

D404en Privacy Policy softgarden frontends

The protection and confidentiality of your personal data is of particular importance for us. To ensure the protection of your personal data, we have taken technical and organizational measures to comply with the data protection regulations. This privacy policy informs you how we collect personal data as part of your application process and for what purpose the data is processed. Your data will be processed in accordance with this privacy policy and the applicable data protection laws.

This privacy policy applies to the career portal and the applicant management system of SpiraTec AG.

This privacy policy also applies to the following companies affiliated with SpiraTec AG:

- SpiraTec Solutions, Inc., 190 S. Orchard Ave, #B220 Vacaville, CA 95688, USA
- SpiraTec Italia S.r.l., Vía Francesco Giordani 56, 80122 Neapel, Italy
- onoff automation services GmbH, Albert-Einstein-Str. 12, 31515 Wunstorf, Germany
- SpiraTec France S.A.S., 17-21 Ruhe-Saint-Fiacre, 75002 Paris, France
- edeco ag, Langenhagstrasse 1, CH-4147 Aesch (BL), Switzerland

1. Data controller

The person responsible pursuant to Art. 4 No. 7 of the General Data Protection Regulation (hereinafter: "GDPR") is:

SpiraTec AG

An der Hofweide 7, 67346 Speyer, Germany

2. Data protection officer

Dr. Sebastian Heep

PLANIT/LEGAL Rechtsanwaltsgesellschaft mbH

Jungfernstieg 1, 20095 Hamburg, Germany

3. Processor

For the efficient implementation of application procedures, we use an applicant management system from softgarden e-Recruiting GmbH, Tauentzienstr.14, 10789 Berlin (contact: datenschutz@softgarden.de), which operates the applicant management as a processor within the meaning of Art. 4 No. 8 GDPR. A contract for commissioned processing in accordance with Art. 28 GDPR has been concluded with the provider, which ensures compliance with the provisions of data protection law.

We remain your first point of contact for exercising your data protection rights and for handling the application process. You can contact us directly or, if indicated, confidentially contact the data protection officer using the details of the data controller given above.

4. Object of data protection

The subject of data protection is the processing of personal data, in this case in the context of applicant management. Pursuant to Art. 4 No. 1 GDPR, this includes all information relating to an identified or identifiable natural person (hereinafter referred to as "data subject") that is required for the implementation of the application procedure and the initiation of an employment relationship, Art. 6 I b) GDPR or the applicable national law.

In addition, within the scope of the use of the applicant management, data related to the use, so-called usage data, is also collected. Usage data is data that is required to operate our websites, such as information on the start, end and scope of use of our website, including login data. This processing is in accordance with the provisions of data protection and telemedia law.

In the context of the application procedure and/or the use of the system, processing activities may also take place that are either based on legitimate interest pursuant to Art. 6 para. 1 lit. f) GDPR or on the basis of your consent pursuant to Art. 6 para. 1 lit. a) GDPR. Processing activities which are subject to a legal obligation to process or which are in the public interest, Art. 6 para. 1 lit. c) and e) GDPR, such as in the context of criminal prosecution or investigations by state authorities, also come into consideration. Through individual settings in your web browser, the configuration of the corresponding cookie settings and your user behaviour, you can determine and control the scope of the processing yourself.

5. Collection and use of your data

5.1. Visit of the website

For operational and maintenance purposes and in accordance with the provisions of telemedia law, interaction is recorded ("system logs"), which are necessary for the operation of the website or processed for system security purposes, for example to analyse attack patterns or unlawful usage behaviour ("evidence function").

Your internet browser automatically transmits the following data when you access the careers portal:

- Date and time of access,
- Browser type and version,
- Operating system used,
- Amount of data sent.
- IP address of the access

This data is not used for direct allocation within the scope of applicant management and is deleted again promptly in accordance with the legitimate retention periods, unless longer retention is required for legal or factual reasons, such as for evidence purposes. In individual cases, storage for the above-mentioned purposes may be considered. The legal basis is Art. 6 para. 1 lit. f) GDPR and tele media law.

softgarden uses the service of the ISO 27001 certified provider Cloudflare Inc, 101 Townsend St, San Francisco, USA or the subsidiary Cloudflare Germany GmbH, Rosental 7, c/o Mindspace, 80331 Munich Germany ("Cloudflare") to increase the security of the platform, in particular to protect against DDoS attacks, and to improve the speed of delivery. Cloudflare provides a network of servers capable of delivering optimised content to the end user and intercepting virus-laden traffic.

