

Privacy Policy

Version 2.1.0

The purpose of this privacy policy is to provide transparent information about the storage, processing and protection of personal data by HeyJobs.

Notice in the sense of the Equal Treatment Act:

For reasons of easier readability, no gender-specific differentiation, e.g. applicant, is used here. Corresponding terms apply to all genders for the purpose of equal treatment.

HeyJobs reserves the right to update this Privacy Policy at any time, for example due to changes in the law, regulatory requirements, or adjustments to our services. The currently valid version is always available at the following link: <https://www.heyjobs.co/recruiting/datenschutz>

In the event of significant changes to this Privacy Policy, we will notify affected users via email or through a notice on the platform before the changes take effect. If a change affects the processing of your data that is based on your consent, we will obtain your consent again before the change applies to you.

1. Scope

This privacy policy applies to all services and performances that we offer to our customers and applicants in Europe. This is regardless of whether we do so via a website, an app, in stores, by telephone at events or via social networks.

These privacy provisions apply without exception:

- for all website visitors
- as a supplement to the General Terms and Conditions
- as the basis for all cooperation agreements concluded (companies that are linked to HeyJobs by a validly concluded cooperation agreement are referred to below as "employers" or "customers")
- Users (hereinafter referred to as "Applicants") of the HeyJobs service and website who apply for open positions via the HeyJobs website.

2. Name and address of the controller

The controller within the meaning of the GDPR for the services described in this privacy policy is:

HeyJobs GmbH
Paul-Lincke-Ufer 39/40
10999 Berlin, Germany
support@heyjobs.co

For users in Austria, HeyJobs GmbH is the controller via its Austrian branch. Further information can be found in our [Legal Notice](#).

3. Contact details of the external data protection officer

Our external data protection officers for Austria and Germany are:

DataCo GmbH
Sandstraße 33
80335 München
Germany
datenschutz@heyjobs.de

4. General information on data processing

Your data is collected, processed, and used by HeyJobs GmbH (service provider within the meaning of national laws or the EU General Data Protection Regulation).

This Privacy Policy refers to the use of all websites operated by HeyJobs GmbH (hereinafter referred to as "HeyJobs", "we", "our"), including all subpages, content, and functions available there - both as passive users (visitors without registration - passive data collection) and as active users (visitors with registration - active data collection). Individual parts of HeyJobs are also referred to below as the offer, services, or online services. Overall, this refers to the HeyJobs service.

5. Rights of the data subject

- **Right of access:** You have the right to request copies of your personal data from us.
- **Right to rectification:** You have the right to request that we correct any personal data you believe is inaccurate. You also have the right to request that we complete information you believe is incomplete.
- **Right to erasure:** You have the right to request that we erase your personal data, under certain conditions.
- **Right to restriction of processing:** You have the right to request that we restrict the processing of your personal data, under certain conditions.
- **Right to object to processing:** You have the right to object to the processing of your personal data, under certain conditions.
- **Right to data portability:** If processing is based on your consent or a contract and is carried out by automated means, you have the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format. You may also request that we transmit this data directly to another controller, where technically feasible. Please note that this right does not apply to processing operations based on a legitimate interest (Art. 6 (1) (f) GDPR).
- **Right to lodge a complaint with a supervisory authority:** Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data infringes the GDPR.

There are no fees for exercising these rights. Requests will be processed within one month.

The supervisory authority with which the complaint has been lodged shall inform the complainant of the status and outcome of the complaint, including the possibility of a judicial remedy under Art. 78 GDPR.

The supervisory authority responsible for HeyJobs in Germany:

Berliner Beauftragte für Datenschutz und Informationsfreiheit
Alt Moabit 59-61
10555 Berlin
Tel.: +49 30 13889-0
Fax: +49 30 2155050
E-Mail: mailbox@datenschutz-berlin.de

The supervisory authority responsible for HeyJobs in Austria:

Österreichische Datenschutzbehörde
Barichgasse 40-42

6. Processing of Applicant Data (Talent Platform)

6.1. Website Visit

Scope of Processing Personal Data

When you visit our website <https://www.hejobs.co/de-de>, we automatically collect the following technical data:

- Browser type and operating system
- Referrer URL
- Date, time, and duration of the visit
- IP address
- Internet provider

Purpose of Data Processing

This data is processed to ensure the technical provision of our website to your browser, maintain the security and stability of our systems, and improve our services.

Legal Basis

The legal basis for the processing is the legitimate interest in the secure and functional operation of our website pursuant to Art. 6 (1) lit. f GDPR.

Duration of Storage

This data is stored only as long as necessary to fulfill the specified purpose and is deleted as soon as it is no longer needed. If statutory retention obligations exist, the data will be retained for the legally required period.

6.2. Registration

Scope of processing of personal data

Website visitors (primarily applicants) have the option to register on our Talent Platform. If you create a profile and use our platform, we process the following personal data:

- First and last name
- Email address
- Place of residence
- Phone number
- Resume
- IP address of the accessing computer
- Date and time of registration

For registration, we use a double opt-in process: after registration, an activation link is sent via email to confirm the account. This link is valid for 24 hours and can only be used once.

If information is provided on our platform that we need to verify, we may conduct a verification process to ensure that the information actually originates from you. The personal data collected is limited to the information actively provided and is stored as part of the profile data in accordance with the retention periods described under "Storage duration," regardless of whether the verification is completed. Unverified information is marked accordingly. One-time verification codes (OTPs) sent for this purpose are deleted immediately after their use or expiration. We may use third-party providers for verification with whom we have concluded data processing agreements pursuant to Art. 28 GDPR. If these providers are located outside the EU/EEA, data transfers are secured through appropriate transfer mechanisms pursuant to Art. 46 GDPR. Information collected for verification purposes is not used for marketing purposes without your separate and explicit consent.

Purpose of processing

The processing serves to create a profile on the Talent Platform in order to be able to use it. Subsequently, (quick) application processes can be carried out and HeyJobs services can be used.

Legal basis for processing

The legal basis for the processing is the performance of a contract with the user pursuant to Art. 6 (1) sentence 1 lit. b) GDPR.

Duration of storage

Personal data is only stored for as long as is necessary to fulfill the stated purpose and is deleted as soon as it is no longer needed. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can terminate the contractual relationship at any time by deleting your profile directly in your account settings.

Login options (Single-Sign-On - "SSO")

In addition to standard registration, it is also possible to log in with an existing Google or Meta account. HeyJobs has concluded data transfer agreements with the providers listed below. The legal basis is Art. 6 (1) lit. b) GDPR: performance of the contract for setting up your user account.

Google:

Transmitted by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland: First name, last name, email address.
Privacy Policy: <https://policies.google.com/privacy?hl=en>

Meta:

Transmitted by Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland: First name, last name, email address.
Privacy Policy: <https://www.meta.com/about/privacy/update/printable>

6.3. Innovative Features

HeyJobs offers various [innovative features](#) to enable users to search for jobs in a simple and pleasant way:

6.3.1. Personalized Job Advertisements

Scope of processing of personal data

A core function of HeyJobs is to suggest relevant job advertisements to users, even outside the HeyJobs platform and even when users are not actively looking for a job. For more information, please see our GTCs.

For this purpose, HeyJobs processes personal data that you have provided or that results from your use of our platform, for example contact details (name, email address, telephone number), profile information (such as profession, skills, career level, education and location preferences) as well as usage data (e.g. search and click behavior). HeyJobs can combine these categories to determine which job advertisements are most relevant to you.

Provided that you have given your consent, HeyJobs will transmit this data in pseudonymized form to providers of internet applications, including social networks operated by Meta (Facebook and Instagram), Google, TikTok and LinkedIn. These platforms use the data to show you personalized job advertisements. For this purpose, HeyJobs may also create user and target group profiles based on your profile data.

Purpose of data processing

The purpose of the processing is to show you job offers tailored to you in internet applications and to create the user and target group profiles required for this.

Information on profiling

HeyJobs compares your profile data (including job field, location and experience level) with the requirements of current job advertisements in order to determine relevant job offers for you. As a result, you may be shown relevant job advertisements on third-party platforms such as Meta, Google, TikTok or LinkedIn. This profiling has no legal effect and does not lead to similarly significant decisions concerning you. It serves solely to present you with relevant job offers.

Legal basis for the processing of personal data

The legal basis for the transmission of your profile data to third-party platforms (Meta, Google, TikTok, LinkedIn) for the display of personalized job advertisements is your consent pursuant to Art. 6 (1) (a) GDPR, which you can give or revoke at any time via your profile settings or cookie settings. If personalized advertisements are displayed using cookies or similar tracking technologies on your device, your prior consent pursuant to Section 25 (1) TDDG is also required. Processing that is strictly necessary for matching your profile with relevant job advertisements within the HeyJobs platform is based on Art. 6 (1) (b) GDPR (performance of contract).

For the matched audience creation step, HeyJobs and the respective platform operator act as joint controllers within the meaning of Art. 26 GDPR, limited to the target group creation process. The essential terms of these agreements are published in the respective controller addenda of Meta, Google, TikTok and LinkedIn.

