

## Obligation to provide information pursuant to Art. 13 and Art. 14 GDPR or Art. 19 FADP for customers

The protection of your data and transparency about its processing is very important to us. Therefore, we hereby comply with our obligation to inform about the circumstances of processing in accordance with Art. 13 and Art. 14 of the General Data Protection Regulation (GDPR) or Art. 19 of the Data Protection Act.

The processing of your personal data gives you the following rights:

- a. Right to information (see Art. 15 GDPR or FADP Art. 25)
- b. Right to rectification (see Art. 16 GDPR or FADP Art. 32)
- c. Right to erasure (see Art. 17 GDPR or FADP Art. 32)
- d. Right to restriction of data (see Art. 18 GDPR or FADP Art. 32)
- e. Right to object (see Art. 21 GDPR or FADP Art. 32)
- f. Right to data portability (see Art. 20 GDPR or FADP Art. 28)

Right of withdrawal: If the processing is based on Art. 6 GDPR (1) (a) or Art. GDPR 9 (2) (a), you have the right to withdraw your consent at any time. Previously processed data remains unaffected by the revocation.

Contact details of the data protection consultant: Jasmin Muhmenthaler-Sturm, Datenbeschützerin GmbH, Unterer Sand 9, 94209 Regen, E-Mail: [info@datenbeschuetzerin.de](mailto:info@datenbeschuetzerin.de), Tel: 0 99 21 88 22 9000

You have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data is unlawful.

Federal Data Protection and Information Commissioner  
Feldeggweg 1  
CH - 3003 Bern  
Phone: 058 462 43 95

The data controller is:

Nanosurf AG  
Represented by: Mr. Dominik Ziegler  
Gräubernstrasse 12-14  
4410 Liestal  
Phone: +41 61 927 47 47  
Email: [info@nanosurf.com](mailto:info@nanosurf.com)

The controller is the natural or legal person who, alone or jointly with others, decides on the purposes and means of the processing of personal data (e.g. names, e-mail addresses, etc.).

Data will only be transferred to third countries (countries outside the European Economic Area – EEA) if this is necessary for the execution of the service contract or if you have given us your consent or if this is otherwise legally permissible. In this case, we take measures to ensure the protection of your data, for example through contractual arrangements. We only transmit data to recipients who ensure the protection of your data in accordance with the provisions of the GDPR for transmission to third countries (Art. 44 to 49 GDPR or FADP Art. 16 and Art. 17).

The decision on our contractual relationship is not based on automated processing or profiling, i.e. there is no automated decision-making within the meaning of Art. 22 GDPR for the establishment, implementation and processing of the contractual relationship.

If this procedure is used in individual cases, we will inform you separately if this is required by law.

Within the framework of our customer relationship, only the personal data that is necessary for the establishment, implementation and termination of the customer relationship and the fulfilment of the associated contractual obligations or that we are legally obliged to collect are to be provided. Without this data, we will otherwise generally not be able to perform the contract or customer relationship with you.

As a rule, we collect your personal data directly from you. If, exceptionally, data comes from other sources, you will be informed separately.

## Data processing in the context of Data processing

### Order entry and processing

In order to process your order or enquiry, we collect personal data from contact persons (name, address, e-mail address, telephone number, mobile phone number) as part of the process. Your data will be entered and stored in our central system.

For the written activity planning of our projects, we have a weekly plan, which may also contain personal data in the form of customer master data and project information.

The processing is based on a contract or pre-contractual measure in accordance with Art. 6 (1) (b) GDPR or Art. 31 (2) a FADP (contract processing).

This is forwarded internally to the necessary departments and, if necessary, to external bodies (e.g. legal advice, press) that are subject to secrecy / (e.g. shipping service providers/business partners/subcontractors) in order to be able to continue processing the order. We have commissioned an external service provider for the technical support of our IT systems: Tschanz und Partner GmbH, Schneckelerstrasse 9, 4414 Füllinsdorf. A data processing agreement has been concluded with the service provider.

The data is stored within the framework of the statutory retention obligations. If no contractual relationship is established, your data will be deleted after one year without active contact.

