

## Data Protection Declaration for Applicants

Data Protection has a particularly high priority for our Company. In the following, we provide information about the collection of personal data when using our website and in connection with other offers of our Company. The data processing described herein can be found in the table of contents that we have prefixed to this data protection declaration.

### Definitions

Our Data Protection Declaration is intended to be simple and understandable for everyone. In this Data Protection Declaration, the official terms of the General Data Protection Regulation (GDPR) or the Federal Data Protection Act (BDSG) are used. The official definitions are explained in Art. 4 GDPR or Sec. 26 BDSG. According to these, personal data is all data that can be related to you personally, e.g. name, address, e-mail addresses, user behavior (cf. Art. 4 No. 1 GDPR).

### Legal Basis

The processing of personal data can be based on various legal bases. If we absolutely require your data for the purpose of deciding on the establishment of an employment relationship with you, the legal basis for the processing is Sec. 26 (1) sentence 1 BDSG.

If we obtain your consent for certain data processing, the legal basis is Art. 6 (1) lit. a GDPR or on case of special categories of personal data Art. 9 (2) lit. a GDPR.

We carry out some data processing on the basis of our and/or the legitimate interests of third parties, whereby a balancing of your interests worthy of protection and the legitimate interest in the data processing is always carried out. The legal basis for this is Art. 6 (1) lit. f GDPR.

Insofar as the processing is necessary for the fulfillment of a legal obligation to which we are subject, the legal basis is Art. 6 (1) lit. c GDPR or for special categories of personal data Art. 9 (2) lit. b GDPR.

None of the data processing described below is carried out in the context of automated decision-making, which means that we evaluate your application personally and the decision about your application is not based solely on automated processing.

The provision of personal data is neither legally nor contractually required, nor are you obliged to provide us with your personal data. However, the provision of personal data is required for the conclusion of a contract for employment with us. This means that if you do not provide us with personal data when applying for a job, we cannot and will not enter into an employment relationship with you. Such an application would be futile.

If information is processed on the basis of your consent, it is provided voluntarily. However, we cannot, for example, provide you with the benefits of a severely disabled status if you do not provide information about any existing severe disability.

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## 1 Controller for Data Processing

The Controller pursuant to Art. 4 No. 7 GDPR for the processing of personal data described herein is

riskmethods GmbH,  
Balanstraße 49,  
81669 München,  
Deutschland

E-Mail: [info@riskmethods.net](mailto:info@riskmethods.net)  
(hereinafter also "we")

Further information can be found in our [Imprint](#)

## 2 Contact Possibility of the Data Protection Officer

You can reach our data protection officer at [privacy@riskmethods.net](mailto:privacy@riskmethods.net) or our postal address with the addition of "the Data Protection Officer".

## 3 Your Application Documents

In order to decide on the chances of success of an application, the provision of personal data is desired and also necessary. We require name and contact details, date of birth, place of birth, details of professional circumstances, professional qualifications, professional experience, certificates and details of other special qualifications in accordance with the specific job advertisement (such as language skills, driving license).

You can provide us with further information voluntarily, but it is not a prerequisite for consideration of an application. Failure to provide this information will not result in any disadvantages for you. This voluntary information also includes application photos, for example.

Your application documents will be stored and processed digitally by us (see section 4.2). This applies regardless of how you send us your application documents, i.e. in particular also for applications sent to us by post.

The legal basis for this processing is Sec. 26 (1) Sentence 1 of the BDSG, insofar as it concerns information that we request from you as part of the application process for the establishment of an employment relationship with us. If you voluntarily provide us with further information in your application documents, we will process this on the basis of your consent, Art. 6 (1) lit. a GDPR in connection with Sec. 26 (2) BDSG.

Please note that especially resumes, cover letters or other data provided by you for the purpose of the interview may also regularly contain information about "special categories of personal data" as defined in Article 9 (1) of the GDPR (e.g., a photo that reveals ethnic origin, information about severely disabled status, etc.). If you send us information of this kind, you agree that we may store this information as part of your application documents, Art. 9 (2) lit. a GDPR in connection with Sec. 26 (2) BDSG. Any processing of your personal data that goes beyond the storage will only take place if expressly described in this Data Protection Declaration.

If special legal obligations arise for us from health-related information, such as information about a severely disabled person, we will process this data on the basis of Art. 9 (2) lit. b GDPR in connection with Sec. 26 (3) BDSG in order to comply with these legal obligations.

