

Privacy Policy Career Page

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

This privacy policy applies to the career portal and the applicant management system of FGS Global (Europe) GmbH.

1 Name and contact details of the controller

Controller pursuant to Art. 4 No. 7 of the General Data Protection Regulation (hereinafter: "GDPR") is FGS Global (Europe) GmbH, Speditionsstraße 2, 40221 Düsseldorf, privacy@fgsglobal.com

2 Data protection officer

If you have any questions about data protection, please contact FGS Global (Europe) GmbH, Speditionsstraße 2, 40221 Düsseldorf, privacy@fgsglobal.com.

3 Order processing

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 system as a processor within the meaning of Art. 4 No. 8 GDPR. A contract for order processing in accordance with Art. 28 GDPR, which ensures compliance with data protection regulations.

We remain your first point of contact for exercising your rights as a data subject and for handling the application process

, we remain your first point of contact. You can contact us directly using the details provided above of the controller or, if specified, confidentially to the data protection officer.

4 Subject matter of data protection

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

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

As part of the application process and/or the use of the system, processing activities may also take place that are either based on legitimate interest pursuant to Art. 6 (1) (f) GDPR or on the basis of your consent pursuant to Art. 6 (1) (a) GDPR.

Processing activities that are subject to a legal obligation to process or a public interest, Art. 6 (1) lit.

c) and e) GDPR, such as in the context of criminal prosecution or investigation by state authorities. You can change the scope of the corresponding cookie settings, and your user behavior, you can determine and control the scope of processing yourself and control it.

5 Collection and use of your data

5.1 Visiting the website

We process server log data to ensure availability and security (Art. 6 (1) f) GDPR). Data is generally stored for 14 days and only extended for evidentiary purposes if necessary. The use of necessary technical means on your end device is based on § 25 (2) No. 2 TDDDG (technically necessary).

When you access the career portal, your internet browser automatically transmits the following data:

- date and time of access,
- browser type and version,
- operating system used,

- amount of data sent.
- IP address of access

This data is not used for direct assignment within the framework of applicant management and will be deleted in a timely manner in accordance with the legitimate retention periods in a timely manner, provided that no longer storage is required for legal or factual reasons, such as for evidence, no longer storage is required. In individual cases, retention for the purposes mentioned may be considered.

softgarden uses the services of the ISO 27001-certified provider Cloudflare Inc., 101 Townsend St, San Francisco, USA, or its 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 delivery speed. Cloudflare offers a network of servers that is capable of delivering optimized content to end users and intercepting virus-infected traffic.

The services provided by Cloudflare include the "Data Localisation Suite" product 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.

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

softgarden has selected Germany as its region, which means that all traffic is checked exclusively on servers in Germany. Metadata Boundary ensures that Cloudflare does not transfer 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 (1) (1) lit. f GDPR, to ensure security, hazard prevention, and user-friendliness on the platform.

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

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

5.2 Reading and storing information on the end device

Technically necessary cookies (in particular "JSESSIONID" and "br", both session cookies, duration: until the end of the session) are set on the basis of Section 25 (2) No. 2 TDDDG and Art. 6 (1) b and f GDPR, in particular to maintain your started session, save selected filters for job advertisements, remember your language selection, and temporarily store your entries and started applications. In addition, Cookiebot from Usercentrics A/S, Havnegade 39, 1058 Copenhagen, Denmark, is loaded, which ensures the proper reading and storage of information on the end device. Non-essential cookies are not used. Only a data protection-friendly and minimal measurement in the form of a call counter is used to count how often a particular job posting has been clicked on; however, this does not occur in the application forms.

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 on the career portal after configuring a username

and password, you can set up and manage an account in the career portal. In addition to the individual application, you can use additional options in the softgarden applicant management system and configure your individual settings (e.g., inclusion in a talent pool).

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

- Contact details (address, telephone number)
- Curriculum vitae data, e.g.
 - o School education
 - o Vocational training
 - o Professional experience
 - o Language skills
- Profiles on social networks (e.g., XING, LinkedIn, Facebook)
- Documents related to job applications (application photos, cover letters, certificates, references, work samples, etc.)

The legal basis for the processing of your application data is Section 26 (1) BDSG (establishment of an employment relationship). Where necessary, this is supplemented by Article 6 (1) b GDPR. Processing on the basis of legitimate interests (Art. 6 (1) f GDPR) only takes place to the extent necessary for system security, internal administration of the application process, or legal defense; our legitimate interest lies in these purposes. , the use of the applicant management system by the controller is based on legitimate interest pursuant to Art. 6 (1) (f) GDPR. If consent within the meaning of Art. 6 (1) (a) is required for a specific processing activity requires consent within the meaning of Art. 6 (1) (a), this separately and transparently by the controller, provided that it is not not follows from your conclusive and voluntary behavior in accordance with the transparency requirement , such as voluntary participation in a video interview.

5.3.2 Disclosure of data

Your personal data will be processed in applicant management exclusively for the purposes specified in this privacy policy and will not be disclosed to unauthorized third parties.