### Ordering and Shipping

Personal data is collected for ordering and shipping in order to be able to assign the goods to the customers. If you order directly through us, you will receive a delivery note created by us. For the processing of the shipment, your data (name, address) will be transmitted to the shipping service provider.

The processing is based on a contract or pre-contractual measure in accordance with Art. 6 (1) (b) GDPR or Art. 31 (2) a FADP (contract processing).

The data will be passed on to internal bodies as well as to the shipping service provider.

The data is stored within the framework of the statutory retention obligations.

## Digital signing of documents

To simplify contract signing, we use digital signature solutions or providers of electronic signatures. We use your e-mail address to send the digital document.

As part of the signing, your digital signature, timestamp and name will be processed and stored.

We use the following provider to carry out the digital signature: Adobe Systems Software Ireland Limited, 4-6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland.

The company is certified according to the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified according to the DPF is committed to complying with these data protection standards. For more information, please contact the provider at the following link: <https://www.dataprivacyframework.gov/list>

Your data is processed on the basis of a legitimate interest in accordance with Art. 6 (1) (f) GDPR or Art. 31 FADP (overriding interest). The controller pursues the goal of efficient, paperless management and signing of contracts and documents. In addition, the processing is based on the implementation of pre-contractual measures or the performance of a contract in accordance with Art. 6 (1) (b) GDPR or Art. 31 (2) a FADP (contract processing). If qualified electronic signatures are used, the processing is also carried out on the basis of legal obligations in accordance with Art. 6 (1) (c) GDPR or Art. 31 (1) FADP legal requirement.

The data is stored internally. A data processing agreement has been concluded with the provider of the signature solution in accordance with Art. 28 GDPR and Art. 9 DSG.

The documents and documents are stored in accordance with the statutory retention periods

## Communication

To get in touch with you, we will send you an e-mail with further information, to process your request, your order or as part of our general business relationship. For this purpose, your e-mail address, the e-mail content and the history of communication are recorded. The e-mails are hosted by an external service provider. The provider is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. A data processing agreement has been concluded with the provider.

The company is certified according to the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified according to the DPF is committed to complying with these data protection standards. For more information, please contact the provider at the following link: <https://www.dataprivacyframework.gov/list>

Furthermore, we can also call you by phone via the telephone or mobile phone number we have on file.

The processing of the data is based on the performance of the contract in accordance with Art. 6 (1) (b) GDPR or Art. 31 (2) a FADP (contract processing), which permits the processing of data for the performance of a contract or pre-contractual measures (customer relationship, contracts with business partners).

The data will only be passed on if this has been agreed with you or is necessary for the current business transaction.

Your data will be stored by us on our systems within the framework of the statutory retention obligation.

## Data processing as Data processing

### IT administration on behalf of

In order to process your order or enquiry, we collect personal data from contact persons (name, address, e-mail address, telephone number, mobile phone number) as part of the process. Depending on the order, the controller receives access to and insight into the client's systems and thus also personal data, if necessary.

For the written activity planning of our projects, we have a plan in our calendar, which may also contain personal data in the form of customer master data and project information.

The order is forwarded internally to the necessary departments and, if necessary, to external bodies (e.g. shipping service providers/business partners/subcontractors/manufacturers) in order to be able to process the order further.

The data is stored within the framework of the statutory retention obligations. At the latest upon termination of the service agreement, documents that have come into possession, the processing and usage results created as well as data stocks that are related to the contractual relationship must be handed over to the Client or, after prior consent, destroyed in accordance with data protection regulations.

### Remote-Support

In the event of access to a computer, there is the possibility of using remote software. The provider of the remote software is: TeamViewer Germany GmbH, Bahnhofplatz 2, DE-73033 Göppingen. Access is only granted by explicit permission of the user on the computer. It is possible for the IT support that connects to the computer to gain access to personal information.

The processing of the data is based on a business purpose in accordance with Art. 6 (1) (f) GDPR or Art. 31 DSG (overriding interest). The controller has a legitimate interest in ensuring the availability and confidentiality of the network and the IT infrastructure.

Management and IT service providers (see above) have access to the data for analysis in the event of an error. We have concluded a data processing agreement with the IT service provider and the provider of the remote software.

Your personal data will be stored for a period of up to 365 days as part of the processing.

