

Data protection information Novum RGI Gemany GmbH

Information letter for applicants on the collection of personal data pursuant to Art. 12 et seq. DS-GVO

Dear applicants,

As a potential employer (controller), we would like to use this letter to inform you as an applicant (hereinafter referred to as "applicant") that we

**Novum RGI Germany GmbH
Nordostpark 51
90411 Nuremberg**

process your personal data (hereinafter referred to as "data") transmitted to us as part of your application in accordance with the provisions of the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG). You are the data subject (also referred to as the data subject) within the meaning of Art. 4 No. 1 GDPR.

The potential employer has the following information obligations towards the applicant:

1. information pursuant to Art. 13 para. 1 and Art. 14 para. 1 GDPR

The controller must provide the data subject with the following information pursuant to Art. 13 (1) and Art. 14 (1) GDPR at the time of data collection, unless the data subject already has this information:

a) Name and contact details of the controller and, if applicable, their representative

The potential employer and thus the management is responsible for compliance with data protection regulations. In our company this is:

Managing Director Mr. Kai-Uwe Reiter

b) Contact details of the external data protection officer and internal data protection coordinator

Our external data protection officer is

Herr Rechtsanwalt Thomas Costard
Rechtsanwaltskanzlei Costard
Kanzlei für IT-Recht und Datenschutz
EUROCOM Businesspark
Lina-Ammon-Straße 9
90471 Nürnberg
Telefon: +49 911 7903034
Telefax: +49 911 7903035
E-Mail: info@it-rechtsberater.de
Webseite: www.it-rechtsberater.de

Our internal data protection coordinator and first point of contact for data protection is

Thomas Reimann
Nordostpark 51
90411 Nuremberg
Telephone: + 49 911 239 90 470
E-Mail: Thomas.Reimann@novum-rgi.de

c) Purpose and legal basis of data processing

The processing (in particular collection, use, storage, transmission) of your applicant data is carried out exclusively for the purpose of filling a position in the applicant selection process (establishment of an employment relationship) in order to check your suitability for the position applied for and, if necessary, to invite you to an interview.

In addition to Art. 88 GDPR and Section 26 BDSG, the legal basis for processing may be in particular Art. 6 para. 1 subpara. 1 letter b GDPR (data processing for the implementation of pre-contractual measures), Art. 6 para. 1 subpara. 1 letter c GDPR (fulfillment of a legal obligation). c GDPR (fulfillment of a legal obligation).

A further legal basis may be the consent of the applicant within the meaning of Art. 6 para. 1 subpara. 1 letter a GDPR (e.g. inclusion in a so-called applicant pool)

d) Legitimate interests of the controller or a third party

If the processing is carried out on the basis of Art. 6 para. 1 subpara. 1 letter f GDPR to safeguard the legitimate interests of the controller or a third party, the applicant must be informed of this. A legitimate interest can be, for example, a legal, economic or idealistic interest, the legitimacy of which must be decided on a case-by-case basis as part of a weighing of the applicant's interests.

In the present case, the processing is not based on a legitimate interest.

e) Recipients or categories of recipients

In accordance with Art. 4 No. 9 GDPR, recipients of your data may be natural or legal persons, authorities or institutions.

Your applicant data will be forwarded to the internal departments responsible for the application process, to other branches of our company and to the service providers entrusted with the application process (online application tool). Data will only be passed on to other third parties if you have given us your prior written consent in accordance with Section 26 (2) BDSG. To conduct meetings within the application process (e.g. job interviews) via online tools (e.g. Microsoft Teams, Zoom, Skype), personal data that is processed in connection with participation may be passed on. In principle, this data is not passed on to third parties unless it is intended to be passed on. Please note that content from job interviews via online tools, as well as in face-to-face interviews, is used to carry out the application process and is therefore intended for internal disclosure.

In addition, when using online tools, the respective provider of the communication platform used and any subcontractors may gain knowledge of the data, insofar as this is necessary within the framework of our order processing relationship within the meaning of Art. 28 GDPR with the provider of the communication platform.

f) Data transfer to third countries or international organizations

Your applicant data will be processed exclusively within the European Union and stored on protected servers in Germany in compliance with data protection regulations. Data is not currently transferred to third countries or international organizations.