Internal recipients. Only the relevant departments and specialists responsible of the controller, insofar as this is necessary for applicant selection or internal administration (Art. 6 (1) (b), (f) GDPR; Section 26 (1) BDSG; with consent Art. 6 (1) (a) GDPR). For this purpose, information may be forwarded internally by email or via the applicant/management system.

Affiliates (EU/EEA). If necessary for the application process or group-wide administration, data will be transferred to affiliated companies (subsidiaries/branches) within the EU/EEA for the same purposes on the above legal bases. Depending on the structure, there are contracts for order processing (Art. 28 GDPR) or agreements on joint responsibility (Art. 26 GDPR).

Order processing. We engage service providers (e.g., providers of applicant management/IT services) in accordance with Art. 28 GDPR and oblige them to comply with appropriate technical and organizational measures (Art. 32 GDPR).

Legal claims/authorities. Data may be transferred for the purpose of asserting, exercise or defense of legal claims (Art. 6 (1) (f) GDPR; Section 26 4(1) BDSG) or in the case of a legal obligation to authorities (Art. 6 (1) (c) GDPR).

Third countries (including the USA). Data will only be transferred to countries outside the EU/EEA if

- an adequacy decision by the EU Commission has been issued (Art. 45 GDPR; e.g., EU US Data Privacy Framework), or
 - appropriate safeguards are in place (Art. 46 GDPR), in particular EU standard contractual clauses (Art. 46 (2) (c)/(d) GDPR), with additional protective measures.
- In exceptional cases, Art. 49(1) GDPR may apply (e.g. express consent).

5.3.3 CV analysis with Textkernel

We process and analyze documents uploaded by you using AI technology to extract CV data and convert it into a structured form (known as "CV parsing").

To ensure the rights of data subjects and security standards, a contract for order processing has been concluded with the processing service provider.

The processor is the ISO27001-certified provider Textkernel B.V. Nieuwendammerkade 26 A 5, (1022AB) Amsterdam, Netherlands.

Data processing takes place on a server in Germany in a secure environment.

The legal basis for processing is Art. 6 I b) GDPR and Art. 6 (1) sentence 1 lit. f) GDPR, in order to initiate an employment relationship and to facilitate the application process. as efficiently as possible. Personal data will not be transferred to unsafe third countries. third countries. After processing, your data will be deleted from temporary storage at Textkernel.

5.3.4 Feedback module

In addition to your application, we may ask you to provide feedback after an interview and 3 months after your hiring. We will send you an

invitation link that will take you to the rating system for submitting your feedback. The purpose of processing is to further develop and optimize our recruiting and application processes and the company's image.

The following data will be processed automatically for this purpose:

- Contact details (name, email)
- Position title of the job you applied for
- Location of the position
- Job category
- Applicant ID

The feedback itself is stored anonymously in the database. No personal reference is made. In addition to a star rating for individual questions, you also have the option to leave comments. We expressly ask you not to include personal data in your comments. The information collected in this way may be displayed on our rating page together with your feedback or shared with external partners such as kununu.

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

5.3.5 Subscription to job advertisements "Job subscription"

For the job subscription, we use the double opt-in procedure and log consents (time, IP/hash) for verification purposes. The legal basis is Art. 6 (1) a GDPR. You can unsubscribe at any time using the link contained in each email. We delete the email address no later than 24 months after the last activity or immediately after revocation.

5.3.6 Online surveys "Easyfeedback"

At the end of the application process, Softgarden may send you an invitation to a survey via a link. The survey is conducted via a service provided by easyfeedback GmbH to ask about the application experience. Softgarden conducts this survey to improve the application experience. Easyfeedback GmbH asks about your application experience. Softgarden conducts this survey as the controller within the meaning of Art. 4 No. 7 GDPR and processes the data collected anonymously for its own purposes (statistics, analysis, studies) and for the further development of softgarden products.

The collection of survey data is secured by default using SSL encryption and softgarden does not establish any personal references during the evaluation. The survey can be discontinued at any time. The data processed up to the point of discontinuation can be used for the purposes mentioned above.

Your participation in the survey is purely voluntary and by participating you declare your consent, without which your participation is not possible, Art. 6 (1) (a) GDPR. The data processing for evaluation purposes is carried out anonymously by softgarden.

For more information on easyfeedback's data protection policy, please refer to the following notes <https://easy-feedback.de/privacy/datenschutzzerklaerung>.

5.3.7 Talent pool

As part of your application or via the "Get in touch" button, you have the option to recommend yourself for our talent pool. Processing is necessary in order to be considered automatically for other job vacancies, including similar or otherwise suitable positions. Inclusion in the talent pool is voluntary and based on your consent (Art. 6 (1) (a) GDPR). We store your data for 12 months; before expiry, we ask for an extension (opt-in reminder). In the event of revocation or failure to extend, we delete the data immediately.