# Data Processing in IT Systems

## Contact and address management

In order to manage all contact information of business partners and customers, we store the contacts in our system, in which: name, contact person if applicable, address, telephone number, mobile phone number and e-mail address are stored. The provider of the system is: HubSpot, Inc., 25 First Street, Cambridge, MA 02141 USA.

The company is certified according to the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified according to the DPF is committed to complying with these data protection standards. For more information, please contact the provider at the following link: <https://www.dataprivacyframework.gov/list>

The data collection is based on a legitimate interest in accordance with Art. 6 (1) (f) GDPR or Art. 31 FADP (overriding interest) in order to manage the contact information of employees and business partners in an organized manner.

Only our employees have access to this system. The external service provider Tschanz und Partner GmbH, Schneckelerstrasse 9, 4414 Füllinsdorf, was used for technical support. A data processing agreement has been concluded with the service provider.

Your contact details will be stored in our system for the duration of the business relationship and for one year thereafter.

## Audio and video conferencing

### Data processing

For communication with our customers, we use online conference tools, among other things. The specific tools we use are listed below. If you communicate with us via video or audio conference via the Internet, your personal data will be collected and processed by us and the provider of the respective conference tool.

The conference tools collect all data that you provide/use to use the tools (e-mail address and/or your telephone number). In addition, the conference tools process the duration of the conference, the start and end (time) of participation in the conference, the number of participants and other "contextual information" related to the communication process (metadata).

Furthermore, the provider of the tool processes all technical data required to handle online communication. This includes, but is not limited to, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or speakers, and the type of connection.

If content is exchanged, uploaded or otherwise made available within the tool, this is also stored on the servers of the tool providers. Such content includes, but is not limited to, cloud recordings, chat/instant messages, voicemails, photos and videos uploaded to voicemails, files, whiteboards, and other information shared while using the Service.

Please note that we do not fully influence the data processing processes of the tools used. Our options are largely based on the corporate policy of the respective provider. Further information on data processing by the conference tools can be found in the privacy policies of the respective tools used, which we have listed below this text.

### Purpose and legal basis

The conference tools are used to communicate with prospective or existing contractual partners or to offer certain services to our customers (Art. 6 para. 1 lit. b GDPR or Art. 31 (2) a FADP (contract processing)). Furthermore, the use of the tools serves to generally simplify and accelerate communication with us or our company (legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR or Art. 31 FADP (overriding interest)). If consent has been requested, the use of the tools in question is based on this consent; consent can be revoked at any time with effect for the future.

### Storage period

The data collected directly by us via the video and conference tools will be deleted from our systems as soon as you ask us to delete it, revoke your consent to its storage or the purpose for which it was stored no longer applies. Stored cookies remain on your device until you delete them. Mandatory statutory retention periods remain unaffected.

We have no influence on the storage period of your data, which is stored by the operators of the conference tools for their own purposes. For details, please contact the operators of the conference tools directly.

### Conference tools used

We use the following conference tools:

#### Zoom

We use Zoom. The provider of this service is Zoom Communications Inc., San Jose, 55 Almaden Boulevard, 6th Floor, San Jose, CA 95113, USA. Details on data processing can be found in Zoom's privacy policy: <https://zoom.us/de-de/privacy.html>.

The data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://zoom.us/de-de/privacy.html>.

#### Data processing

We have concluded an Data processing agreement (DPA) with the above-mentioned provider. This is a contract required by data protection law that ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

The company is certified according to the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified according to the DPF is committed to complying with these data protection standards. For more information, please contact the provider at the following link: <https://www.dataprivacyframework.gov/list>

## GoToMeeting

We use GoToMeeting. The provider is LogMeIn, Inc., 320 Summer Street Boston, MA 02210, USA. Details on data processing can be found in GoToMeeting's privacy policy: <https://www.logmeininc.com/de/legal/privacy>.

The data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://logmeincdn.azureedge.net/legal/lmi-customer-dpa-2020v1-de.pdf>.

## Data processing

We have concluded an Data processing agreement (DPA) with the above-mentioned provider. This is a contract required by data protection law that ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

The company is certified according to the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified according to the DPF is committed to complying with these data protection standards. For more information, please contact the provider at the following link: <https://www.dataprivacyframework.gov/list>

## Microsoft Teams

We use Microsoft Teams. The provider is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. Details on data processing can be found in the Microsoft Teams privacy policy: <https://privacy.microsoft.com/de-de/privacystatement>.

