

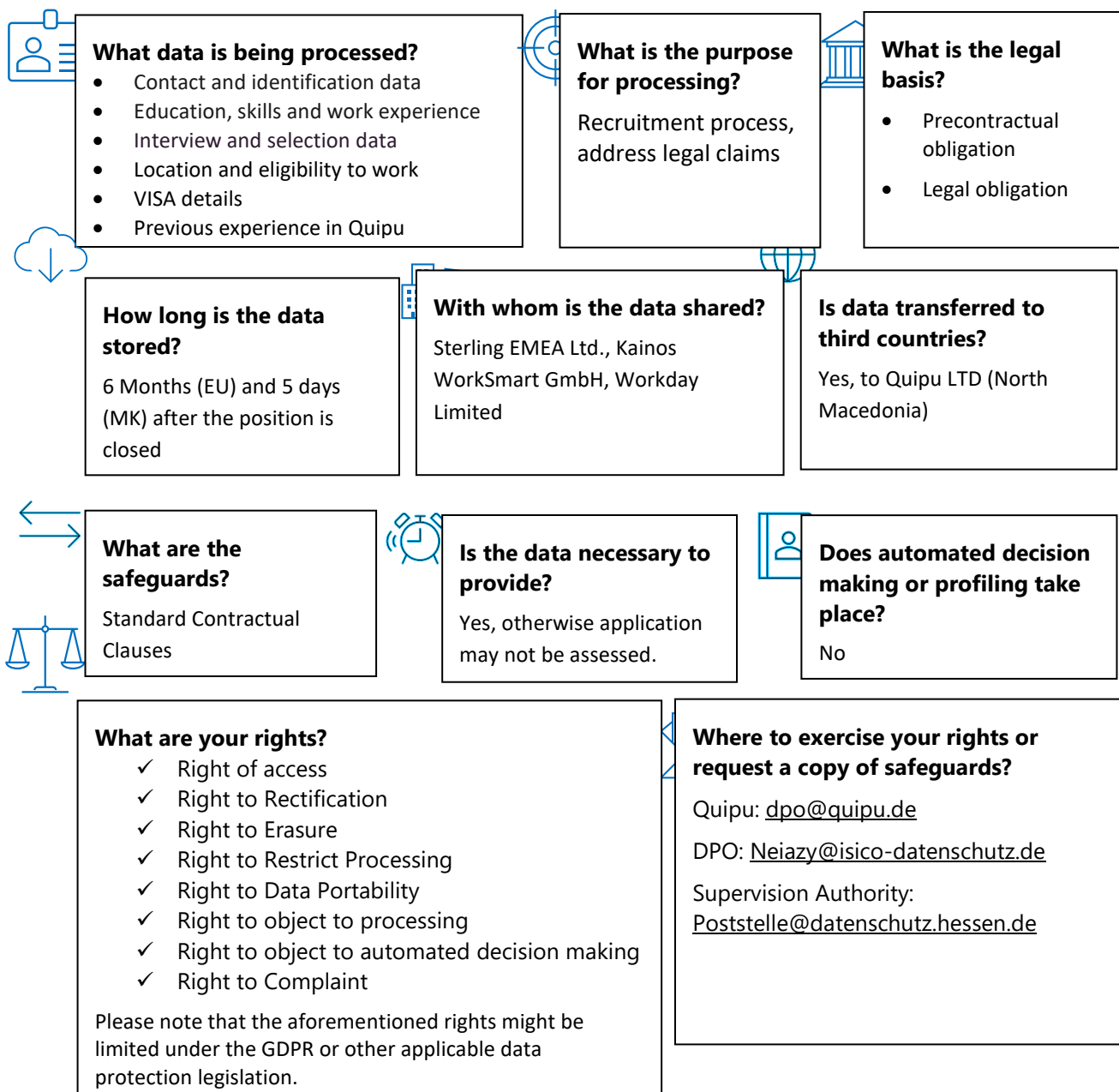
PRIVACY POLICY FOR JOB APPLICANTS

Last Updated: April 2025

Data Controller: Quipu GmbH, Königsberger Straße 1, 60487 Frankfurt am Main

This Privacy Policy applies to your information and personal data that may be collected during the recruitment process when you apply for a specific job position within Quipu. We encourage you to read it carefully. For the full policy, please refer to the following pages.

Overview





Who is responsible for data processing?

The controller within the scope of the General Data Protection Regulation (“GDPR”) is:

Quipu GmbH, Königsberger Str. 1, 60487 Frankfurt, Germany, web page: <https://www.quipu.de/>

Data protection officer: Jacqueline Neiazy, ISICO Datenschutz GmbH, Am Hamburger Bahnhof 4, 10557 Berlin, email: Neiazy@isico-datenschutz.de, web page: <https://www.isico-datenschutz.de/>

For any questions regarding the protection of your personal data, please contact: dpo@quipu.de

What personal data will be processed?

Personal data that may be collected by us during the recruitment process may include:

- Contract and identification details such as email address, phone number, name, and other details;
- Academic studies, relevant work experience, foreign languages, diplomas, licenses (e.g., driving license), qualifications, skills, talents and current location.
- Other personal details provided in your CV and/or cover letter;
- Information from your LinkedIn profile (if referenced in your CV or application);
- Information from job interviews and selection procedures e.g., notes from job interviews, communication records (e.g., email content), and participation in selection procedures;
- Details about your current job, desired job, salary expectations, and employment preferences;
- Potential criminal background by the submittance of a Certificate of Good Conduct, depending on the position you apply for.
- If you are applying from outside the EU: details regarding VISA, eligibility to work.