The services provided by Cloudflare include the product "Data Localisation Suite" with the components "Regional Services" and "Metadata Boundary for Customers". Both components ensure that the transfer of personal data when using our platform takes place exclusively within the EU.

The "Regional Services" ensure that the customer content traffic, in this case the end customer traffic, is securely transmitted to Cloudflare PoPs within the region selected by softgarden and is checked within a Point of Presence (PoP) in this defined region.

softgarden has chosen Germany as the selected region, so all traffic is checked exclusively on servers in Germany. Metadata Boundary ensures that Cloudflare does not transmit any customer logs originating from the services used outside the European Union.

The personal data processed by Cloudflare includes all content transmitted by customers and applicants, i.e. beyond the IP address, all files (application documents) and multimedia images, graphics, audio or video, as well as any interaction of their browser with the softgarden system.

Cloudflare is the recipient of your personal data and acts as a processor for softgarden. This corresponds to the legitimate interest within the meaning of Art. 6 para. 1 sentence 1 lit. f GDPR to ensure security and security as well as user-friendliness on the platform.

Your personal data will be stored by Cloudflare for as long as is necessary for the purposes described, usually 124 calendar days.

Further information about Cloudflare can be found at [Cloudflare DPA](#).

5.2. Session-Cookies

We store so-called "cookies" in order to offer you a comprehensive range of functions and to make the use of our websites more convenient. "Cookies" are small files that are stored on your computer with the help of your internet browser. If you do not wish to use "cookies", you can prevent the storage of "cookies" on your computer by adjusting the settings of your internet browser. Please note that the functionality and functionality of our offer may be limited as a result.

We use the cookie JSESSIONID on the career page as a technically necessary session cookie. This saves a so-called session ID, with which various requests of your browser can be assigned to the common session. This allows your computer to be recognized when you return to our website. This session cookie is deleted when you log out or close the browser.

Optional cookies based on consent are only set after confirmation in the cookie banner. You can edit your cookie settings by clicking here. Alternatively, you can deactivate all non-functional cookies here: <COOKIE BANNER LINK>

5.3. Data entered by the user

5.3.1. Application process

As part of the application process, you can set up and manage an account in the career portal after configuring a username and password. You can use further options in the softgarden applicant management system beyond the individual application and make your individual settings (e.g. inclusion in a talent pool).

For an efficient and promising application, you can provide the following information as part of your application to us:

- Contact details (address, telephone number)

- Curriculum vitae data e.g. school education, vocational training, work experience, language skills
- Profiles in social networks (e.g. XING, LinkedIn, Facebook)
- Documents in connection with applications (application photos, cover letter, references, work samples, etc.)

The legal basis for processing for the purpose of carrying out the application procedure and initiating an employment relationship is Art. 6 I b) GDPR or the applicable national law. In addition, the use of the applicant management system by the data controller is in the legitimate interest pursuant to Art. 6 para. 1 lit. f) GDPR. If consent within the meaning of Art. 6 para. 1 lit. a) is required for a specific processing activity, this will be obtained separately and transparently from you by the data controller, unless it results from conclusive and voluntary behaviour on your part in accordance with the transparency requirement, such as voluntary participation in a video interview.

5.3.2. Transfer of personal data

Your data will not be disclosed to unauthorised third parties within the scope of the applicant management and will be processed for the purposes stated in this data protection declaration. Thus, the inspection by internal departments and specialist managers of the person responsible is in the legitimate interest, insofar as knowledge of the details from the application procedure is necessary and permissible for the selection of applicants or internal administrative purposes of the company. For this purpose, your details may be forwarded to third parties within the company by e-mail or within the management system. The legal basis may be Art. 6 I b) GDPR or the applicable national law, Art. 6 para. 1 lit. f) as well as a) GDPR.