Duration of storage

Personal data is only stored for as long as is necessary to fulfill the stated purpose and is deleted as soon as it is no longer needed. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can revoke your consent to the display of personalized job advertisements on third-party platforms at any time via your profile settings or cookie settings. The revocation does not affect the lawfulness of the processing carried out before the revocation. To terminate the contractual relationship completely, you can delete your profile directly in your account settings at any time.

6.3.2. Personalized Job Recommendations via SMS/RCS

Scope of processing of personal data

Provided you have given your consent, we will send you personalized job recommendations via SMS or RCS (Rich Communication Services) to the telephone number you provided. Consent can be given in two ways: by activating the checkbox in your profile settings or during the application process. In both cases, a two-step process (double opt-in) applies: after giving your initial consent, you will receive a confirmation SMS to confirm this. The following personal data is processed:

- Telephone number
- Profile data (e.g. job field, location, experience level) to personalize the recommendations

Purpose of data processing

The processing serves the purpose of sending you job advertisements tailored to your profile via SMS or RCS.

Legal basis for the processing of personal data

The legal basis for this processing is your consent pursuant to Art. 6 (1) (a) GDPR. For sending, we use third-party messaging service providers with whom we have concluded data processing agreements pursuant to Art. 28 GDPR. If these providers are located outside the EU/EEA, data transfers are secured through appropriate guarantees pursuant to Art. 46 GDPR.

Duration of storage

Personal data is only stored for as long as is necessary to fulfill the stated purpose and is deleted as soon as it is no longer needed, at the latest upon revocation of your consent. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can revoke your consent at any time by sending STOP to +491771787073 or by deactivating SMS/RCS notifications in your profile settings. After revocation, your telephone number and associated profile data will no longer be used for this purpose. The revocation does not affect the lawfulness of the processing carried out before the revocation.

6.3.3. Push Notifications via PWA

Scope of processing of personal data

If you have granted permission for push notifications, we will send you notifications with personalized job recommendations and application updates via our Progressive Web App (PWA) or as web push notifications via your browser. The following personal data is processed:

- Push subscription: A unique endpoint and security key generated by your browser, used to deliver notifications to your specific browser or the installed PWA. The endpoint is provided by your browser provider's push service (e.g., Google, Mozilla, or Apple)
- Profile information (e.g., job field, location, experience level) to personalize the messages

Purpose of data processing

The processing serves the purpose of sending you personalized job recommendations and updates on your applications via push notification.

Legal basis for the processing of personal data

The legal basis is your consent pursuant to Art. 6 (1) (a) GDPR. Consent is obtained in two steps: First, you are asked within our website or PWA whether you would like to receive notifications. Only if you agree will the native query of your browser or operating system be triggered. Your push token is stored with an external provider for customer communication, with whom we have concluded a data processing agreement pursuant to Art. 28 GDPR. If this provider operates outside the EU/EEA, data transfers are secured through appropriate guarantees pursuant to Art. 46 GDPR.

Duration of storage

Personal data is only stored for as long as is necessary to fulfill the stated purpose and is deleted as soon as it is no longer needed, at the latest upon revocation of your permission. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can revoke your consent for push notifications at any time via your device's operating system settings or by uninstalling the PWA. After revocation, your push token will be deleted and no further push notifications will be sent. The revocation does not affect the lawfulness of the processing carried out before the revocation.

6.3.4. Personalized Job Recommendations via WhatsApp

Scope of processing of personal data

Provided you have given your consent, we will send you personalized job recommendations via WhatsApp to the telephone number you provided. Consent can be given by clicking the checkbox in your profile settings or during the application process. In both cases, a two-step process (double opt-in) applies: After your initial consent, you will receive a confirmation message via WhatsApp to confirm this. The following personal data is processed:

- Telephone number
- Profile data (e.g., job field, location, experience level) to personalize the recommendations

To send messages, we use Braze, Inc. (28 East 28th Street, 12th Floor, New York, NY 10016, USA) as our provider of the WhatsApp Business API, with whom we have concluded a data processing agreement pursuant to Art. 28 GDPR. Your data is stored on Braze's EU servers in Frankfurt. Access from the USA is secured by the EU-US Data Privacy Framework and standard contractual clauses. Messages are delivered via WhatsApp, which is operated by Meta Platforms Ireland Ltd., 4 Grand Canal Square, Dublin 2, Ireland, which processes the data as an independent controller according to its own privacy policy, available at <https://www.whatsapp.com/legal/privacy-policy-eea>.

Purpose of data processing

To send you job recommendations tailored to your profile via WhatsApp.

Legal basis for the processing of personal data

The legal basis for this processing is your consent pursuant to Art. 6 (1) (a) GDPR. When data is transmitted outside the EU/EEA, it is secured by appropriate guarantees pursuant to Art. 46 GDPR.

Duration of storage

Your telephone number and associated profile data are only stored for as long as is necessary to fulfill the stated purpose and are deleted as soon as they are no longer needed, at the latest upon revocation of your consent. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can revoke your consent at any time by clicking the unsubscribe link in the WhatsApp messages you subscribed to or by deactivating WhatsApp notifications in your profile settings. After revocation, your telephone number and associated profile data will no longer be used for this purpose. The revocation does not affect the lawfulness of the processing carried out before the revocation.

6.3.5. Email Notifications and Communication Settings

Scope of processing of personal data

Provided you have given your consent during registration, we process your email address and profile data (such as job field, location and experience level) to send you emails supporting your job search. These may include job recommendations and other job-search-related content. You can manage your preferences and unsubscribe from certain email types at any time via your account settings.

Purpose of data processing

To send you relevant job-search-related content via email, tailored to your profile and preferences.

Legal basis for the processing of personal data

The legal basis is your consent pursuant to Art. 6 (1) (a) GDPR. Insofar as emails concern services that you have already used, sending them may additionally be based on the existing customer relationship pursuant to Section 7 (3) UWG.

Duration of storage

Personal data is only stored for as long as is necessary to fulfill the stated purpose and is deleted as soon as it is no longer needed, at the latest upon revocation of your consent or unsubscription. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can revoke your consent or adjust your email preferences at any time via your account settings. The revocation does not affect the lawfulness of the processing carried out before the revocation.

6.3.6. Quizzes by HeyJobs

Scope of processing of personal data

HeyJobs offers quizzes on job-related topics on its website (e.g., "Which job fits you best?" or "Are you prepared for your interview?").

To provide our quizzes, we use the services of Kinsta Inc., 8605 Santa Monica Blvd #92581, West Hollywood, CA 90069, USA (hereinafter "Kinsta") as a data processor within the meaning of Art. 28 GDPR for hosting the quizzes. Kinsta hosts content on the Google Cloud Platform. HeyJobs selects the data center location, with EU-based data centers available. Insofar as personal data is nonetheless transferred to a third country outside the EEA, such transfers are secured by the EU Standard Contractual Clauses pursuant to Art. 46 (2) (c) GDPR and, for transfers from the UK, by the International Data Transfer Addendum issued by the UK ICO, which have been concluded between HeyJobs and Kinsta. The following personal data is processed:

- First and last name
- Email address
- Place of residence
- Telephone/mobile number
- IP address of the accessing computer

Purpose of data processing

The purpose of the processing is the provision of quizzes on the HeyJobs website on various job-related topics for HeyJobs users as well as for potential users who might be interested in registering with HeyJobs.

Legal basis for the processing of personal data

For users without a HeyJobs account, the legal basis is our legitimate interest pursuant to Art. 6 (1) (f) GDPR, namely the

promotion of our platform and addressing potential users through interactive job-related content. For registered users, the legal basis is additionally the performance of our contract with you pursuant to Art. 6 (1) (b) GDPR.

Duration of storage

Personal data is only stored for as long as is necessary to fulfill the stated purpose and is deleted as soon as it is no longer needed. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can object to the processing based on legitimate interest at any time. If you are a registered user, you can also request the deletion of your data via your account settings or by contacting datenschutz@heyjobs.de.

6.4. Your Application to a Company

Scope of processing of personal data

All job advertisements published by HeyJobs for companies contain an application form for electronic applications. If you use this option, the data entered in the form will be transmitted by HeyJobs to the respective company and stored. This data may include:

- First name
- Last name
- Address
- Telephone/mobile number
- Email address
- Details of education and schooling
- Language skills
- Resume
- References and certificates
- Screening questions from companies, where applicable

Depending on the job advertisement, additional data may be required due to specific operational or regulatory requirements of the position.

HeyJobs advises against including special categories of personal data within the meaning of Art. 9 GDPR (such as health information, disability status, or religious beliefs) in your application documents. If you voluntarily provide such data despite this notice, you thereby grant your express consent pursuant to Art. 9 (2) (a) GDPR for HeyJobs to forward this data to the respective employer as part of your application. HeyJobs processes such data exclusively for this forwarding purpose and does not use it for other purposes. The employer is independently responsible for all further processing of such data after receipt.

Your application may be forwarded to the employer's own applicant management system (ATS). Insofar as data is transferred outside the EU/EEA, EU standard contractual clauses are in place. For the technical conversion of application documents (e.g., PDF processing), we use a document processing provider based in the EU.

When your application is transmitted by HeyJobs to the employer's ATS, the employer updates the application status. HeyJobs synchronizes this status in the [Recruiter Portal](#) made available to the employer.