If, when processing your data, it is transferred to countries outside the European Union or the European Economic Area or service providers from countries outside the European Union or the European Economic Area (so-called third countries), we check whether there is an adequacy decision by the European Commission in accordance with Art. 45 para. 3 GDPR, or we conclude the necessary data protection contracts, in particular the agreement on order processing and the EU standard contract.

2. information pursuant to Art. 13 para. 2 and Art. 14 para. 2 GDPR

The controller must provide the data subject with the following information in accordance with Art. 13 (2) and Art. 14 (2) GDPR at the time of data collection, unless the data subject already has this information:

a) Sources of personal data

You have provided us with your applicant data yourself. In this case, it is important that this data is correct and that you help us to keep it up to date.

b) Duration of storage

We only store your data until the pre-contractual or contractual purpose has been fulfilled and there are no other statutory retention obligations (e.g. retention obligations under commercial or tax law).

If you have given us your consent (e.g. for inclusion in a so-called applicant pool), we will store your data until you withdraw your consent, unless there is another legal basis for processing your data.

c) Your rights as a data subject

You can request information about your data processed by us at any time in accordance with Art. 15 GDPR. In particular, you can request information about the purposes of the processing, the categories of data processed, categories of possible recipients and the planned storage period.

You are also entitled to request the rectification of inaccurate data in accordance with Art. 16 GDPR.

You can also request the erasure of the data in accordance with Art. 17 GDPR if

- the storage of the data is no longer necessary
- you have withdrawn your consent to data processing and there is no other legal basis for the processing
- you have objected to the processing and there are no overriding legitimate grounds for the further processing of your data
- your data has been processed unlawfully, or
- if there is a legal obligation to erase under EU or national law.

In addition, you have a right to restriction of processing in accordance with Art. 18 GDPR if

- you contest the accuracy of the data for a period enabling the controller to verify the accuracy of the data
- the processing is unlawful, but you oppose the erasure of the data
- the purpose of the processing has ceased, but the data is necessary for the assertion of your legal claims or if you have objected in accordance with Art. 21 GDPR and it is not yet clear whether the legitimate reasons of the controller outweigh your interests.

Furthermore, in accordance with Art. 20 GDPR, you have the right to receive the data concerning you in a commonly used, structured and machine-readable format (data portability). In addition, under certain conditions, you can request that your data be transmitted directly by a controller, insofar as this is technically possible.

You have the right to object to the use of your data for the above-mentioned purposes at any time (Art. 21 GDPR).

If you have given us your consent to process your data, you can revoke this at any time with effect for the future.

If you wish to withdraw your consent or assert the aforementioned data subject rights, please write to us at

**Thomas Reimann
Nordostpark 51
90411 Nürnberg
Telefon: + 49 911 239 90 470**

or send an e-mail to datenschutz@novum-rgi.de

d) Existence of the right to lodge a complaint with a supervisory authority

You can lodge a complaint with a supervisory authority in your country at any time (Art. 77 GDPR).

You can find a list of the supervisory authorities in Germany (for the non-public sector) and their addresses at

https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html

The following data protection supervisory authority is responsible for our company
Bavarian State Office for Data Protection Supervision

Promenade 18
91522 Ansbach
Ansbach, Germany
Telephone: +49 (0) 981 180093-0
Fax: +49 (0) 981 180093-800
E-mail: poststelle@lda.bayern.de

e) Provision of data

If the provision of data is required by law or contract or is necessary for the conclusion of a contract, the applicant must be informed of this. The provision of your data is necessary in order to be able to carry out the application procedure as a pre-contractual measure in accordance with Art. 6 para. 1 subpara. 1 letter b GDPR.

If you do not provide us with your data, it will not be possible for us to carry out the application procedure properly and to take further measures to establish an employment relationship.

f) Existence of automated decision-making, including profiling

There is no automated decision-making including profiling (pursuant to Art. 22 GDPR in conjunction with Art. 4 No. 4 GDPR).

3. information on an intended change of purpose of data processing in accordance with Art. 13 para. 3 and Art. 14 para. 4 GDPR

We will only process your applicant data for the purposes stated above.

In the event of a change in the purpose of data processing, we will inform you of this other purpose in good time before further processing.

If you have any further questions on the topics mentioned above, we will be happy to assist you at any time.