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## 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 informs you about how we collect personal data during the 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 regulations.

This privacy policy applies to the career portal and the applicant management system of Witten/Herdecke University.

## Name and contact details of the controller

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

Witten/Herdecke University

Private University Witten/Herdecke gGmbH

Alfred-Herrhausen-Straße 50

58448 Witten

Phone: 02302 / 926- 0

Fax: 02302 / 926 - 407

## Data Protection Officer

Martin Rützler

Private University Witten/Herdecke gGmbH

Alfred-Herrhausen-Straße 50

58448 Witten

[datenschutz@uni-wh.de](mailto:datenschutz@uni-wh.de)

## Order processing

To ensure the efficient implementation of application procedures, we use an applicant management system provided by softgarden e-Recruiting LLC, Tauentzienstr. 14, 10789 Berlin (contact: [datenschutz@softgarden.de](mailto:datenschutz@softgarden.de)), which operates the applicant management system as a processor within the meaning of Art. 4 No. 8 GDPR. To ensure compliance with data protection regulations, we have made an agreement regarding order processing in accordance with Art. 28 GDPR with the provider.

We remain your first point of contact for exercising your rights as a data subject and for handling the application process. You can contact us directly using the details of the controller provided above or contact the data protection officer confidentially.

## Subject matter of data protection

The subject matter of data protection is the processing of personal data, in this case within the framework 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 “data subject”) that is necessary 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 related to its use, known as usage data, is also collected. 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 the provisions for data protection and digital services.

As part of the application process and/or use of the system, processing activities may also take place that are based either on legitimate interest pursuant to Art. 6 (1) (f) GDPR or on 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) (c) and (e) GDPR, such as in the context of criminal prosecution or investigation by government agencies, may also be considered. You can determine and control the scope of processing yourself through individual settings in your web browser, the configuration of the corresponding cookie settings, and your usage behavior.

## Collection and use of your data

### Visiting the website

For operational and maintenance purposes, and in accordance with telemedia law provisions, interactions are recorded (“system logs”) that are necessary for the operation of the website or processed for system security purposes, for example to analyse attack patterns or illegal usage behavior (“evidence function”).

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 scope of applicant management and is deleted promptly in accordance with the legitimate retention periods, unless longer retention is necessary for legal or factual reasons, such as for evidence purposes. In individual cases, storage for the aforementioned purposes may be considered. The legal basis is Art. 6 (1) (f) GDPR and telemedia law.

Softgarden uses the services of the ISO 27001-certified provider Cloudflare Inc. 101 Townsend St, San Francisco, USA, or its subsidiary Cloudflare Germany LLC, 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 Localization 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 checked within a Point of Presence (PoP) in this defined region.

Softgarden has chosen Germany as its selected region, so all data 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., in addition to the IP address, all files (application documents) and multimedia images, graphics, audio, or video, as well as any interaction between your browser and 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) (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 necessary for the purposes described, usually 124 calendar days.

Further information about Cloudflare can be found at: <https://www.cloudflare.com/de-de/cloudflare-customer-dpa/>

## **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 want cookies to be used, you can prevent cookies from being stored on your computer by adjusting the settings of your Internet browser accordingly. Please note that this may limit the functionality and range of functions of our website.

We use the JSESSIONID cookie on our career page as a technically necessary session cookie. This stores a so-called session ID, which can be used to assign various requests from your browser to the shared 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 your browser.

## Data entered by the user

### Application process

As part of the application process, you can set up and manage an account on the career portal after configuring your login name and password. In addition to individual applications, you can use other options in the softgarden applicant management system and configure your individual settings (e. g., inclusion in a talent pool).

To ensure an efficient and successful application, you can provide us with the following information as part of your application:

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

The legal basis for processing for the purposes of conducting the application process and initiating an employment relationship is Art. 6 1 b) GDPR. In addition, the use of the applicant management system by the controller is in the legitimate interest pursuant to Art. 6 (1) lit. f) GDPR. If consent within the meaning of Art. 6 (1) (a) is required for a specific processing activity, this will be obtained separately and transparently by the controller, unless it can be inferred from your conclusive and voluntary behavior, such as voluntary participation in a video interview, in accordance with the transparency requirement.