In some cases, companies hire external agencies to work with us on their behalf to publish and distribute job advertisements and manage recruitment processes.

Alternatively, you can also send your application by email to arbeitgeberservice@heyjobs.de. In this case, we collect your email address and any data you voluntarily provide and forward this to the respective company.

After submitting your application, you will receive an acknowledgment of receipt by email from HeyJobs.

Use of Textkernel

For processing and structuring your application documents submitted via our platform, we use Textkernel B.V., Nieuwendammerkade 26A-5, 1022 AB Amsterdam, Netherlands ("Textkernel"). Textkernel's AI-supported parsing technology

extracts and structures relevant information from resumes and application documents (such as professional experience, qualifications, and skills) to support the application forwarding and matching process. Insofar as data is transferred outside the EU/EEA, it is protected by EU standard contractual clauses pursuant to Art. 46 GDPR. The legal basis for this processing is the performance of our contract with you pursuant to Art. 6 (1) (b) GDPR. Further information can be found in Textkernel's privacy policy: <https://www.textkernel.com/privacy-policy/>

Use of Kombo

Insofar as your application is transmitted to an employer's ATS, we use Kombo Technologies GmbH, Brunnenstraße 19, 10119 Berlin, Germany ("Kombo") as a technical integration platform and processor pursuant to Art. 28 GDPR. A data processing agreement has been concluded. Kombo forwards your application data in real-time from HeyJobs to the employer's ATS. No data transfers outside the EU/EEA take place via Kombo. The legal basis for this processing is the performance of our contract with you pursuant to Art. 6 (1) (b) GDPR. Further information can be found in Kombo's privacy policy: <https://kombo.dev/privacy>

Purpose of processing

We process your personal data to handle your application using the application form or the email you sent.

Legal basis of processing

The legal basis for the processing of your application data is the performance of our contract with you pursuant to Art. 6 (1) (b) GDPR. Insofar as you voluntarily include special categories of personal data in your application documents, the additional legal basis is your express consent pursuant to Art. 9 (2) (a) GDPR, as described in the "Scope" section.

Duration of storage

Personal data is stored only for as long as is necessary to fulfill the stated purpose and is deleted as soon as it is no longer needed. Applications are automatically deleted from HeyJobs six months after receipt, unless you agree to store your data for a further six months on our Talent Platform. Insofar as statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can request the deletion of your application data at any time by contacting us at datenschutz@heyjobs.de. Please note that this only affects data stored in HeyJobs' systems. Data that has already been transmitted to the employer and is stored by them cannot be deleted by us. To request the deletion of this data, you must contact the employer directly; contact details are available in the job advertisement or in the confirmation email after submission. Please note that deletion requests terminate all active application processes. Statutory retention obligations may apply to processing by the employer after receipt of your application.

6.5. Employer Application Forms (Submission Forms)

Scope of processing of personal data

In certain cases, HeyJobs operates dedicated application forms on behalf of specific employers. If you submit an inquiry or application through such a form, the data you enter is forwarded directly to the relevant employer. The categories of data typically processed include: first name, last name, email address, phone number, date of birth, postal code, and any other information you provide.

Purpose of data processing

The forwarding is carried out exclusively for the purpose of establishing contact between you and the relevant employer. HeyJobs does not use the data transmitted as part of this service for its own tracking, advertising, or sales purposes. HeyJobs may additionally, with your consent, record pseudonymous conversion events (e.g. form submissions) for its own internal marketing measurement purposes.

Legal basis for the processing of personal data

In this context, HeyJobs acts solely as a technical service provider (processor) on behalf of the employer. The employer is the controller within the meaning of the GDPR and is responsible for determining the legal basis for processing your data. Information on the applicable legal basis and the employer's data protection practices can be found in the employer's privacy policy. Section 25 TDDG additionally applies to the use of cookies and similar technologies on these pages. For channel/campaign tracking using these cookies, HeyJobs acts as an independent controller on the basis of your consent (Art. 6(1)(a) GDPR).

Recipient

The recipient of your data is the relevant employer. HeyJobs processes the data submitted through this form exclusively on behalf of the employer under a data processing agreement pursuant to Art. 28 GDPR and in accordance with the employer's documented instructions. The employer is the controller within the meaning of the GDPR and is responsible for all further processing of your data. Further information can be found in the employer's privacy policy.

Storage duration

HeyJobs stores your data only for the period technically necessary to forward and confirm the submission, for a maximum of 7 days. After this period has elapsed, your data will be deleted by HeyJobs, unless statutory retention obligations apply.

Termination of data processing

Since HeyJobs acts as a processor in this context, any request to withdraw consent or delete your data must be directed to the relevant employer as the controller. The employer's contact details are available in the respective job posting or the form confirmation. HeyJobs deletes any data still stored in its systems after the 7-day retention period has elapsed or upon notification from the employer.

6.6. Automated Application Submission (HeySubmit)**Scope of processing of personal data**

When you use HeySubmit, HeyJobs automatically completes and submits your application on your behalf on the career website of the respective employer. For this purpose, HeyJobs temporarily processes the personal data that you provided as part of your application on the HeyJobs platform. The typical categories of data processed include:

- First and last name
- Email address
- Phone number
- Address/Zip code
- Resume and professional experience data
- Answers to screening questions
- Any further information you provided as part of your application

Purpose of data processing

Submission of your application to the respective employer on your behalf via automated form filling on the career website or in the employer's applicant tracking system. HeyJobs does not use the data transmitted within the scope of this service for its own tracking, advertising, or sales purposes. HeyJobs may additionally collect anonymized conversion events (e.g., form submissions) for its own internal marketing measurement purposes.

Legal basis for the processing of personal data

The legal basis for this processing is the performance of our contract with you pursuant to Art. 6 (1) (b) GDPR, as the automated submission is an essential part of the HeySubmit service you have requested. To the extent that you additionally provide your express authorization at the time of application, this also constitutes consent pursuant to Art. 6 (1) (a) GDPR.

Recipient

The recipient of your application data is the respective employer via their career website or applicant tracking system. To the extent that HeyJobs employs a third-party provider for the technical execution of the automated submission, this provider acts as a data processor pursuant to a data processing agreement under Art. 28 GDPR and processes your data exclusively on the instructions of HeyJobs. Insofar as such providers are located outside the EU/EEA, data transfers are secured through appropriate mechanisms pursuant to Art. 46 GDPR, in particular EU standard contractual clauses. The employer is independently responsible for all further processing of your data after receipt. Further information can be found in the employer's privacy policy.

Notice regarding automated processing

HeySubmit uses an automated system to fill out application fields on third-party websites on your behalf. This system does not evaluate your application and does not make an assessment of your suitability for a position. It exclusively performs technical form filling. HeySubmit does not involve automated individual decision-making within the meaning of Art. 22 GDPR.

Storage duration

HeyJobs stores your application data for six months from the submission date, in accordance with the retention period

applicable to all applications submitted via the HeyJobs platform. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can cancel the application process at any time before submission. Once your application has been successfully submitted to the employer, your data will be retained by HeyJobs for six months in accordance with the duration described above. Please note that a revocation does not reverse a submission that has already been made to the employer. To request the deletion of data stored by the employer, you must contact them directly. To request a revocation or the deletion of data stored by HeyJobs, please contact us at datenschutz@heyjobs.de or cancel the process directly on the platform.

6.7. Use of HeyAssessment

Scope of processing of personal data

When using HeyAssessment, we process the following personal data:

- First name
- Last name
- Email address
- Telephone/mobile number
- Information on professional qualifications (e.g. education, professional experience, certificates)
- Language skills
- Company screening questions, where applicable
- Answers to assessment questions (e.g. preferences, availability, additional qualifications)
- Resume and other provided documents (e.g. references and certificates)
- Results from interaction with the chatbot (e.g. additional information or clarifications)

Purpose of processing

Personal data is processed for the following purposes:

- Support of the application process by providing detailed, job-relevant information for recruiters,
- Creation of a structured report based on the data provided, which is attached to the application documents and forwarded to the employer as part of your application,
- Improvement of the platform through analysis and further development of our services, exclusively using anonymized or aggregated data.

Legal basis for processing

The legal basis for processing your HeyAssessment data to support your application and to create a structured report for the employer is the fulfillment of our contract with you pursuant to Art. 6 (1) lit. b GDPR. Insofar as HeyJobs uses anonymized or aggregated HeyAssessment data to improve and further develop its platform, the legal basis is our legitimate interest pursuant to Art. 6 (1) lit. f GDPR. You can object to processing based on legitimate interest at any time by contacting datenschutz@heyjobs.de.

Note on automated processing and AI Act disclosure

HeyAssessment is supported by artificial intelligence. The use of HeyAssessment does not include automated individual decision-making within the meaning of Art. 22 GDPR. All decisions regarding your application remain with the employer.

Pursuant to Art. 26 (11) of the EU AI Act, HeyJobs informs you that HeyAssessment uses an AI system that falls into the category of high-risk AI systems pursuant to Annex III of the EU AI Act, as it is used in the context of recruitment and candidate assessment. Human oversight is maintained throughout: The structured report generated by HeyAssessment is provided to the employer exclusively as an information tool and does not replace human review of your application. You have the right to request an explanation of how this system was applied in your specific case by contacting datenschutz@heyjobs.de.