## 4 Cooperation with Personnel Service Providers and Applicant Platforms

We may also work with external personnel service providers to fill positions in our company and place advertisements on applicant platforms. Under certain circumstances, we may have received and evaluated certain of your personal data from these third parties before contacting you on our part. In view of our contractual agreements with the personnel service providers and the applicant platforms, we assume that you have also concluded agreements with them regarding the provision of your personal data to us as a potentially interesting or interested employer, or that you have initiated the transfer of your data to us yourself.

In this respect, please also note the data protection notices of the relevant personnel service providers or applicant platforms. Depending on the structure of these data protection notices, it is possible that the personnel service providers or applicant platforms may provide us with further profile information in addition to your application documents.

The legal basis for the transfer of your personal data to us is our legitimate interest in the broadest possible selection of qualified applicants in accordance with Art. 6 (1) f GDPR. We will process data that we obtain in this way from sources other than you directly in the same way as applications that you send to us directly without involving personnel service providers or applicant platforms. However, where available, we may use direct communication channels, e.g. from applicant platforms, to exchange messages with you. After receiving your personal data, we will process it in the same way as we would process it here in the case of an application sent directly to us.

Please note that we will not inform you again in detail about the source of your application after we have received it via a personnel service provider or an applicant platform. Because you initiated this application yourself via a specific personnel service provider or applicant platform, or were in any case in contact with this personnel service provider or applicant platform in advance, you already have the information as to where we obtained your data; it is therefore not necessary to inform you again for legal reasons alone, Art. 14 (5) lit. a GDPR. Of course, we will still be happy to inform you upon request at any time about who exactly we have received your personal data from.

## 5 Application Management via Workable

As a general platform for managing the application process (e.g. finding and evaluating applicants, data storage and recruitment), we use the solution of Workable Software, 95-97 Leoforos Kifissias, 15125 Marousi, Greece. Workable may process your personal data only in accordance with our instructions. We have entered into a corresponding data protection agreement within the meaning of Art. 28 GDPR with Workable and ensure that your data is processed lawfully in this context.

All personal data provided to us as part of the application process, including your application documents, will be stored in the Workable platform and further processed by us. Upon receipt of your application, we will send you an email confirming receipt of your application. You may withdraw your application by using the link at the bottom of this email. After you have confirmed that you wish to withdraw your application, your application and any personal data you have provided to us up to that point will be removed from the Workable Platform. This ability to withdraw an application will end once you have moved on in the application process or we have assessed your application. If you still want to withdraw your application at that time, you can write an email to [privacy@riskmethods.net](mailto:privacy@riskmethods.net) to request the deletion of your application data.

## 6 TalentPool

If you do not apply to a specific job posting with us, or if we select someone else for the specific job posting but would still like to consider your application for future openings, we may add you to our TalentPool at Workable (see Section 5).

However, this requires that you give us your express consent within the meaning of Art. 6 (1) lit. a, 9 (2) lit. a GDPR in connection with Sec. 26 (2) BDSG. In such a case, we will request this separately

from you. In all other respects, the general data protection information also applies accordingly in these cases.

## 7 Recommendation by Employees (Referrals)

We encourage all our colleagues to recommend suitable candidates to us for filling vacancies. Our referral process requires that our colleagues provide us with your application documents exclusively on the basis of your consent. We will only process the data we receive about our colleagues for the purposes of the application process, as described in this Privacy Policy.

## 8 Research on your Professional Background

On the basis of Art. 6 (1) f GDPR, we reserve the right to collect further information about your professional career, your previous employers or further qualifications from other sources. For this purpose, we will evaluate information in professional social media networks (e.g. LinkedIn, XING) as described below and compare it with the information in your application documents or process it for the purposes of the application process as described herein, if you have created a publicly accessible profile there yourself and stored such information there.

Such further evaluation serves our legitimate interest in getting to know our potential future employees better even before an interview. However, we will only carry out such evaluations once we have already made a pre-selection of all applications. We will only obtain further information as described above about applicants whom we would like to get to know better after such a pre-selection.

## 9 Personnel Selection Interviews

### 9.1 General Information

As part of our personnel selection interviews, we invite those applicants who appear to be best suited for the vacant position based on their application documents. In these interviews, we would like to get to know the applicants and their qualifications even better. The legal basis for the information provided in this way in addition to the application documents is Sec. 26 (1) Sentence 1 of the BDSG, insofar as the information contains more specific details and explanations of your professional career.

If we also request information from you (e.g. on soft skills, your expectations and ideas with regard to a possible job for us), we collect this information on the basis of our legitimate interest in being able to assess our future colleagues as well as possible before deciding on the establishment of an employment relationship and thus to optimally fill an advertised position, Art. 6 (1) lit. f GDPR, Sec. 26 (1) Sentence 1 BDSG.