## Data processing

We have concluded an Data processing agreement (DPA) with the above-mentioned provider. This is a contract required by data protection law that ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

The company is certified according to the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified according to the DPF is committed to complying with these data protection standards. For more information, please contact the provider at the following link: <https://www.dataprivacyframework.gov/list>

## File exchange via OneDrive

We use OneDrive to exchange files with you. The provider is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA (hereinafter referred to as "OneDrive").

OneDrive allows us to include a folder structure on our system where you can upload content. When you upload content, it is stored on OneDrive's servers. It also connects to OneDrive so that OneDrive can determine that you have visited our system.

The use of OneDrive is based on Art. 6 para. 1 lit. f GDPR or Art. 31 FADP (overriding interest). The controller has a legitimate interest in a reliable and efficient data exchange system.

### Data processing

We have concluded an Data processing agreement (DPA) with the above-mentioned provider. This is a contract required by data protection law that ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

The company is certified according to the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified according to the DPF is committed to complying with these data protection standards. For more information, please contact the provider at the following link: <https://www.dataprivacyframework.gov/list>

### IT ticket system

To ensure IT support, to prioritize and document requests, we use a ticket tool in IT. When you submit a ticket, we record the following from the processor: surname, first name. From the requester we record: surname, first name, department. Depending on the type of error, personal data may also be included in the error description itself.

The processing of the data is based on a business purpose in accordance with Art. 6 (1) (f) GDPR or Art. 31 FADP (overriding interest). The controller has a legitimate interest in optimizing IT processes.

The data will be processed in the IT department and, if necessary, passed on to an external support service provider for processing the case. An Data processing agreement was concluded with the external IT support and the provider of the ticket system.

Your personal data will be stored as part of the processing and then deleted. Statutory retention periods remain unaffected.

### Guest Wi-Fi

We offer our guests the possibility of internet access. For this purpose, you will receive access to our guest Wi-Fi. You can get access by asking the managing director or a responsible employee.

Your name and the log data will be stored in our system.

The use of the Wi-Fi is based on voluntary consent in accordance with Art. 6 (1) (a) GDPR, Art. 6 DSG (no consent required). You can revoke your consent informally at any time. However, this will result in you no longer being able to use internet access.

The data will only be passed on if this has been agreed with you or is necessary for the current incident.

The log data is stored for three months and then deleted from the system.

## Sales & Marketing

### Newsletter and postal advertising

We regularly send our customers newsletters and brochures with product information and new service offerings. For shipping, we use your address or e-mail address stored with us, which we received at the beginning of our business relationship. The newsletter is sent via a newsletter service provider (see below).

Your data will be processed by us on the basis of a legitimate interest in accordance with Art. 6 (1) (f) GDPR or Art. 31 FADP (overriding interest). The controller has a legitimate interest in transmitting new technologies, process applications, new products or service offers to its customers. Sending e-mails or advertising to our existing customers is permitted.

If you do not wish to receive advertising, you can object to the further use of your data for advertising purposes at any time by message (e-mail, post). The data you provide to us for the purpose of subscribing to the newsletter will be stored by us or the newsletter service provider until you unsubscribe from the newsletter and will be deleted from the newsletter distribution list after you have unsubscribed from the newsletter. Data that has been stored by us for other purposes remains unaffected by this.

After you have unsubscribed from the newsletter distribution list, your e-mail address may be stored in a blacklist by us or the newsletter service provider in order to prevent future mailings. The data from the blacklist will only be used for this purpose and will not be merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR, Art. 31 FADP (overriding interest)). The storage in the blacklist is not limited in time. You can object to the storage if your interests outweigh our legitimate interest.

### HubSpot

We use HubSpot to send newsletters. The provider is HubSpot, Inc., 25 First Street, Cambridge, MA 02141 USA.

HubSpot is a service that can be used to organize and analyze the sending of newsletters, among other things. The data you enter for the purpose of subscribing to the newsletter will be stored on HubSpot's servers.