AI Providers

The AI functions within HeyAssessment and related product features (including resume analysis and automated matching) are provided by the following providers:

OpenAI: We use models from OpenAI, L.L.C., 3180 18th Street, San Francisco, CA 94110, USA ("OpenAI") to process and analyze application responses and documents. Data transfers to the USA are protected by EU Standard Contractual Clauses pursuant to Art. 46 GDPR. Further information: <https://openai.com/policies/privacy-policy>

Amazon Bedrock: We use Amazon Bedrock, provided by Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, 1855 Luxembourg, on behalf of Amazon Web Services, Inc., USA ("Amazon Bedrock"), for hosting and operating product functions based on large language models, including assessment analysis. Data is processed within the EU infrastructure (Frankfurt region) if selected by HeyJobs; insofar as transfers take place outside the EU, these are protected by EU Standard Contractual Clauses and additional protective measures pursuant to Art. 46 GDPR. Further information: <https://aws.amazon.com/privacy/>

HeyAssessment Performance Evaluation

After completing your assessment session, HeyJobs uses an AI-powered internal quality assurance tool (the "Quality Evaluator") to evaluate the technical quality and accuracy of HeyAssessment outputs. This tool uses a large language model to verify whether the platform has produced correct, consistent, and high-quality results, for example whether the questions reflected the job requirements, your answers were correctly captured, and the PDF report sent to the employer correctly summarizes your answers. The Quality Evaluator is used exclusively for internal quality assurance purposes, is not visible to you as a candidate, and has no influence on the content of your application or decisions that employers make about you. Evaluation results are exclusively accessible to the engineering and product teams of HeyJobs.

The processed data includes your assessment session responses and associated metadata in pseudonymized form. Structured personal fields such as name and contact details are excluded from the evaluation payload. Free-text responses are included, as the evaluator must verify whether responses were correctly captured, and may incidentally contain personal data. No model training takes place with your personal data.

The legal basis for this processing is the legitimate interest of HeyJobs pursuant to Art. 6 (1) lit. f GDPR, namely ensuring the technical reliability and quality of its platform to protect both candidates and customers from platform errors. You can object to this processing at any time by contacting datenschutz@heyjobs.de.

Storage duration

Personal data is only stored for as long as is necessary to fulfill the stated purpose and is deleted as soon as it is no longer needed. In accordance with section 6.4, assessment data linked to your application is deleted six months after submission, unless you have consented to extended storage on our Talent Platform. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can request the deletion of your HeyAssessment data stored at HeyJobs at any time by contacting us at datenschutz@heyjobs.de. Please note that this only affects data stored in HeyJobs' systems. Data already transmitted to the employer must be deleted by contacting the employer directly. Contact details are available in the respective job advertisement or the application confirmation.

Please note that deletion requests terminate all active application processes.

6.8. Automated Suitability Analysis as Part of Application Processing

Scope of processing of personal data

To support employers in reviewing applications, HeyJobs automatically compares answers to screening questions and HeyAssessment results with the job requirements defined by the employer. This includes a deterministic criteria comparison and an AI-supported summary. A structured suitability indication is displayed to the employer in the Recruiter Portal, which reflects how well the provided qualifications match the advertised requirements. All decisions regarding the further progress of the recruitment process are made independently by the employer.

Purpose of data processing

Provision of a structured information basis for employers that facilitates and accelerates the review of applications. This also benefits applicants, as suitable applications can be identified and prioritized more quickly.

Information on profiling

Automated suitability analysis constitutes profiling within the meaning of Art. 4 No. 4 GDPR, as it involves the automated processing of personal data to evaluate certain aspects of your professional qualifications in relation to a specific position. The

result is a structured suitability indication that is displayed to the employer in the Recruiter Portal. This indication does not constitute an automated individual decision within the meaning of Art. 22 GDPR and does not determine the outcome of your application. All hiring decisions are made exclusively by the employer. The practical consequence is that applications rated as a strong match may receive the attention of recruiters more quickly.

Legal basis for the processing of personal data

The legal basis for this processing is our legitimate interest pursuant to Art. 6 (1) (f) GDPR. Our legitimate interest lies in the efficient support of the recruitment process for employers and the effective operation of the HeyJobs platform. Since the suitability indication does not make a decision about your application but serves exclusively as an information basis for a human decision-maker, and because the data used is limited to information you have already provided as part of your application, this interest outweighs the protected interests of applicants.

Duration of storage

The suitability indication is retained for the duration of the recruitment process and is deleted at the latest when the associated application documents are deleted, usually six months after receipt of the application. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You may object to the processing of your personal data for the purposes of automated suitability analysis at any time for reasons arising from your particular situation by contacting us at datenschutz@heyjobs.de. If an objection is raised, HeyJobs will cease this processing unless it can demonstrate compelling legitimate grounds that outweigh your interests, rights, and freedoms.

7. Processing of Your Application at HeyJobs

7.1. Your Application at HeyJobs

Scope of processing of personal data

An application form for positions at HeyJobs is available on our website (www.heyjobs.co) for electronic applications. If you use this option, the data entered in the form will be transmitted to us and stored. This data may include:

- Salutation
- First name
- Last name
- Address
- Telephone/mobile number
- Email address

Alternatively, you can send us your application by email. In this case, we collect your email address and any data you provide voluntarily. After submitting your application, you will receive an acknowledgment of receipt by email from us.

Online Sourcing of Applicants

Occasionally, our recruiting team searches online for candidates for our open positions. We may include personal data (such as name, contact details, and a link to the respective profile) from publicly available sources such as LinkedIn, XING, or other professional networks in our recruitment process. The legal basis for this processing is our legitimate interest pursuant to Art. 6 (1) (f) GDPR, namely the identification and contacting of suitable candidates for our open positions. If no suitable position is available at the time of storage, your data may be stored in our internal Talent Platform with your prior consent so that we can contact you regarding open positions in the future. For the storage of personal data from public profiles in our internal recruiting systems, we use the service providers described in section 7.2.

Purpose of data processing

Processing your application at HeyJobs and managing the application process. Data processed during the submission process is additionally used to prevent abuse of the application form and to ensure the security of our IT systems (see also "Error Tracking" in this privacy policy).

Legal basis for the processing of personal data

The legal basis for the processing of your data is Art. 88 (1) GDPR in conjunction with Section 26 (1) BDSG (data processing for employment purposes).

Duration of storage

After completion of the application process, your data will be stored for up to six months and then deleted, unless you agree to store your data for a further 24 months on our Talent Platform. If statutory retention obligations exist, the data will be stored for the legally prescribed period. You can request the deletion of your data at any time by email at datenschutz@heyjobs.de. Please note that this will terminate all ongoing application processes.

Termination of data processing

You can object to the processing of your personal data at any time by contacting datenschutz@heyjobs.de. Please note that in this case, your application can no longer be considered and all personal data stored in connection with your application will be deleted.

7.2. AI-based Interview as Part of the Application Process (Madita)

Scope of processing of personal data

As part of your application process, we may invite you to participate in an AI-supported interview conducted by Madita (<https://madita.ai/>), a product of HeyJobs GmbH. The processing takes place in three steps:

Step 1 Preparation: Your application documents (name, contact details, application materials) are read by AI to generate role-specific interview questions. No evaluation takes place.

Step 2 AI Interview: Participation is voluntary. Processed data includes your contact details, voice recording, and transcript of the interview. Pursuant to Art. 50 (1) of the EU AI Act, we inform you that you are interacting with an AI system and not with a human. Madita is classified as a high-risk AI system pursuant to Annex III No. 4 of the EU AI Act. All hiring decisions are made by a human. There is no fully automated decision-making within the meaning of Art. 22 GDPR.

Step 3 Anonymization: After the interview, all personal identifiers are completely removed. The anonymized data no longer falls within the scope of the GDPR.

Purpose of data processing

Step 1 serves for structured interview preparation. Step 2 serves to assess your suitability for the advertised position. Step 3 serves to minimize the volume of stored personal data.

Legal basis for the processing of personal data

- Step 1: Art. 6 (1) (b) GDPR in conjunction with Section 26 BDSG
- Step 2: Art. 6 (1) (a) GDPR (consent, voluntary, can be revoked at any time without disadvantage)
- Step 3: Art. 6 (1) (f) GDPR (legitimate interest in data minimization)

Storage duration

Personal data is deleted no later than six months after receipt of your application, provided no statutory retention obligations exist.

Termination of data processing

You can revoke your consent (Step 2) and object to the processing in steps 1 and 3 at any time by contacting datenschutz@heyjobs.de. The revocation does not affect the lawfulness of the processing carried out before the revocation.

7.3. Use of Ashby

Scope of processing of personal data

We use Ashby, provided by Ashby, Inc., USA ("Ashby"), to manage our web-based application process. The following personal data is processed by Ashby:

- Contact information
- Details of previous activities
- Education information
- Resume and application documents
- Feedback on interviews
- Communication data
- Any further information you voluntarily provide in your application

If you provide special categories of personal data within the meaning of Art. 9 (1) GDPR as part of your application, this data is also transmitted to Ashby and processed by Ashby. Data is transferred to Ashby servers in the USA and protected by EU standard contractual clauses pursuant to Art. 46 (2) (c) GDPR.