### 9.2 Conversations via Online Conference

We would like to inform you below about the processing of personal data in connection with the use of "Microsoft Teams". We use the "Microsoft Teams" tool to conduct personnel selection interviews by means of video conference (hereinafter: "Online Meetings"). As a rule, we offer the possibility of such Online Meetings as an option in addition to a classic job interview at our location, and only in exceptional cases do we ask applicants exclusively for a job interview as an Online Meeting.

"Microsoft Teams" is a service of Microsoft Corporation or, for users located in the EU, Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland.

If you access the "Microsoft Teams" website, the "Microsoft Teams" provider is responsible for data processing. However, calling up the Internet page is only necessary for using "Microsoft Teams" in order to download the software for using "Microsoft Teams". If you do not want to or cannot use the "Microsoft Teams" application, you can also use "Microsoft Teams" via your browser. The service

will then also be provided via the "Microsoft Teams" website to this extent. In principle, it may also be possible to participate in Online Meetings by telephone; however, we would like to ask you to participate in the context of an Online Meeting via the "Microsoft Teams" application or via the browser and, in particular, to switch on your camera.

When using "Microsoft Teams", various types of data are processed. The scope of the data also depends on the data you provide before or during participation in an Online Meeting. The following personal data are subject to processing:

- User details: e.g. display name, e-mail address if applicable, profile picture (optional), preferred language
- Meeting metadata: e.g. date, time, meeting ID, phone numbers, location
- Text, audio and video data: You may have the option of using the chat function in an "Online Meeting". To this extent, the text entries you make are processed in order to display them in the "Online Meeting". In order to enable the display of video and the playback of audio, the data from the microphone of your terminal device and from any video camera of the terminal device will be processed accordingly for the duration of the meeting. You can turn off or mute the camera or microphone yourself at any time via the "Microsoft Teams" application or the browser application.

As a rule, we will not record Online Meetings. If, exceptionally, we want to record an Online Meeting, we will inform you transparently in advance and ask for your consent. If it is necessary for the purpose of recording the results of an Online Meeting, we will record the chat content. However, this will usually not be the case. The legal basis for data processing when conducting Online Meetings as part of job interviews is Sec. 26 (1) Sentence 1 of the BDSG, as well as our legitimate interest in application management that saves time and resources, including for our applicants (Art. 6 (1) lit. f GDPR).

Personal data processed in connection with participation in Online Meetings will generally not be disclosed to third parties unless required for technical reasons. The provider of "Microsoft Teams" necessarily obtains knowledge of the above-mentioned data insofar as this is provided for in the context of our order processing agreement with Microsoft. Data processing outside the European Union (EU) does not take place as a matter of principle, as we have restricted our storage location to data centers in the European Union. However, we cannot exclude the routing of data via Internet servers that are located outside the EU. This may be the case in particular if Online Meeting participants are located in a third country. However, the data is encrypted during transport over the Internet and thus protected against unauthorized access by third parties.

## 10 Reimbursement of Travel Expenses

If you have traveled to a personnel selection interview, we will generally reimburse the travel expenses incurred by you and proven to us. For this purpose, we process the necessary additional information on the basis of Section 26 (1) Sentence 1 of the German Federal Data Protection Act (BDSG), namely your bank account details, information on travel expense reimbursement claims incurred including receipts (cab, fuel receipt, train ticket or similar).

## 11 Communication with you and Internal Notes

To the extent necessary for the application process and the decision on filling the position, we also process data on the basis of Sec. 26 (1) Sentence 1 of the BDSG in the course of correspondence with you in writing or in electronic form. Furthermore, we will make internal notes for the purpose of internal coordination and, if necessary, to provide evidence of proper, in particular non-discriminatory, decision-making, for example after reviewing your application documents or after a personnel selection interview.

## 12 Defense of Legal Claims arising from the Application Process

Furthermore, we may process personal data about you insofar as this is necessary to defend asserted legal claims against us arising from the application process. The legal basis for this is Art. 6 (1) lit. f GDPR; the legitimate interest is, for example, a duty to provide evidence in proceedings due to an alleged violation of the German General Equal Treatment Act (AGG).

## 13 Further Processing in the event of the Establishment of an Employment Relationship

Insofar as an employment relationship arises between you and us, we may, in accordance with Sec. 26 (1) Sentence 1 of the BDSG, further process the personal data already received from you for the purposes of the employment relationship if this is necessary for the performance or termination of the employment relationship or for the exercise or fulfillment of the rights and obligations of the employee representative body resulting from a law or a collective agreement, a company agreement or a service agreement (collective agreement).

