

## Information on Data Protection in Applicant Management According to Art. 13 GDPR

In the course of the employment relationship, personal data about you is collected. Therefore, we are required by the new regulations in the General Data Protection Regulation (GDPR) to inform you of the following in accordance with Article 13 ff. GDPR:

The party responsible for the collection and processing of your data is:

BonVenture Management GmbH  
Ridlerstr. 33  
Phone: +49/89/2000125-30  
Fax: +49/89/2000125-39

The contact information of our data protection officer is:

Christian Volkmer  
Projekt 29 GmbH & Co. KG  
Ostengasse 14  
93047 Regensburg  
Email: [c.volkmer@projekt29.de](mailto:c.volkmer@projekt29.de)  
Phone: +49/941-2986930

Your data is collected and processed as part of the hiring process or for the execution of the employment relationship.

The necessary data includes, in particular, your basic personal information (e. g. first and last name, name suffixes, nationality), your contact details (e. g. private address, mobile and landline number, email address), other data from the employment relationship, such as timekeeping data, vacation periods, periods of incapacity to work, skill data, social data, bank account information, social security number, pension insurance number, salary data, tax identification number, special health data, and any criminal records), as well as log data generated during the use of IT systems.

Your personal data is primarily collected directly from you. However, due to legal requirements, some of your data may also be collected from other entities, such as the tax office for the purpose of querying tax-relevant information, the health insurance provider for information on periods of incapacity to work, or, if applicable, from other third parties such as a recruitment agency or from publicly accessible sources (e. g. professional networks).

Within our company, only those individuals who need your data to fulfill our contractual and legal obligations, such as the HR department, the accounting department, and the relevant department, will have access to your personal data.

If we engage service providers to fulfill our contractual and legal obligations, they will also receive the necessary data. These service providers include, among others, the following: tax consultants, auditors, IT service providers, external data protection officers, lawyers, notaries, and other consultants.

Outside the company, we transmit your data to additional recipients, as far as this is necessary to fulfill our contractual and legal obligations. This includes, in particular, the social insurance agencies, health insurance providers, pension insurance, professional pension institutions, the employment agency, the trade association, the financial authorities, accident and liability insurance companies, courts, banks, relevant authorities to ensure claims from company pension schemes or asset-building benefits, third-party debtors in the case of wage and salary garnishments, or insolvency administrators in the case of personal bankruptcy.

Your data will not be transferred to a third country.

Primarily, the processing of your data serves the purpose of establishing, carrying out, and terminating the employment relationship. The relevant legal basis for this is Article 6(1)(b) GDPR in conjunction with Section 26(1) BDSG. Additionally, collective agreements (such as company-wide, overall, and operational agreements as well as collective bargaining regulations) according to Article 6(1)(b) in conjunction with Article 88(1) GDPR and Section 26(4) BDSG, as well as any separate consents you may provide according to Article 6(1)(a) and Article 7 GDPR in conjunction with Section 26(2) BDSG (e.g., for video recordings), may be used as data protection legal grounds.

We also process your data to fulfill our legal obligations as an employer, particularly in the areas of tax and social security law. This is done on the basis of Article 6(1)(c) GDPR in conjunction with Section 26 BDSG.

Where necessary, we also process your data based on Article 6(1)(f) GDPR to protect legitimate interests of ourselves or third parties (e.g., authorities). This applies particularly in the investigation of criminal offenses (legal basis: Section 26(1) sentence 2 BDSG) or within the corporate group for purposes of group management, internal communication, and other administrative purposes.

Where special categories of personal data are processed in accordance with Article 9(1) GDPR, this serves to exercise rights or fulfill legal obligations arising from employment law, social security law, and social protection within the employment relationship (e.g., providing health data to health insurance, recording disability status for additional leave, and determining disability contributions). This is done on the basis of Article 9(2)(b) GDPR in conjunction with Section 26(3) BDSG. Additionally, the processing of health data may be necessary to assess your work ability in accordance with Article 9(2)(h) GDPR in conjunction with Section 22(1)(b) BDSG.

Additionally, the processing of special categories of personal data may be based on consent in accordance with Article 9(2)(a) GDPR in conjunction with Section 26(2) BDSG (e.g., for occupational health management). If we wish to process your personal data for a purpose not mentioned above, we will inform you beforehand.

If your job application is rejected, the data you have provided will be deleted six months after the rejection is communicated. This does not apply if a longer retention period is required due to legal obligations (such as the burden of proof under the General Equal

Treatment Act) or if you have explicitly consented to a longer retention period in our applicant database.

The retention period for the collected data is limited to the duration of the employment relationship. We will delete your personal data once it is no longer required for the purposes mentioned above. After the employment relationship ends, data will be retained in accordance with legal or regulatory retention periods, which are specified by laws such as the Commercial Code and the Tax Code. These retention periods can extend up to ten years. Additionally, personal data may be retained for the statutory limitation period, which can be three or up to 30 years, in case any claims are made against us.

You have the right to request information from your employer about the personal data stored about you. Under certain conditions, you may request the correction or deletion of your data. You also have the right to request a restriction on the processing of your data and, additionally, the right to receive your provided data in a structured, commonly used, and machine-readable format.

### **Right to object**

You also have the right to object to the processing of your personal data for direct marketing purposes without providing any reasons. If we process your data to safeguard legitimate interests, you can object to this processing on grounds related to your particular situation. In such cases, we will no longer process your personal data unless we can demonstrate compelling, legitimate reasons for the processing that override your interests, rights, and freedoms, or if the processing is necessary for the establishment, exercise, or defense of legal claims.

You have the right of complaint regarding the handling of your personal data with the aforementioned Data Protection Officer or the data protection supervisory authority. The authority responsible for you is:

Bavarian State Office for Data Protection Supervision  
Promenade 18  
91522 Ansbach  
Phone: +49/981 180093-0  
Fax: +49/981 180093-800  
Email: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

The provision of personal data is necessary for the establishment, execution, and termination of the employment relationship and constitutes a contractual obligation of the employee. If we do not receive the required data, it will not be possible to carry out the employment relationship with you.