### Transfer of data

Your data will not be transferred to unauthorised third parties within the scope of applicant management and will be processed for the purposes specified in this privacy policy. Access by internal departments and specialists responsible for data processing is in the legitimate interest of the controller, to the extent that knowledge of the information from the application process is necessary and permissible for the selection of applicants or for internal administrative purposes of the company. For this purpose, your information may be forwarded to third parties within the company by e-mail or within the management system. The legal basis for this may be Art. 6 (1) (f) and (a) GDPR.

The transfer to third parties also takes place within the framework of order processing in accordance with 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 would otherwise be entitled to carry out itself. For this purpose, the controller shall take measures to ensure compliance with data protection regulations.

Data may also be disclosed to external third parties for the defense of legal claims based on legitimate interest or in the context of investigations by or disclosure to government agencies, insofar as this is required by law or there is an obligation to disclose. The information

obligations towards data subjects within the meaning of Articles 13 and 14 GDPR shall be observed in advance of the transfer in question, to the extent that these are to be fulfilled separately.

## **Job subscription**

To be informed about new job vacancies, you can subscribe to the job newsletter or view suitable positions at our company on the career board (RSS feed). You can refine your subscription by specifying your desired job and location.

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

No personal data is processed via the RSS feed itself for the purpose of providing information about new job advertisements.

## **Social Share Buttons**

It is possible to share job advertisements on various social networks. Different buttons are provided for each network. After clicking on one of these buttons, you will be redirected to the respective networks and taken to their login pages.

These buttons are not plug-ins and do not transfer any 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>)

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 Art. 6 (1) (f) GDPR for statistical analysis and reach measurement of job advertisements.

Under the links provided, you can also find out how the aforementioned social networks process your personal data. We do not control nor may we influence the processing of your personal data by social networks.

## **Online-Surveys “Easyfeedback”**

At the end of the application process, softgarden may display a link inviting you to participate in a survey. The survey is conducted via a service provided by easyfeedback LLC to gather feedback on the application experience. Softgarden conducts this survey as the controller within the meaning of Art. 4 No. 7 GDPR and processes the collected data 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 cancelled at any time. The data processed up to the point of cancellation may 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) lit. a) GDPR. The data is processed anonymously by softgarden for evaluation purposes.

For more information on easyfeedback's data protection, please refer to the following notes: [Privacy Policy](#) | [Data Protection](#) | [easyfeedback](#)

## Talent Pool

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

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 level
- preferred location(s)
- XING profile or resume

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

## Sharing the status information of an application

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 with the respective job board. To do this, our service provider, softgarden e-recruiting LLC, transmits the status of your application (receipt, processing of the application, rejection) to the job board on our behalf. The status is displayed in your account on the job board with a time delay (up to four weeks) so that we can inform you personally about the status of your application beforehand. 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.

## Deletion and use of data

Your data will be stored for the duration of the application process and in accordance with the legitimate retention periods after completion of the application process. In the event of rejection, the data will be retained for 6 months. After successful recruitment, the data will be retained for a further 6 months. After the retention period has expired, the data will be completely anonymised. The processing of anonymised data records is not subject to the scope of the data protection regulations, meaning that anonymised data can be processed for statistical and analytical purposes, for the creation of market studies, or for product development.

## Your rights as a data subject

### Rights of data subjects

Data subjects are entitled to know at any time whether their personal data has been stored and can exercise their right to access stored data (right to information), verify its accuracy (right to rectification), request its supplementation and updating, request its deletion (right to be forgotten), request the restriction of processing (right to restriction), and port/have the data ported 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 that prevent this. To exercise these rights, please contact [datenschutz@uni-wh.de](mailto:datenschutz@uni-wh.de) or write to the address shown 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 this does not affect the lawfulness of the processing carried out up to the point of withdrawal. In addition, you have the right to object to processing, for example if the data is or has been processed incorrectly, or if other reasons in the interest of the data subject prevent (further) processing. Data subjects also have the right to complain to the supervisory authority responsible for data processing.

Please note that in the event of an objection and/or revocation, certain services/processing activities can no longer be performed or used if the processing is necessary for these purposes.

## **Automated decision-making**

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

## **Changes to this privacy policy**

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

## **Version**

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