## 14 Storage Period

We process the aforementioned data for the duration of the application process as well as for a period of six months after the job has been filled, unless otherwise specified below. Insofar as an employment relationship between you and us does not come into being, we may also continue to store data insofar as this is necessary for the defense against possible legal claims.

We process data in our applicant database for a period of twelve months on the basis of your separate consent. If we consider applications from our database in the context of specific job filling procedures, the general information on the storage period applies accordingly.

Data that we process for you as part of the reimbursement of travel expenses may be stored for a period until the end of the tenth calendar year following the date of reimbursement due to commercial and tax retention obligations. We are legally obligated to do so, and data processing for this purpose is based on Art. 6 (1) lit. c GDPR.

## 15 Data Disclosure

### 15.1 General Principles of Disclosure

We do not disclose your personal data to third parties for purposes other than those listed herein. We will only disclose your personal data to third parties within the scope of the above-mentioned purposes if:

- you have given your express consent in accordance with Art. 6 (1) lit. a, if applicable Art. 9 (2) lit. a GDPR in connection with. Sec. 26 (2) BDSG,
- the disclosure is necessary for the assertion, exercise or defense of legal claims pursuant to Art. 6 (1) lit. f GDPR and there is no reason to assume that you have an overriding interest worthy of protection in the non-disclosure of your data,
- in the event that a legal obligation exists for the disclosure pursuant to Art. 6 (1) lit. c GDPR, or Art. 9 (2) lit. b GDPR, as the case may be, as well as
- this is legally permissible and required in accordance with Sec. 26 (1) Sentence 1 BDSG for the processing of any employment relationship established with you.

### 15.2 Personnel Service Providers / Technical Service Providers

We may cooperate with personnel service providers and applicant platforms (see section 4) in the preparation and implementation of application procedures, to which we may transfer your data if required for the purposes described above.

Furthermore, we use the help of service providers for individual activities (e.g. IT support, hosting of our mail servers, etc.). These are obligated by means of corresponding agreements in accordance

with Art. 28 GDPR as order processors to strictly maintain confidentiality as well as to exclusively process data according to instructions.

### 15.3 Transfers to Third Countries

We do not intend to transfer your data to third countries outside the EU or the European Economic Area. Please note, however, that the operators of applicant portals where we place job advertisements may also process personal data in third countries. In this respect, please check the data protection notices of the relevant applicant portals.

## 16 Your Rights

You have the following rights with respect to us regarding personal data concerning you:

### 16.1 General Rights

You have the right to information, correction, deletion, restriction of processing, objection to processing and data portability under the respective legal conditions (Art. 15 et seq. GDPR). Insofar as processing is based on your consent, you have the right to revoke this consent with effect for the future (Art. 7 (3) GDPR).

To exercise your rights, please contact us by e-mail at [privacy@riskmethods.net](mailto:privacy@riskmethods.net) or by mail to riskmethods GmbH, Balanstraße 49, 81669 Munich. The exercise of your rights described under this point is free of charge for you.

### 16.2 Rights in Data Processing according to Legitimate Interest

Pursuant to Art. 21 (1) GDPR, you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data relating to you which is carried out on the basis of Art. 6 (1) (e) GDPR (data processing in the public interest) or on the basis of Art. 6 (1) (f) GDPR (data processing for the protection of a legitimate interest); this also applies to profiling based on this provision.

In the event of your objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

### 16.3 Revocation of Consent

According to Art. 7 (3) GDPR, you have the right to revoke your consent at any time. This has the consequence that we may no longer continue the data processing based on this consent for the future.

### 16.4 Right to Complain to a Supervisory Authority

Without prejudice to the rights referred to above and the possibility of seeking any other administrative or judicial remedy, you may at any time exercise your right to lodge a complaint with a supervisory authority, in particular in the Member State of your residence, place of work or place of the alleged infringement, if you consider that the processing of personal data relating to you infringes Data Protection Law (Article 77 GDPR).

The supervisory authority responsible for us is:  
Bayerisches Landesamt für Datenschutzaufsicht  
Promenade 27 (Schloss)  
D-91522 Ansbach  
Deutschland

## 17 Changes to the Data Protection Declaration

We reserve the right to change or adapt this Data Protection Declaration at any time in compliance with the applicable data protection regulations. The current version of this Data Protection



Declaration is available on our website at all times, or we will refer you to this Data Protection Declaration in the context of the relevant data processing.

If we introduce new data processing procedures that require your prior consent or in respect of which you have a right of objection, we will ask you for your consent prior to commencing data processing or inform you separately of the right of objection to which you are entitled.

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