Purpose of data processing

Provision of a web-based application process for HeyJobs and management of applications submitted to us.

Legal basis for the processing of personal data

The legal basis for the processing of your data is Art. 88 (1) GDPR in conjunction with Section 26 (1) BDSG (data processing for employment purposes).

Storage duration

After completion of the application process, your data will be stored for up to six months and then deleted, unless you agree to store your data for a further 24 months on our Talent Platform. If statutory retention obligations exist, the data will be stored for the legally prescribed period. You can request the deletion of your data at any time by email at datenschutz@heyjobs.de. Please note that this will terminate all ongoing application processes.

Termination of data processing

You can revoke your consent or object to the processing of your personal data at any time by contacting datenschutz@heyjobs.de. The revocation of consent does not affect the lawfulness of the processing carried out before the revocation. Further information on the rights of data subjects regarding Ashby can be found at: <https://www.ashbyhq.com/resources/privacy>

7.4. Use of Third-Party Recruiting and Assessment Tools

To support our internal talent acquisition processes and application management, we may use AI-supported third-party tools and competency assessment tools. These include tools for candidate sourcing, outreach sequencing, recruitment workflow automation, and pre-hiring competency assessments for specific technical roles.

These providers act as data processors on behalf of HeyJobs pursuant to data processing agreements under Art. 28 GDPR and process your data exclusively on the instructions of HeyJobs. Insofar as providers are based outside the EU/EEA, appropriate transfer protection measures pursuant to Art. 46 GDPR are in place, in particular EU standard contractual clauses. Insofar as providers are based in the UK, data transfers are covered by the EU adequacy decision for the UK pursuant to Art. 45 GDPR. No model training takes place with your personal data.

The legal basis for this processing is Art. 88 (1) GDPR in conjunction with Section 26 (1) BDSG (data processing for employment purposes) and, insofar as sourcing is carried out before an application, our legitimate interest pursuant to Art. 6 (1) (f) GDPR in identifying suitable candidates for our open positions.

For further information on the specific providers used, please contact us at datenschutz@heyjobs.de.

8. Processing of Data from Companies (Employees)

8.1. Employer Website

Scope of processing of personal data

Visitors to our employer website <https://www.heyjobs.co/recruiting/>, mainly company employees, can learn about collaborating with HeyJobs, access information about our services, contact us for consultation, and register for the Recruiter Portal. We collect the following data when you visit our website:

- IP addresses
- Browser information
- Usage data
- Date and time of visit
- Location information
- Cookie ID

Purpose of data processing

Transmission of our website content to your browser, ensuring technical operation of the website, as well as improvement of our product and services.

Legal basis for the processing of personal data

The legal basis for this processing is our legitimate interest pursuant to Art. 6 (1) (f) GDPR in the operation and improvement of our employer website.

Duration of storage

Personal data is stored only as long as is necessary to fulfill the stated purpose and deleted as soon as it is no longer needed. If statutory retention obligations exist, the data will be stored for the legally prescribed period.

Termination of data processing

You can object to the processing of your personal data based on legitimate interest at any time by contacting datenschutz@heyjobs.de.

8.2. Recruiter Portal

The Recruiter Portal is a platform via which HeyJobs customers can access and use HeyJobs services, including creating job advertisements, communicating via the platform, and managing incoming applications. Access is restricted to authorized personnel (e.g., recruiters, hiring managers, or HR managers) with employer login credentials.

Scope of processing of personal data

The following personal data of authorized Recruiter Portal users is processed:

- First name
- Last name
- Login data
- Salutation
- Email address
- Company affiliation and position
- IP address
- Date and time of registration and access
- All other voluntarily provided information (e.g., phone number or photo)

Purpose of data processing

Provision and operation of the Recruiter Portal, management of the registration process, and enabling the creation and management of job advertisements.

Legal basis for the processing of personal data

The legal basis for this processing is the performance of our contract with the employer customer pursuant to Art. 6 (1) (b) GDPR and our legitimate interest pursuant to Art. 6 (1) (f) GDPR in the provision and maintenance of the Recruiter Portal and the fulfillment of our contractual obligations towards customers.

Duration of storage

Personal data is stored only as long as is necessary to fulfill the stated purpose and deleted at the latest upon termination of the contractual relationship, provided no statutory retention obligations require further storage.

Termination of data processing

You can object to processing based on legitimate interest at any time by contacting datenschutz@heyjobs.de. Insofar as

processing is based on contract fulfillment, data will be deleted upon termination of the contractual relationship in accordance with the above-mentioned retention period.

8.3. Communication in the Recruiter Portal and on the Employer Website

Recruiter Portal Support Chat

HeyJobs uses a third-party customer support chat service in the Recruiter Portal to facilitate communication between companies and the HeyJobs Customer Success Team. The following data is processed: content of sent and received chat messages, context information (e.g., the page on which the chat was used), and IP address. The legal basis is our legitimate interest pursuant to Art. 6 (1) (f) GDPR in providing effective customer support. Personal data is deleted as soon as it is no longer required for the support purpose and in accordance with our standard retention periods.

Website and Employer Website Communication

For customer and visitor communication on our website and employer website, we use the following categories of third-party providers: (i) a chatbot and messaging platform for automated visitor engagement on the employer website, (ii) a managed live chat provider for real-time visitor support, and (iii) a customer communication platform (shared inbox) used internally by our team to manage incoming communication. These providers act as data processors on behalf of HeyJobs in accordance with data processing agreements pursuant to Art. 28 GDPR. Insofar as providers are based outside the EU/EEA, data transfers are protected by EU standard contractual clauses pursuant to Art. 46 GDPR. The legal basis for this processing is our legitimate interest pursuant to Art. 6 (1) (f) GDPR in the effective management of customer and visitor communication.

8.4. Online Meetings and Recordings

As part of our continuous efforts to improve the quality of our services, we may record online meetings held via platforms such as Google Meet, Zoom, Microsoft Teams, Demodesk, Cisco Webex, or Crowdcast. Recordings help ensure that no important details are lost and that we can meet customer requirements as accurately as possible. You are always informed before a meeting is recorded, and participation is never tied to consent to recording.

Scope of processing of personal data

The following personal data may be processed during recordings:

- Visual recordings (video of participants)
- Audio recordings
- First and last name (as displayed on the meeting platform)
- Job title and company affiliation (if provided in the platform profile)
- Chat messages exchanged during the meeting
- Content of all shared screen materials containing personal data

Meeting recordings and associated data are stored in our Salesforce CRM system (see section 10.5). If recordings are transcribed or processed, we may use a third-party provider for transcription and audio processing. Personal data contained in recordings is processed exclusively for internal quality assurance purposes. If such providers are based outside the EU/EEA, data transfers are protected by EU Standard Contractual Clauses pursuant to Art. 46 GDPR.

Purpose of data processing

Improvement of our services and ensuring high-quality customer support, as well as deriving conclusions about potential improvements to our service offerings.

Legal basis for the processing of personal data

The legal basis for recording and storing meetings is your consent pursuant to Art. 6 (1) (a) GDPR. Consent is obtained before the first recording and can be revoked at any time by contacting datenschutz@heyjobs.de. The revocation does not affect the lawfulness of the processing carried out before the revocation.

Duration of storage

Personal data is only stored for as long as is necessary to fulfill the stated purpose and is deleted as soon as it is no longer needed. You can object to the storage at any time or revoke your consent by contacting datenschutz@heyjobs.de.

Further information

For further information on the privacy practices of the platforms used, please refer to the corresponding privacy policies:

Google Meet: [Privacy Policy](#)

Zoom: [Privacy Policy](#)

Microsoft Teams: [Security Information](#)

Demodesk: [Privacy Policy](#)

Cisco Webex: [Privacy Policy](#)

Crowdcast: [Privacy Policy](#)

8.5. Salesforce (CRM)

We use Salesforce, a Customer Relationship Management (CRM) platform from Salesforce, Inc., 415 Mission Street, San Francisco, CA 94105, USA ("Salesforce"), to manage our employer sales pipeline, customer success activities, and contact details of employer representatives. The following personal data of employer contacts is processed: Name, email address, telephone number, job title and company affiliation, as well as communication and interaction history. Data transfers to the USA are protected by EU Standard Contractual Clauses pursuant to Art. 46 GDPR. The legal basis for this processing is our legitimate interest pursuant to Art. 6 (1) (f) GDPR in managing our business relationships and fulfilling our contractual obligations to customers. Further information can be found in Salesforce's privacy policy: <https://www.salesforce.com/company/privacy/>

8.6. Use of HeyFlow

For multi-step contact and inquiry forms on our website, we use HeyFlow, a form builder platform from HeyFlow GmbH, based in the EU ("HeyFlow"). If you submit a contact request or inquiry via a HeyFlow-powered form, the data you enter (including name, email address, company, and message) is processed via HeyFlow before being forwarded to HeyJobs. There are no data transfers outside the EU/EEA. A data processing agreement pursuant to Art. 28 GDPR has been concluded with HeyFlow. The legal basis for this processing is our legitimate interest in managing incoming contact requests pursuant to Art. 6 (1) (f) GDPR or the performance of pre-contractual measures pursuant to Art. 6 (1) (b) GDPR. Further information can be found in HeyFlow's privacy policy: <https://heyflow.com/privacy-policy>

9. Provision of the Website and Creation of Log Files

Scope of processing of personal data

Every time our platform is accessed, our system automatically collects the following technical data from the accessing device and stores it in log files:

- Browser type and version
- Operating system
- IP address
- Date and time of access
- If applicable, Cookie ID and usage data

This data is not linked to other personal data.