### Data analysis by HubSpot

With the help of HubSpot, we are able to analyze our newsletter campaigns. For example, we can see whether a newsletter message has been opened and which links have been clicked, if any. In this way, we can determine, among other things, which links have been clicked on particularly often.

In addition, we can see whether certain predefined actions have been carried out after opening/clicking (conversion rate). For example, we can see if you have made a purchase after clicking on the newsletter.

HubSpot also allows us to cluster newsletter recipients based on different categories. The newsletter recipients can be divided by age, gender or place of residence, for example. In this way, the newsletters can be better adapted to the respective target groups. If you do not

want HubSpot to analyze the newsletter, you must unsubscribe from the newsletter. For this purpose, we provide a corresponding link in each newsletter message.

The data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://www.hubspot.de/data-privacy/privacy-shield>.

The company is certified according to the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified according to the DPF is committed to complying with these data protection standards. Further information on this can be obtained from the provider under the following link: <https://www.dataprivacyframework.gov/participant/5812>.

## Data processing

We have concluded an Data processing agreement (DPA) with the above-mentioned provider. This is a contract required by data protection law that ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

## Exhibition stand

In order to be able to provide you with further information about our companies and offers as well as services after the fair, we will collect the following data from you at our booth: name, e-mail address, telephone number / mobile number. The data is then entered into our CRM system.

The processing is based on a contract or pre-contractual measure in accordance with Art. 6 (1) (b) GDPR or Art. 31 (2) a FADP (contract processing).

Only our employees have access to our system. We have hired an external service provider for the technical support of the CRM system: HubSpot, Inc., 25 First Street, Cambridge, MA 02141 USA. A data processing agreement has been concluded with the service provider.

# Financial accounting

## Financial accounting

To handle financial accounting, we mapped a process in the company in our IT systems. In the course of the process, personal data of contact persons or billing information (name, address, e-mail address, telephone number, mobile phone number) may be processed.

The processing is based on a legal requirement in accordance with Art. 6 (1) (c) GDPR or Art. 31 (1) DSG legal requirement. The processing is necessary for compliance with a legal obligation to which the controller is subject (principles of proper accounting).

It will be forwarded to our responsible tax advisor.

The data is stored within the framework of the statutory retention obligations.

## Dunning

In the case of outstanding claims, these will be warned and, in the event of non-payment, transmitted to service providers (lawyer, debt collection agency). For this purpose, name, address and the amount of the outstanding claim are required.

The processing is based on a contract or pre-contractual measure in accordance with Art. 6 (1) (b) GDPR or Art. 31 (2) a FADP (contract processing).

It is forwarded to the service provider (lawyer, debt collection agency, etc.).

The data is stored within the framework of the statutory retention obligations.

## Credit checks

In the case of a purchase on account or another payment method for which we make advance payments, we may carry out a credit check procedure (scoring). For this purpose, we transmit the data you enter (e.g. name, address, age or bank details) to a credit agency. Based on this data, the probability of default is determined. In the event of an excessive risk of non-payment, we may refuse the payment method in question.

The credit check is carried out on the basis of the fulfilment of the contract (Art. 6 para. 1 lit. b GDPR or Art. 31 (2) a FADP) and to avoid payment defaults (legitimate interest according to Art. 6 para. 1 lit. f GDPR or Art. 31 (1) FADP). If consent has been obtained, the credit check is carried out on the basis of this consent (Art. 6 para. 1 lit. a GDPR, Art. 6 FADP); consent can be revoked at any time.

## Sanction list check

EU companies are prohibited from checking and cross-checking employee data and business contacts for matches with the names on the sanctions lists. Sanctions lists are based on various EU regulations (including EU Regulation 2580/2001), the so-called anti-terrorism regulations and contain names of persons, companies and states against which sanctions have been imposed for foreign or security policy reasons. For this purpose, the name of the data subject is processed.

The review is carried out on the legal basis of Art. 6 (1) (c) GDPR (Art. 31 (1) FADP) or Art. 6 (1) (f) GDPR (Art. 31 FADP). The controller has a legitimate interest in not entering into business relationships with sanctioned persons.

The data will only be passed on if this has been agreed with you or is necessary for the current business transaction.

