSG (initiation of an employment relationship),
- Art. 6(1)(f) GDPR (safeguarding legitimate interests such as efficient filling of vacancies, legal defence), and
- Art. 6(1)(a) GDPR in conjunction with Section 26(2) BDSG (consent, e.g. for inclusion in the applicant pool).

The processing of special categories of personal data is based on Art. 9(2)(a) GDPR in conjunction with Section 26(2) BDSG. Such data may include, for example, information on your religious affiliation, health data, or other personal characteristics.

The provision of such information is entirely voluntary. You are under no obligation to provide us with this data as part of your application. However, should you nevertheless supply such information to us, we will consider this to be your active consent to its processing.

#### 5. Source of the Data

We only process the data that you provide to us as part of your application.

#### 6. Recipients of the Data

Within our company, only those employees responsible for the recruitment process have access to your personal data. This includes the staff members of our Human Resources department as well as the relevant colleagues from the respective specialist departments. Access to data is strictly limited to the information necessary for making a well-founded decision regarding the possible establishment of an employment relationship.

In processing your applicant data, we use carefully selected processors who meet the strict requirements of Article 28 of the EU General Data Protection Regulation. These service providers particularly include providers of internet services, applicant management systems, and specialised recruitment software. When selecting and commissioning these service providers, we ensure that they adhere to the highest data protection standards and handle your personal information with the utmost care and confidentiality.

The disclosure of your personal data to external recipients takes place solely under very limited and clearly defined circumstances. This occurs only when statutory provisions expressly permit such transmission, when disclosure is strictly necessary to fulfil legal obligations, or when we have received your explicit consent. We attach the highest importance to protecting your privacy and personal data at all times.

## 7. Duration of Data Storage

We store the personal data you transmit to us as part of your application only for as long as is necessary to decide on the filling of a position.

If no employment relationship is established with you, your application documents and personal data will generally be deleted or anonymised six months after the conclusion of the application process.

Retention for this period serves to protect our legitimate interests, in particular for the defence against possible legal claims (Art. 6(1)(f) GDPR in conjunction with Section 26 BDSG).

### **Applicant Pool**

If you grant us your explicit consent, we will store your data beyond the aforementioned period in our applicant pool in order to consider you for future job vacancies.

In this case, your data will be retained for a maximum **period of 24 months** (or a duration defined by you) and will then be automatically deleted or anonymised, unless you withdraw your consent earlier. You may withdraw your consent at any time with future effect, without any disadvantage to you.

## 8. Applicationtool Personio

You can submit your application to us via the online application portal Personio that we use.

The provider of this tool is:

Personio SE & Co. KG  
Seidlstraße 3  
80335 Munich  
Germany

To ensure the lawful processing of your personal data when using the online tool, a data processing agreement has been concluded with the provider.

You can find Personio's privacy policy, which applies when submitting an application via the online tool we use, [here](#).

## 9. Necessity of providing personal Data

The submission of your personal information is entirely voluntary. You are not obliged to provide us with any data. However, complete and meaningful information is essential for our selection process.

If key information that we require for a well-founded hiring decision is missing, this may result in us being unable to further consider your application. The quality and completeness of your documents form the basis for a fair and transparent evaluation of your application.

## 10. Rights of the data subject

Under the General Data Protection Regulation (GDPR), you have various rights that give you transparency and control over your personal data.

<b>Right</b>	<b>Description</b>
Access (Art. 15)	Learn which data we process about you
Rectification (Art. 16)	Correct inaccurate data
Erasure (Art. 17)	Request deletion of your data, where permitted
Restriction of processing (Art. 18)	Request the restriction of processing
Objection (Art. 21)	Object to the processing of your data
Data portability (Art. 20)	Request your data in a machine-readable format

Please send any such requests to us or directly to our Data Protection Officer.

No automated decision-making takes place.

If we process your personal data on the basis of a legitimate interest in accordance with Art. 6(1)(f) EU GDPR, you may object to this processing at any time, provided that reasons arise from your particular situation.

In such a case, we will carefully review your objection. If we are unable to demonstrate compelling legitimate grounds for the processing that override your rights, freedoms, and interests, we will cease processing your personal data.

You have the right to lodge a complaint with a data protection supervisory authority or to request information. The supervisory authority responsible for us is:

**Der Hessische Beauftragte für Datenschutz und Informationsfreiheit**

Postfach 3163

65021 Wiesbaden

Telephone: +49 611 1408-0

Fax: +49 611 1408-900/901

Email: [poststelle@datenschutz.hessen.de](mailto:poststelle@datenschutz.hessen.de)