Purpose of data processing

Transmission of our website content to your browser, ensuring technical operation and security (including error analysis, abuse detection), as well as improvement of our product and services.

Legal basis for data processing

The legal basis is our legitimate interest in the reliable operation of the website pursuant to Art. 6 (1) (f) GDPR.

Storage duration

Personal data is stored only as long as is necessary to fulfill the stated purpose and deleted as soon as it is no longer needed.

Termination of data processing

You can object to processing based on legitimate interest at any time by contacting us at datenschutz@heyjobs.de. We will

then stop processing the data unless we can demonstrate compelling legitimate grounds or the processing serves the assertion, exercise, or defense of legal claims.

9.1. SSL/TLS Encryption

HeyJobs uses SSL/TLS encryption (at least 128-bit), recognizable by "https://" in the address bar. In addition, we use appropriate technical and organizational measures to protect against unauthorized access, loss, or alteration.

9.2. External Hosting

We host our website on Amazon Web Services, provided by Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, 1855 Luxembourg ("AWS"). Primary server location: Frankfurt am Main, Germany.

Data transfer to the US parent company may take place; this is secured by EU Standard Contractual Clauses pursuant to Art. 46 GDPR and additional safeguards.

Details: <https://aws.amazon.com/blogs/security/aws-gdpr-data-processing-addendum/>.

Privacy Policy: <https://aws.amazon.com/privacy/>.

Legal basis

The use of AWS is based on Art. 6 (1) (f) GDPR. We have a legitimate interest in the most reliable presentation of our website.

10. Use of Cookies - General Information

HeyJobs GmbH ("we" or "us" or "our") may use cookies, web beacons, and other tracking technologies when you visit our website www.heyjobs.co and www.heyjobs.co/recruiting/ visit, including other media forms, media channels, mobile websites, or mobile applications that are related or linked thereto (collectively referred to as the "Website"), to customize the website and improve your experience.

We use cookies to make our platform more user-friendly. Cookies help us understand how the website is used and help us improve the user experience. Some elements of our platform require that the accessing browser can also be identified after a page change.

The following data is stored and transmitted in the cookies:

- Language settings
- Log-in information
- Entered search terms
- Frequency of page views
- Use of platform functions
- Cookie consent information

The data is not stored together with other personal data of the users.

Details about the cookies used on the website, the providers of these cookies, and the specific purpose the cookies fulfill can be found in the [Cookie Settings](#) (Talent Website) and [Cookie Settings](#) (Employer Website). You can revoke your consent to data processing at any time, without affecting the lawfulness of the processing based on consent before its withdrawal. Furthermore, a subsequent change to the cookie settings is possible.

10.1. Consent Tool

This website uses Usercentrics' cookie consent technology to obtain your consent to the storage of certain cookies on your device or the use of certain technologies and to document this in a data protection-compliant manner. The provider of this technology is Usercentrics GmbH, Sendlinger Straße 7, 80331 Munich, website: <https://usercentrics.com/de/>

When entering our website, the following personal data is transmitted to Usercentrics:

- Consent(s) or the revocation of your consent(s)
- IP address

- Information about your browser
- Information about your device
- Time of your visit to the website

Furthermore, Usercentrics stores a cookie in your browser to be able to assign the given consents or their revocation. The data collected in this way is stored until we are requested to delete it, the Usercentrics cookie itself is deleted, or the purpose for data storage no longer applies. Mandatory statutory retention periods remain unaffected.

The use of Usercentrics is intended to obtain the legally required consents for the use of certain technologies. The legal basis for this is Art. 6 (1) sentence 1 (c) GDPR.

10.2. Control of Cookies

Most browsers are set to accept cookies by default. However, cookies can be removed or rejected in the browser settings. Please note that this can affect the availability and functionality of the website.

Further information on how to control cookies can be found in the browser or device settings or under the following links:

[Apple Safari](#) | [Google Chrome](#) | [Microsoft Edge](#) | [Microsoft Internet Explorer](#) | [Mozilla Firefox](#) | [Opera](#) | [Android \(Chrome\)](#) | [Blackberry](#) | [Iphone or Ipad \(Chrome\)](#) | [Iphone or Ipad \(Safari\)](#)

11. Error Tracking

Purpose of data processing

If malfunctions or error messages occur during your visit to the website or the application process (for example, while filling out the application form), data from users and applicants that has already been collected is cached. Data is cached in the error-tracking tools used exclusively for the purpose of troubleshooting. Data transfers to the USA take place on the basis of EU standard contractual clauses pursuant to Art. 46 GDPR.

The legal basis for the processing under (i) is our legitimate interest pursuant to Art. 6 (1) (f) GDPR; for the processing under (ii), insofar as personal data of identifiable users is collected, our legitimate interest pursuant to Art. 6 (1) (f) GDPR in improving the user experience in the Recruiter Portal also applies.

Further information can be found in DataDog's privacy policy: <https://www.datadoghq.com/legal/privacy/>

Legal basis of data processing

The legal basis for this processing is our legitimate interest pursuant to Art. 6 (1) (f) GDPR.

Duration of storage

Personal data stored when malfunctions/errors occur is not stored beyond the troubleshooting process and is automatically deleted.

12. Data Transfer

12.1. Data Transfer to a HeyJobs-Affiliated Company (Within the Group)

We only transfer or process data within a HeyJobs-affiliated company if this processing is consented to, is legally required, or is contractually necessary.

HeyJobs GmbH currently operates in Germany and Austria.

Further information can be found above under "Name and address of the controller."

12.2. Data Transfer to Third Countries Outside the EU

We only transfer or process data in countries outside the EU (third countries) if this processing has been consented to, is legally required, or is contractually necessary, and in any case only to the extent generally permitted. For further information on the principle of data transfer under the GDPR, we refer here to [Chapter 5, Art. 44 et seq. GDPR](#).

More detailed information can be found in the respective data processing sections.

13. Communication

13.1. Email Forwarding to Companies

Scope of processing of personal data

When users use our internal messaging system to apply for a position or to contact a company or recruiter, this message is forwarded by our system via email to the recipient. To protect the privacy of users and to avoid disclosing their email address to the company, a HeyJobs email address appears in the address field of the recipient of the message. This consists of the full name that users provided during registration, a unique ID, and our domain "hey.jobs" ("firstname.lastnameID@hey.jobs"). The same process occurs in reverse when users receive a reply to their message or a message from recruiters via our platform.

For personal data sent via email, this is the case when the respective conversation with the user is terminated. A conversation is terminated when the application was successful and hiring has taken place, or the application was unsuccessful and hiring has not taken place.

Purpose of data processing

To facilitate simple communication between the parties and to create a fast, applicant-friendly application process and to simplify communication.

Legal basis for the processing of personal data

The legal basis for this processing is our legitimate interest pursuant to Art. 6 (1) (f) GDPR in enabling convenient communication between applicants and recruiters and providing a consistent user experience.

Duration of storage

The data will be deleted as soon as they are no longer necessary for the achievement of the purpose of their collection. The respective recruiters can transmit the messages to their own systems. HeyJobs has no influence on the systems of the respective recruiters.

13.2. HeyJobs Internal Chat Function

Scope of processing of personal data

When recruiters use our internal messaging system to contact an applicant, this message is forwarded by our system to the applicant. The applicant sees the full name that the recruiter provided during registration. The same process occurs in reverse when the recruiter receives a message from an applicant via our platform.

In this context, we process the names of the applicant and the responsible person from the employer, and only the content of the messages from the responsible person from the employer.

To offer this service, we use Amazon Web Services (AWS) (server location Frankfurt am Main).

Purpose of data processing

To facilitate simple communication between the parties, to create a fast, applicant-friendly application process, and to simplify communication.

Legal basis for the processing of personal data

The legal basis for this processing is our legitimate interest pursuant to Art. 6 (1) (f) GDPR in enabling convenient communication between applicants and recruiters and offering a consistent user experience.

Duration of storage

The data will be deleted as soon as they are no longer necessary for the achievement of the purpose of their collection. The respective recruiters can transmit the messages to their own systems. HeyJobs has no influence on the systems of the respective recruiters.

13.3. 14.3 Email Contact with HeyJobs

Scope of processing of personal data

You can contact us via our provided email address (support@heyjobs.de). In this case, the personal data transmitted with the email is stored. The data is used exclusively for processing the conversation.

Purpose of data processing

In the case of contact via email, our legitimate interest in processing the data also applies.

Legal basis for the processing of personal data

The legal basis for processing data transmitted in the course of sending an email is Art. 6 (1) (f) GDPR. If the email contact aims at the conclusion or performance of a contract, the legal basis for processing is Art. 6 (1) (b) GDPR.