Your data will be stored by us on our systems within the framework of the statutory retention obligation.

## Miscellaneous

### Paper and file disposal / data carrier disposal

The destruction of paper documents and data carriers containing personal data that are no longer required is carried out. This means that the deletion periods after the retention period are met.

All data from the customer relationship can be found on the documents and paper carriers.

The processing of the data is based on a legal requirement pursuant to Art. 6 (1) (c) GDPR or Art. 31 (1) DSG legal requirement. The processing is necessary for compliance with a legal obligation to which the controller is subject.

The data will be passed on to the certified disposal companies Tschanz und Partner GmbH, Schneckelerstrasse 9, 4414 Füllinsdorf for data carriers and REISSWOLF International GmbH, Wilhelm-Bergner-Straße 3 A, DE-21509 Glinde for the disposal of files, which the responsible party commissions with the destruction and disposal. An Data processing agreement was concluded with the service provider.

The data is not stored.

### Data protection management

You can contact the external data protection consultant at any time by e-mail at [info@datenbeschuetzerin.de](mailto:info@datenbeschuetzerin.de) or by phone at 09921 88 22 9000.

Your name, reason for the request, facts, and any data stored in the system of the person concerned will be collected and stored.

The processing of the data is based on the performance of the contract in accordance with Art. 6 (1) (b) GDPR or Art. 31 (2) a FADP (contract processing), which permits the processing of data for the performance of a contract or pre-contractual measure (service contract, employment contract).

The information will only be passed on with your consent.

Your personal data will be stored for as long as necessary for the purpose. Statutory retention obligations remain unaffected.

## Application

### Handling of applicant data

We offer you the opportunity to apply to us (e.g. by e-mail, post or via the online application form). In the following, we inform you about the scope, purpose and use of your personal data collected as part of the application process. We assure you that the collection, processing and use of your data will be carried out in accordance with applicable data protection law and all other legal provisions and that your data will be treated in the strictest confidence.

## Scope and purpose of data collection

If you send us an application, we will process your associated personal data (e.g. contact and communication data, application documents, notes in the context of job interviews, etc.) insofar as this is necessary to decide on the establishment of an employment relationship. The legal basis for this is § 26 BDSG under German law (initiation of an employment relationship), Art. 6 (1) (b) GDPR (general contract initiation) or Art. 31 (2) a DSG (contract processing) and – if you have given consent – Art. 6 (1) (a) GDPR or Art. 6 DSG (no consent required). The consent can be revoked at any time. Your personal data will only be passed on within our company to persons who are involved in processing your application.

If the application is successful, the data submitted by you will be stored in our data processing systems on the basis of § 26 BDSG and Art. 6 (1) (b) GDPR or Art. 31 (2) a DSG (contract processing) for the purpose of carrying out the employment relationship.

## Data retention period

If we are unable to make you a job offer, you reject a job offer or withdraw your application, we reserve the right to store the data you provide on the basis of our legitimate interests (Art. 6 para. 1 lit. f GDPR or Art. 31 FADP (overriding interest)) for up to 6 months from the end of the application process (rejection or withdrawal of the application). The data will then be deleted and the physical application documents destroyed. The storage serves in particular for the purpose of providing evidence in the event of a legal dispute. If it is evident that the data will be required after the expiry of the 6-month period (e.g. due to an imminent or pending legal dispute), deletion will only take place when the purpose for further storage no longer applies.

Longer storage may also take place if you have given your consent (Art. 6 para. 1 lit. a GDPR or Art. 6 FADP (no consent required)) or if statutory retention obligations preclude deletion.

## Inclusion in the applicant pool

If we do not make you a job offer, there may be the possibility of including you in our applicant pool. In the event of admission, all documents and information from the application will be transferred to the applicant pool in order to contact you in the event of suitable vacancies.

Admission to the applicant pool takes place exclusively on the basis of your explicit consent (Art. 6 para. 1 lit. a GDPR or Art. 6 FADP (no consent required)). The submission of consent is voluntary and has no relation to the ongoing application process. The data subject can revoke his consent at any time. In this case, the data will be irrevocably deleted from the applicant pool, unless there are legal retention reasons.

The data from the applicant pool will be irrevocably deleted no later than two years after consent has been granted.