If you register for the talent pool via the "Get in touch" button, the following information will be requested:

- Title, academic title (optional)
- First name, last name, email address
- Job fields of interest
- Current career stage
- Preferred location(s)
- XING profile or resume

Inclusion in the talent pool is entirely voluntary and requires your consent and by using an opt-in link. The legal basis is Art. 6 (1) (a) GDPR.

5.3.8 Disclosure of application status information

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. Some of these job boards allow you to track the status of your application in your account on the respective job board. To do this, our service provider, softgarden e-recruiting GmbH, will transmit the status of your application (receipt, processing of the application, rejection) to the job board on our behalf. The status notification in your account on the job board is delayed.

time delay (up to four weeks) so that we can inform you personally about the status of the application.

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

Further information on data processing can be found in the privacy policy of the respective job board through which you applied.

5.3.9 Recruiting via text message

The use of messengers is voluntary; alternatively, you can apply at any time by email/portal. Depending on the provider, processing may take place in third countries (including the USA). This is based on the terms and conditions of the respective provider and EU standard contractual clauses; details can be found in the provider's privacy policy. Messages are deleted by MessengerPeople after 180 days; the application data transferred to our system is subject to the general deletion rules.

For details on data processing by messenger services, please refer to the respective privacy policies: WhatsApp, Telegram, Facebook Messenger. Please note that we have no influence on data processing by the messenger services.

The messenger services are connected to our recruiting system via the MessengerPeople service of

MessengerPeople GmbH, St.-Martin-Straße 63, 81669 Munich.

MessengerPeople forwards your messages directly to our recruiting system and thereby obtains access to the data you entered during the application process. MessengerPeople processes the personal data you have stored with the respective messenger service

, in particular your first and last name, device,

profile picture, and the messages exchanged via MessengerPeople. MessengerPeople

acts in accordance with instructions and is bound by a contract for order processing to

to process your personal data in accordance with the GDPR.

The legal basis for data processing is Art. 6 (1) (b) GDPR. We process the data you enter solely for the purpose of initiating an employment relationship with you. If you decide to apply via short message , the provision of data is necessary for this purpose. If you do not agree to do not agree to your data being forwarded to the recipients mentioned here, we ask you to use our alternative application options.

As part of data processing, your personal data may be transferred to entities based outside the EU. Such transfers are carried out in a permissible manner

if the European Commission has determined that an adequate level of data protection is provided in such a third country.

adequate level of data protection. Unless an adequacy decision

and unless otherwise specified below, we use the following for the transfer

personal data from the scope of the GDPR to third countries as appropriate guarantees.

You can cancel the application at any time by using the /cancel command in the chat window.

In this case, all data entered so far will be deleted. If your application

has been completed and successfully transferred to our recruiting system, your

interview data entered will be deleted from MessengerPeople after 180 days. For your

our recruiting system, the general deletion rules apply

(see section 6).

6 Deletion and use of 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 the event of rejection, we regularly delete application data after 6 months (Art. 17 GDPR in conjunction with § 15 AGG).

If you are hired, we will transfer relevant documents to your personnel file; further processing is based on the employment relationship (Section 26 BDSG) and statutory retention periods.

The period specified in section 5.3.9 applies to talent pool data. Server logs: [7–14] days; Cloudflare: 124 days; analytics event data: [2–14] months (depending on configuration).

7 Your rights as a data subject

7.1 Rights of data subjects

Data subjects are entitled at any time to find out whether their personal data

has been stored and may assert a right to information about stored data

(right to information), check its accuracy (right to correction), request its supplementation and

update, request its deletion (right to be forgotten), request the

restriction of processing (right to restriction), and to have the data ported/porting in

a commonly used, machine-readable format

(data portability). These rights apply unless there are compelling and/or legitimate

reasons on the part of the controller. To do so, please contact us or

by mail to the address given above.

In cases where we process data on the basis of your consent (Art. 6 (1) (a) GDPR), you have the right to withdraw your consent at any time without giving reasons and with effect for the future. The corresponding data processing will then no longer take place in the future, but will not affect the lawfulness of the processing that took place up to the time of revocation. In addition, you have the right to object to processing, for example if the data is being processed incorrectly or if there are other reasons in the interest of the data subject that prevent (further) processing. Data subjects also have the right to lodge a complaint with the supervisory authority responsible for data processing. Please note that in the event of an objection and/or revocation, certain services/processing activities cannot be performed or used to the extent that processing is necessary for these purposes.

7.2 Automated decision-making

Automated decision-making, including profiling, does not take place. Should this be or become necessary, we will obtain transparent consent in advance of the processing at the appropriate point.

7.3 Application process

The provision of basic application data (contact details, qualifications, documents) is necessary for the review of your application. Without this data, participation in the application process is not possible.

8 Changes to this privacy policy

We reserve the right to change this privacy policy at any time in light of the continuously changing legal, technical, and organizational requirements for the processing of personal data. This also applies to any translation errors and differences with regard to national requirements of data protection law.

9.0 Version

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