Duration of storage

The data is deleted as soon as it is no longer necessary to achieve the purpose of its collection. For personal data sent by email, this is the case when the respective conversation with the user has ended. The conversation is ended when it can be inferred from the circumstances that the matter in question has been conclusively clarified.

Right to object and erasure

You can object to the processing of your personal data at any time. Please send an informal email to datenschutz@heyjobs.de. In such a case, the conversation cannot be continued.

13.4. WhatsApp Business Plattform

We offer visitors to our website the option to contact us via the WhatsApp messaging service provided by WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. For this purpose, we use the so-called "Business Version" of WhatsApp.

If we are contacted via WhatsApp in relation to a specific application, we store and use the mobile phone number used on WhatsApp as well as, if provided, the first and last name pursuant to Art. 6 (1) (b) GDPR for processing and answering the request.

If our WhatsApp contact is used for general inquiries (e.g., initial contact, questions about applications, etc.), we store and use the mobile phone number used on WhatsApp as well as, if provided, the first and last name pursuant to Art. 6 (1) (a) GDPR on the basis of consent for the efficient and timely provision of the requested information.

The data is always used only to answer the request via WhatsApp. There is no further transfer to third parties. Please note that WhatsApp Business gains access to the address book of the mobile device we use and automatically transfers phone numbers stored in the address book to a server of the parent company Meta Inc. in the USA.

The purpose and scope of data collection and the further processing and use of the data by WhatsApp, as well as your rights and settings options for protecting your privacy, can be found in WhatsApp's privacy policy: <https://www.whatsapp.com/legal?eea=1#privacy-policy>

13.5. Chatbot on Our Website

We use a chatbot service on our website to offer automated support to visitors. This involves processing conversation content as well as technical data (e.g., IP address). The legal basis is our legitimate interest pursuant to Art. 6 (1) (f) GDPR. A data processing agreement pursuant to Art. 28 GDPR has been concluded with the provider.

14. Marketing Initiatives / Forms

We use the service HubSpot to provide the following online forms. For this purpose, we forward data entered in the respective form to HubSpot, which processes the data exclusively on our behalf. See the privacy policy for [HubSpot](#) (Location: 25 First Street, Cambridge, MA 021341, USA).

14.1. Events (HeyDays & Webinars) for Companies

For the planning and execution of events, HeyJobs requires personal data of the participants.

Scope of processing of personal data

We process the following personal data:

- First and last name
- Salutation and job title
- Business email address
- Telephone number
- Company name

Purpose of data processing

The processing serves the purpose of invitation management via email, sending registration confirmations via email, sending reminders before the event via email, sending further information or short-term changes to the registered event participants, optimization of event planning, and general contract initiation.

Legal basis for processing

The legal basis for the processing of personal data is your consent pursuant to Art. 6 (1) (a) GDPR.

Storage duration

The data is generally stored only for as long as is necessary to achieve the purpose.

Possibility of revocation

You can object to the processing of your personal data at any time. To do so, please send an informal email to datenschutz@heyjobs.de or use the unsubscribe button at the end of each email. The revocation does not affect the lawfulness of the processing carried out before the revocation.

Joint controllership with event partners

For certain webinars and events, HeyJobs cooperates with third-party partners under joint controllership pursuant to Art. 26 (1) GDPR. If a partner is involved, this will be clearly communicated to participants in advance.

The following partners may be involved:

Trendence Institut GmbH
Friedrichstraße 67-70
10117 Berlin
<https://www.trendence.com/datenschutz>

softgarden e-recruiting GmbH
Tauentzienstraße 14
10789 Berlin
<https://softgarden.com/de/datenschutz-webseite/>

Cammio GmbH
Gehrtsstr. 14
40235 Düsseldorf
<https://cammio.com/de/datenschutzerklaerung/>

In any case, HeyJobs and the respective partner are jointly responsible for the processing of participant data in connection with the event, including consent management and technical implementation. Each partner is also responsible for the processing of contact data of participants transmitted by HeyJobs in the context of the cooperation.

In the context of the joint controllership agreement, the following categories of data are processed:

- Contact and registration data (name, job title, company, telephone number, email address)
- Usage and log data
- Content and communication data
- Profile data

In this context, no data transfers to third countries take place.

Legal basis for the processing of personal data

Art. 6 (1) (a) GDPR (consent) and, if applicable, Art. 6 (1) (b) GDPR (contract performance).

As a participant, you can exercise your rights as a data subject against any of the joint controllers.

14.2. E-Learning Course "SuperRecruiter" for Companies

The online course "SuperRecruiter" is provided on the Thinkific platform, offered by Thinkific Labs Inc., #400,369 Terminal Ave, Vancouver, BC V6A 4C4, Canada. Further information: [here](#).

Contact: info@thinkific.com

Scope of processing of personal data

The following personal data is required for registration:

- First and last name
- Salutation, position and organization
- Email address
- IP address as well as date and time of registration
- Payment data

Purpose of data processing

To process the registration, grant access to the course, and communicate with participants regarding the course they have taken.

Legal basis for the processing of personal data

- Art. 6 (1) (b) GDPR for data required for registration and course access.
- Art. 6 (1) (a) GDPR for all voluntary, optional data.

Storage duration

Data is deleted as soon as it is no longer required for the purpose for which it was collected. For users making a one-time payment, data is deleted 4 weeks after successful completion of the course.

Payment processing

Stripe: We use Stripe, Inc., 510 Townsend St., San Francisco, CA 94103, USA for payment processing. The following data is transmitted to Stripe as far as necessary for contract fulfillment pursuant to Art. 6 (1) (b) GDPR:

- Name, email address, customer and order number
- Bank and credit card details (including card number, expiration date, CVC)
- Transaction amount, date, time and location

Data transfers to the USA are protected by EU Standard Contractual Clauses pursuant to Art. 46 GDPR. Data is stored for as long as necessary for payment processing, including refunds, debt management, and fraud prevention.

More info: <https://stripe.com/privacy-center/legal>

FastSpring: We use FastSpring, provided by Bright Market, LLC, dba FastSpring, 801 Garden Street, Suite 201, Santa Barbara, CA 93101, USA for subscription and payment processing related to certain HeyJobs products. Processed data includes: name, email address, billing address, payment details and transaction information. Data transfers to the USA are protected by EU Standard Contractual Clauses pursuant to Art. 46 GDPR. Legal basis is Art. 6 (1) (b) GDPR.

More info: <https://fastspring.com/privacy/>

14.3. Web Demo for Companies

If you request an appointment for a web demo, we use your data to contact you and to schedule and conduct an appointment.

Scope of processing of personal data

We process the following personal data:

- First and last name
- Email address
- Telephone number
- Company name

Purpose of data processing

Coordination, preparation, conduct, and follow-up of the requested web demo.

Legal basis for the processing of personal data

Performance of pre-contractual measures pursuant to Art. 6 (1) (b) GDPR.

Storage duration

Data is deleted as soon as it is no longer required for the preparation, conduct, and follow-up of the appointment.

14.4. Competitions

We occasionally hold competitions. Personal data is collected exclusively within the scope of the respective competition and on the basis of the participant's explicit consent. The applicable competition-specific privacy notices are provided at the time of data collection.

14.5. Use of HeyFlow (Contact and Inquiry Forms)

For multi-step contact and inquiry forms on our website, we use HeyFlow, a form builder platform from HeyFlow GmbH, based in the EU ("HeyFlow"). If you submit a contact request or inquiry via a HeyFlow-powered form, the data you enter (including name, email address, company, and message) is processed via HeyFlow before being forwarded to HeyJobs. There are no data transfers outside the EU/EEA. A data processing agreement pursuant to Art. 28 GDPR has been concluded with HeyFlow.

Legal basis for the processing of personal data

Art. 6 (1) (f) GDPR (legitimate interest in processing incoming contact requests) or Art. 6 (1) (b) GDPR (pre-contractual measures), depending on the nature of the request.

Further information: <https://heyflow.com/privacy-policy>

14.6. Use of GenderAPI

For the personalization of outreach communication, we use GenderAPI, a name-based gender inference service from GenderAPI.io, operated from Germany. First names from our B2B contact records are processed to determine an appropriate salutation. There are no data transfers outside the EU/EEA. A data processing agreement pursuant to Art. 28 GDPR has been concluded with GenderAPI. The legal basis is our legitimate interest in sending professional and appropriately personalized outreach communication pursuant to Art. 6 (1) (f) GDPR. You can object to this processing at any time by contacting datenschutz@heyjobs.de.

15. Direct Marketing for Companies

In connection with our sales and marketing activities towards business contacts, we use the following categories of providers, all of which process professional contact data of company representatives: B2B sales prospecting providers, B2B data enrichment and automation providers, cold email outreach providers, email validation providers, B2B contact data verification providers, social media outreach providers, email signature and branding providers, event planning providers, web scraping and automation providers, content creation and development platforms, as well as personalization and landing page

platforms. Insofar as providers are based outside the EU/EEA, data transfers are secured by EU standard contractual clauses pursuant to Art. 46 GDPR. The legal basis is our legitimate interest in business development pursuant to Art. 6 (1) (f) GDPR.