The transfer to third parties also takes place within the framework of commissioned processing pursuant to Art. 28 GDPR, i.e. within the framework of processing activities in which the controller has a legitimate interest in outsourcing processing activities that it is otherwise entitled to carry out itself. For this purpose, the controller shall take the measures to ensure compliance with the data protection provisions.

A transfer to external third parties may also take place for the defence of legal claims on the basis of legitimate interest or in the context of the investigation of or disclosure to state authorities, insofar as a law requires this or there is an obligation to disclose. The information obligations vis-à-vis data subjects within the meaning of Articles 13 and 14 of the GDPR are ensured in advance of the transfer in question, insofar as these are to be fulfilled separately.

5.3.3. CV-Parsing with Textkernel

We process and analyze documents uploaded by you using AI in order to extract CV data and convert them into a structured form (so-called "CV-Parsing").

In order to ensure affected parties' rights and security standards, a contract for order processing has been concluded with the providing service provider. Processor is the ISO27001-certified provider Textkernel B.V. Nieuwendammerkade 26 A 5, (1022AB) Amsterdam, The Netherlands. The data processing takes place on a server in Germany in a secure environment.

The legal basis for processing is Art. 6 I b) GDPR (or applicable national law) and Article 6 (1) lit. f) GDPR in order to initiate an employment relationship and to make the application process efficient for you. Personal data will not be transferred to unsafe third countries. Your data is routinely deleted from the cache once a week.

5.3.4. Job subscription "Job-Abo"

In order to be informed about new job vacancies, you can subscribe to the job newsletter or have suitable jobs displayed on our career board (RSS feed). You can define the subscription by specifying the desired activity and the location.

Your e-mail address is also required for the subscription. The legal basis for this is your consent to the receipt of the newsletter in accordance with Art. 6 (1) lit. a GDPR. You can revoke your consent to receive the newsletter at any time via the unsubscribe link in the newsletter (Opt-Out).

The RSS feed itself does not process any personal data for information on new job advertisements.

5.3.5. Feedback module

In addition to your application, we may ask you to submit your feedback after an interview and 3 months after you have been hired. We will send you an invitation link that will take you to the rating system to submit your feedback. The purpose of the processing is to further develop and optimise our recruiting and application processes as well as the company image.

The following data is processed automatically for this purpose

- Contact details (name, e-mail)
- Position title of the job for which you have applied
- Location of the position
- Job category
- Applicant identifier

The feedback itself is anonymised and stored in the database. No personal reference is made. In addition to a star rating for individual questions, you have the opportunity to leave comments here. We expressly ask you not to leave any personal data in the comments. The information collected in this way can be displayed together with your feedback on our review page or transmitted to external partners such as kununu.

Participation is purely voluntary and only takes place with your consent, without which the submission of feedback is not possible. The legal basis is Art. 6 para. 1 lit. a) GDPR.

5.3.6. Salary Statistics

softgarden will give you the opportunity to provide feedback on your salary expectations and salaries offered to you in various steps of the application process.

The information transmitted will be anonymised and processed without linking to your name and contact details. softgarden processes this data anonymously for its own purposes (statistics, analysis, studies) and is responsible for this processing in the form of Art. 4 No. 7 GDPR.

The processing takes place only with your consent by participation and on a purely voluntary basis. The legal basis is Art. 6 (1) lit. a) GDPR.

5.3.7. Social Share Buttons

It is possible to share the job ads on different social networks. Different buttons are offered per network. After clicking on one of these buttons, you will be directed to the respective networks and

will be taken to their login pages. These buttons do not represent plug-ins and do not transmit personal data directly to the operators of the social networks.

Currently, job ads can be shared on the following social networks:

- Facebook (<https://de-de.facebook.com/privacy/explanation>)
- X (<https://x.com/en/privacy>)
- LinkedIn (<https://www.linkedin.com/legal/privacy-policy?trk=uno-reg-join-privacy-policy>)
- Xing (<https://privacy.xing.com/de/datenschutzerklaerung>)

The legal basis is Article 6 (1) lit. f) GDPR for statistical analysis and range measurement of job advertisements.