For what purpose will personal data be processed?

We process your personal data, to the extent permitted by applicable law, for the recruitment process. More specifically, we process your personal data to:

- Assess how your skills and qualifications align with the employment requirements at Quipu and determine your suitability for the specific job you are applying for;
- Consider any objections raised regarding the decision not to proceed with recruitment;
- Engage in communication with you regarding the recruitment process and your application(s);
- Ensure compliance with relevant laws and regulations and safeguard the company’s legitimate interests (such as defending against legal claims) during legal proceedings.
- Verify your educational, employment or criminal history, depending on the position you apply for.

If you successfully complete the recruitment process, you will be informed about the Privacy Policy that is applicable to Quipu Employees. This policy outlines the lawful basis for processing personal data during your employment.

What is the legal basis for the processing of personal data?

We process your personal data on the basis of the precontractual obligation pursuant to Art. 6 para. 1 lit. b. GDPR (Art. 88 para. 1 GDPR in conjunction with § 26 para. 1 sentence 1 BDSG) to assess your application in the context of the employment relationship or during the period prior to the conclusion of the employment relationship.

Additionally, we need to process data to ensure we comply with our legal obligations (Art. 6 para. 1 lit. c. GDPR) in accordance with § 21 section 5 of the German General Equal Treatment Act (AGG) or, in some cases, to address legal claims.

For how long is personal data processed/stored?

We retain your personal data only for the necessary duration during the application process and a reasonable subsequent period, as required by applicable law. This includes purposes such as defending against claims related to the application process or complying with data retention obligations under relevant laws.

More specifically:



- After closing the recruitment for the position you applied for, we retain the necessary personal information for six (6) months if you are applying for a position in the European Union. The retention period is 2 months according to § 21 section 5 of the German General Equal Treatment Act (AGG), along with a justifiable processing and posting period.
- If you are applying for a position in North Macedonia, we retain your information for 5 days after the position has closed.
- If Certificates of Good Conduct are presented by the candidate, no copies are made and stored. The submission will be documented with a corresponding note. If an employment relationship is not established, all information on criminal background is completely deleted.
- If a judicial or disciplinary action arises, your personal data may be stored until the conclusion of such action, including any appeal periods, and will then be deleted or archived in accordance with applicable law.

Upon successful application, we store your personal data during subsequent employment, adhering to relevant legal regulations. Detailed information can be found in the Privacy Policy that is applicable to Quipu Employees.

With whom is the data shared?

Your personal data is shared internally within Quipu, between its various departments in the process of selecting candidates for employment with us. This internal disclosure is done in a secure manner and "on a need-to-know basis".

We have engaged Sterling EMEA Ltd. to conduct background screening services. The operating company for Sterling is Sterling EMA BV, registered at Weesperstraat 61, 1018VN, Amsterdam. Sterling's services include verification of education or employment history. For this purpose, your first name, last name, E-mail address and country of residence will be shared with Sterling pursuant to Art. 6 para. 1 lit. b. Sterling, on behalf of Quipu, may request additional information and may share your personal information with third parties to validate its accuracy, based on your prior explicit consent pursuant to Art. 6 para. 1 lib a. Information about how Sterling may share your personal information can be found [here](#).

We use Workday, Workday Limited, May Lane, Dublin 7, Ireland, as our HR system, and by default, the data you provide during your application will be stored in the EU. Quipu has the appropriate data processing agreements in place with Workday to ensure the security and confidentiality of your data. Additionally, Kainos, operating under Kainos WorkSmart GmbH, Hahnstraße 70, 60528, Frankfurt am Main, Germany, is responsible for implementing and maintaining our HR system.

Is data transferred to third countries?

Your personal information is transferred outside the European Economic Area to Quipu LTD in the Republic of North Macedonia. We have implemented security measures and established adequate legal protections for personal data in this third country. These measures include entering into appropriate data transfer agreement based on Standard Contractual Clauses approved by the European Commission (as referenced in Article 46 of the GDPR) with Quipu LTD. To request a copy of these safeguards, please email us at dpo@quipu.de.

Is the data necessary to provide?

While providing personal data is voluntary, it is essential for us to evaluate your suitability for employment or to fulfil contractual obligations. Failure to provide necessary data may impact our ability to assess your job application effectively, potentially leading to rejection.

What are your basic rights?

According to the GDPR, you are entitled to various rights of which we inform you below:

- Right to access personal data concerning you at any time (Art. 15 GDPR);
- Right to rectify, erase or restrict processing of personal data (restriction of processing) (Art. 16 to 18 GDPR); Please be aware that the right of erasure is not absolute. There are situations in which you may not be able to exercise this right, and there may be instances where we decline to comply with your



request. For example, if processing your data is necessary to fulfil a legal obligation or defend our legal claims, erasure may not be feasible;

- Right to have your data made available to you in a machine-readable format (Art. 20);
- Right to object (Art. 21 GDPR); however, please note that there might be no right to object in certain cases. For instance, if processing your personal data is essential for pre-contractual measures or the performance of an existing contract;
- Right to object to fully automated decision making incl. profiling (Art. 22 GDPR);
- Right to lodge a complaint with the responsible supervisory (Art. 77 GDPR).

In order to exercise any of the above rights or for any questions regarding this policy and our privacy practices, you can send an email to us at dpo@quipu.de.

Der Hessische Datenschutzbeauftragte

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