15.1. Newsletter

Description and Scope of Data Processing

Users have the possibility to subscribe to our newsletter on our platform. The following personal data is processed by us:

- First and last name
- Email address
- IP address of the accessing computer
- Browser type
- Operating system
- Date and time of registration

Purpose of Data Processing

The processing of the data serves the purpose of sending the newsletter.

Legal Basis for Data Processing

The legal basis for the processing of personal data is your consent pursuant to Art. 6 (1) (a) GDPR.

Duration of Storage

The data is deleted as soon as it is no longer required for the purpose for which it was collected. The user's email address is therefore stored as long as the newsletter subscription is active. The newsletter subscription can be canceled by the user at any time. A corresponding link can be found in every newsletter.

Other Recipients

For the distribution of newsletters and push notifications, we use external service providers for email and customer communication, with whom we have concluded data processing agreements pursuant to Art. 28 GDPR.

Termination of Data Processing

You can unsubscribe at any time via the unsubscribe link in each newsletter or contact us at datenschutz@heyjobs.de. The revocation does not affect the lawfulness of the processing carried out before the revocation.

15.1.1. Email Sending

For sending newsletters and transactional emails, we use external email service providers with server locations in the USA. Data transfer is based on EU standard contractual clauses pursuant to Art. 46 GDPR. Processing includes email address as well as technical usage data (e.g., open and click rates). The legal basis is your consent pursuant to Art. 6 (1) (a) GDPR.

15.1.2. Newsletter Marketing and Push Notifications

For newsletter marketing and push notifications, we use external customer communication service providers with server locations outside the EU. Data transfer is based on EU standard contractual clauses pursuant to Art. 46 GDPR. User data such as email address, push tokens, interaction data, and IP address are processed. The legal basis is your consent pursuant to Art. 6 (1) (a) GDPR. You can revoke your consent at any time by unsubscribing from the newsletter, deactivating push notifications in your device settings, or by sending an informal email to datenschutz@heyjobs.de.

15.2 Postal Advertising for Companies

Scope and Description of Data Processing

We use your address to send postal advertising.

Purpose of Data Processing

We use postal advertising to maintain contact with existing customers and to acquire new customers.

Legal Basis for Data Processing

The legal basis for postal advertising is our legitimate interest pursuant to Art. 6 (1) (f) GDPR. For existing customers, the legal

basis for postal advertising is our legitimate interest pursuant to Art. 6 (1) (f) GDPR in conjunction with Section 7 (3) UWG, according to which direct marketing to existing customers is permitted without prior consent, provided that the communication relates to similar products or services. For potential customers, postal advertising is based on your consent pursuant to Art. 6 (1) (a) GDPR. You can object to postal advertising at any time by contacting datenschutz@heyjobs.de.

Duration of Storage

Your address remains with us until the purpose for data processing no longer applies. If you make a legitimate request for erasure or revoke your consent to postal advertising, your data will be deleted, unless we have other legally permissible reasons for storing your personal data.

Right to Object and Erasure

You can object to the processing of your personal data at any time. Please send an informal email to datenschutz@heyjobs.de.

16. Web Analysis Tools (Statistics)

Tracking or web analysis tools are used on our website to evaluate the usage behaviour of website visitors and to optimize our service. These tools and the cookies they use can be used to investigate, for example, how and from where visitors come to our site, which areas of a website are visited particularly often, and how often and for how long which subpages and categories are viewed. In addition, we can determine which search terms and websites the user has entered and evaluate which information or offers are in most demand. The goal is to use the insights gained from this to make our offerings and our website user-friendly and to align our offerings more specifically with our customers, visitors, and interested parties.

The legal basis is Art. 6(1)(a) GDPR. You can also revoke your consent to data processing at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

In the area of web and user analysis, we work with professional service providers who create user statistics on our behalf (and in the event of your consent). The legal basis for each of these processing activities is your consent pursuant to Art. 6(1)(a) GDPR.

17. Remarketing-Tools (Marketing)

So-called remarketing tools are used on our website. With the help of these tools, we can display or have displayed customized job advertisements on our websites based on visitor preferences. Technically, ad tracking usually occurs via advertising IDs, through which providers of advertising networks build user profiles (partly via cookies), and when a website is accessed, the advertisement is delivered based on the cookie profile. Through such remarketing offers, customized job advertisements can be presented to a user. In many cases, tracking is also carried out via browser fingerprints, which utilize information such as individual screen resolution settings, color depth, time zone, and installed plug-ins to recognize users or user groups.

With the help of remarketing tools, we can target our offerings more specifically to our customers, visitors, and interested parties. In addition, based on user behavior, we can determine which areas of our website may be of particular interest to visitors in order to display targeted advertising. The legal basis for the use of required cookies is Art. 6 (1) lit. a GDPR, which is why we obtain your consent in advance.

The details of the providers involved in this processing can be found in your cookie settings ([Talent Website](#) | [Employer Website](#)).

18. Social Media and Fan Pages

Through the use of social media platforms with server locations in the USA, personal data may be processed outside the EU. To ensure appropriate safeguards for protecting the transfer and processing of personal data outside the EU, data transmission to and processing by social media operators outside the EU takes place based on appropriate guarantees pursuant to Art. 46 et seq. GDPR, in particular through the conclusion of standard data protection clauses pursuant to Art. 46 (2) lit. c GDPR.

Our corporate presence in social networks is used for communication and information exchange with (potential) customers. Publications via our corporate presence may include the following content:

- Information about products
- Information about services

- Competitions
- Advertising
- Customer contact

Users are free to publish personal data through their activities. This includes the following providers:

- Information about products
- Information about services
- Competitions
- Advertising
- Customer contact

Users are free to publish personal data through their activities.

This includes the following providers:

Meta: Meta Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland [Meta Privacy Policy](#)

Instagram: Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland [Instagram Privacy Policy](#)

X (formerly Twitter): X Corp., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA [X Privacy Policy](#)

LinkedIn: LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Ireland [LinkedIn Privacy Policy](#)

XING: XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany [XING Privacy Policy](#)

YouTube: Google Ireland Limited, Gordon House, Barrow Street, D04 E5W5, Dublin, Ireland [YouTube Privacy Policy](#)

TikTok: TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland [TikTok Privacy Policy](#)

18.1 Agreement with Meta Pursuant to Art. 26 GDPR

We operate our fan pages (on Meta) under joint responsibility with the social media platform. In the context of interaction via our fan page, we receive statistical data on the use of our fan pages from Meta. This includes, for example, details on interactions, likes, comments, or aggregated information and statistics (e.g., regarding age or origin of our followers), which help us understand interactions with our page. Further details regarding the nature and scope of these statistics can be found in Meta's Page Insights Notice and regarding the respective responsibilities in Meta's Page Insights Controller Addendum. The legal basis for this data processing is Art. 6 (1) sentence 1 lit. f) GDPR.

We have no influence on data processed by the provider (Meta) under its own responsibility according to Meta's terms of use. We point out that when visiting the fan page, data concerning your user behavior is transmitted by Meta and the fan page to Meta. Further information can be found in Meta's privacy policy.

Further information on data processing by Meta can be found at <https://www.Meta.com/about/privacy>.

Controllers

Controllers within the meaning of Art. 26 GDPR are Meta Ireland Ltd. and HeyJobs. Details on the allocation of responsibilities can be found in the following agreement: https://www.Meta.com/legal/terms/page_controller_addendum

1. Meta Ireland Ltd.
Grand Canal Square
Grand Canal Harbour
D2 Dublin
Ireland

2. HeyJobs GmbH
Paul-Lincke-Ufer 39/40
10999 Berlin
Germany

Data Processing by Meta

Meta collects tracking data regarding interactions on the Meta page. The collection and provision of Insights data (<https://www.Meta.com/business/a/page/page-insights>) takes place under Meta's responsibility. Meta is responsible for

fulfilling rights under the GDPR. As the fan page operator, HeyJobs GmbH has no influence on the collection and provision of this data. Personal data processing associated with this takes place exclusively at Meta.

The nature and scope of information you provide to Meta, the associated purposes of data processing, their lawfulness, as well as information on exercising your rights can be found in Meta's Privacy Policy and further information provided by Meta regarding "Insights Data".

The Data Policy is available at <https://www.Meta.com/policy.php>.

Your rights to information, rectification, erasure, restriction of processing, and data portability of your stored data must be asserted against Meta. You can contact Meta's Data Protection Officer at <https://www.Meta.com/help/contact/540977946302970>.

Data Processing by HeyJobs

HeyJobs uses Meta's corporate presence to provide content and communicate with Meta users.

We receive statistical data about visitors to our Meta pages from Meta via the "Insights" function (<https://www.Meta.com/business/a/page/page-insights>) and use the provided anonymized data based on Art. 6 (1) lit. f GDPR. With the help of this function, we can better analyze our pages and adapt them to the needs and interests of our visitors.

19. Content Delivery Networks

We use Content Delivery Networks (CDNs) from external providers to optimize loading times and protect our website from misuse. Technical data (in particular IP address, operating system, and browser information) is stored in server log files. Insofar as providers are located outside the EU/EEA, data transfer takes place on the basis of appropriate safeguards pursuant to Art. 46 GDPR.

Prevailing language:

In the event of any conflict or difference in interpretation between the different language versions of these Terms and Conditions, the German version shall prevail.