You can also find out how the aforementioned social networks process your personal data by using the links provided. We have no influence on the processing of your personal data by the social networks.

5.3.8. Online Surveys "easyfeedback"

At the end of the application process, softgarden can send you an invitation to a survey via a link. The survey takes place via a service of easyfeedback GmbH in order to check the application experience. softgarden conducts this survey as controller, Article 4 No. 7 GDPR and processes the collected data anonymously for its own purposes (statistics, analysis, studies) as well as for the further development of softgarden products.

The collection of the survey data is secured by default via the SSL encryption method and softgarden does not establish a personal reference within the scope of processing. The survey can be cancelled at any time. The data processed up to the time of termination can be used for these purposes.

Your participation in the survey is purely voluntary and you agree to participate, without which your participation is not possible, Art. 6 (1) lit. a) GDPR. The processing of the data is carried out anonymously. Anonymised data is not subsequently subject to the substantive scope of the GDPR.

Further information on the data protection of easyfeedback can be found in the following notes: <https://easy-feedback.de/privacy/datenschutzerklaerung>.

5.3.9. Talentpool

As part of your application or via the "Stay in touch" button, you have the opportunity to recommend yourself for our talent pool. Processing is necessary in order to be automatically considered for further vacancies, i.e. for similar or otherwise suitable positions.

When you register for the talent pool using the Get In Contact button, the following information is queried:

- Salutation, academic title (optional)
- First, last name, e-mail address
- Job fields in interest
- Current career level
- Preferred location(s)

- XING profile or CV

The inclusion in the talent pool takes place on a purely voluntary basis with your consent as well as by using an opt-in link. The legal basis is Art. 6 (1) lit. f) GDPR. Furthermore, we will contact you after 6 months to confirm, if you still want to be part of the talent pool.

5.3.10. Scheduling "Cronofy"

We use an integrated service of Cronofy Limited, 9a Beck Street, Nottingham, NG1 1EQ, UK for scheduling and invitation.

If we invite you to a conversation via this function, you will receive an appointment invitation created via Cronofy via e-mail. This will send your e-mail address as well as the title of the appointment, a description and a location where the appointment will take place. In addition, no other personal data will be transferred from you to Cronofy.

The legal basis for processing is Art. 6 (1) lit. f GDPR in order to integrate scheduling into our applicant management system as well as to plan and manage job interviews and other appointments more efficiently.

Data processing takes place encrypted in an isolated environment on a server in Germany. Adequate security standards for data processing have been agreed with the provider and proven by the provider. Further information can also be found at the following link: [Scheduling Platform for Business | Cronofy the scheduling experts.](#)

If you do not wish to receive any data processing by Cronofy or any further information, please provide this in advance of the appointment coordination.

5.3.11. Transfer of application status

If you apply to us via a job board (e.g. Hellowork, Stepstone), the data you submit will be automatically transferred to our recruiting system.

With some of these job boards, you have the option of tracking the status of your application in your account with the respective job board. For this purpose, our service provider, softgarden e-recruiting GmbH, transmits the status of your application (receipt, processing of the application, rejection) to the job exchange on our behalf. The transmission of the status in your account with the job exchange takes place with a time delay (up to four weeks) so that we can inform you personally about the status of your application in advance.

The legal basis for data transmission is Art. 6 para. 1 lit. b GDPR (initiation of an employment relationship).

Further information on data processing can be found in the data protection information of the respective job exchange you have applied through.

5.3.12. Recruiting by text message

We offer you the option of submitting your application via certain messenger services. This is designed to make it quick and easy for you to apply. If you use this option and apply to us via one of the available messenger services, the application data you enter and any other messages you send during the chat will be processed by the respective messenger service provider.

For details on data processing by the messaging services, please refer to the respective privacy policies of the providers: WhatsApp, Telegram, Facebook Messenger. Please note that we have no influence over the data processing carried out by the messaging services themselves.

The messaging services are technically connected to our recruitment system via specialised messaging service providers.

Applications submitted via Telegram or Facebook Messenger are connected to our recruitment system via the MessengerPeople service provided by MessengerPeople GmbH, St.-Martin-Straße 63, 81669 Munich. MessengerPeople forwards your messages directly to our recruitment system and may thereby gain access to the data you have entered during the application process. In order to provide the service, MessengerPeople processes the personal data you have stored with the relevant messaging service, in particular your first name and surname, your device, your profile picture and the messages exchanged. MessengerPeople acts strictly in accordance with our specifications and is contractually obliged to process your personal data in accordance with the GDPR.

Applications submitted via WhatsApp are currently connected to our recruitment system via messaging service providers. During a technical transition phase until the end of May 2026, the connection may be established either via MessengerPeople GmbH or via 360dialog GmbH. Both providers forward the messages you send via WhatsApp directly to our recruitment system to facilitate the application process. From 1 June 2026, the processing of data relating to applications submitted via WhatsApp will be carried out exclusively by 360dialog GmbH.

360dialog does not store message content or media files. For operational purposes, only technical message logs (such as message ID, sender, recipient and delivery status) may be processed.

The legal basis for data processing is Article 6(1)(b) of the GDPR. We process the data you provide solely for the purpose of establishing an employment relationship. If you wish to apply via Messenger, you must provide the data required for this purpose. If you do not wish your data to be transferred to the service providers mentioned above, please use our alternative application options.

As part of data processing, your personal data may be transferred to locations outside the EU. Such transfers will only take place to the extent permitted by law. If the European Commission has not adopted an adequacy decision for a third country, we use the EU Standard Contractual Clauses as appropriate safeguards for the transfer of personal data to third countries.

You can cancel the application process at any time by entering the command /cancel in the chat window. In this case, all data entered up to that point will be deleted.

If you have applied via WhatsApp, you can also request the deletion of your Messenger application data via the data deletion link provided during the application process. Once the request has been submitted, the application data associated with your telephone number will be deleted from our systems.

Once your application has been finalised and successfully transferred to our recruitment system, your interview data will be deleted from MessengerPeople after 180 days, where applicable. The general deletion rules apply to your application received in our recruitment system (see Section 6).

6. Retention and storage of personal data

Your data will be stored for the duration of the application process and in accordance with legitimate retention periods after completion of the application process. In case of a cancellation, the data will be kept for 3 months. After recruitment, the data will be kept for another 3 months. After the retention period has expired, the data is completely anonymized. The processing of anonymized data records is not subject to the material scope of data protection regulations, so that anonymized data may be

processed for statistical and analytical purposes, for the preparation of market studies or for product development.

7. Your rights as a data subject

7.1. Rights of data subjects

Data subjects are entitled at any time to know whether their personal data have been stored and can assert a right of access to stored data (right of access), check their accuracy (right to rectification), request their addition and updating, request their deletion (right to be forgotten), request the restriction of processing (right to restriction) as well as have the data ported/portable in a common, machine-readable format (data portability). These rights shall apply insofar as there are no compelling and/or justified reasons on the part of the controller. Please contact datenschutz@spiratec.com or by post at the address above.

In cases where we process data on the basis of your consent (Art. 6 sec. 1 lit. a) GDPR), you have the right at any time to revoke your consent without giving reasons and with effect for the future. The corresponding data processing will no longer take place in the future, but does not affect the legality of the processing carried out up to the time of revocation. In addition, you have the right to object to processing, for example if the data are or have been processed incorrectly, or if other reasons in the interest of the data subject preclude (further) processing. Affected parties also have the right to complain to the data controller.

Please note that in the event of an objection and/or revocation, certain services/processing activities cannot be performed or can be used, insofar as the processing is necessary for these purposes.

7.2. Automated decision-making

Automated decision-making does not take place. Should this be or become necessary, we will obtain a transparent consent in advance of processing.

8. Changes to this Privacy Policy

We reserve the right to change or supplement this data protection declaration at any time with regard to the constantly changing legal, technical and organisational requirements of the processing of personal data. This also applies to possible translation errors and differences with regard to national requirements of data protection law.

Version

Document ID: D404en

Valid from: 10.03.2026

Rev. 3.8