

## PRIVACY POLICY FOR THE XING COMPANY PROFILE OF COMMSOLID

The protection of your personal data is a special concern to us, Commsolid GmbH, Am Waldschlösschen 1, 01099 Dresden, Germany (hereinafter referred to as “we”, “us” or “our”). We operate the Commsolid Company Profile („Profile“) on the portal Xing, a platform operated by XING SE, Dammtorstraße 30, 20354 Hamburg, Germany („Xing“). We keep confidential your personal data transmitted by you in the context of using our Profile and process it in accordance with data protection regulations, in particular the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016; “GDPR”) as well as this Privacy Policy. We use the Profile to inform about our company and to get into contact with potential employees.

### 1. Data Controller

Data controller for the Profile pursuant to Article 4 no. 7 GDPR is  
Commsolid GmbH, Am Waldschlösschen 1, 01099 Dresden, Germany,  
telephone: +49 351 219 48 800,  
e-mail: [datenschutzbeauftragter@commsolid.com](mailto:datenschutzbeauftragter@commsolid.com).

### 2. Data Protection Officer

Our data protection officer can be reached at  
e-mail: [datenschutzbeauftragter@commsolid.com](mailto:datenschutzbeauftragter@commsolid.com).

### 3. Processing of your Data when Using our Profile

- 3.1 Users have the opportunity to contact us via our Profile. We process the available profile data of the users (such as job title, company name, industrial sector, education, contact details, photo) and the content of the message to process the enquiries of the users and respond to their requests.

The legal basis for this processing is the provision of the services users have requested (Art. 6 para. 1 lit. b GDPR).

- 3.2 If a user submits an application to us via Xing, we process the application data (such as name, email address, date of birth, postal address and phone number), the documents provided by the user (such as curriculum vitae, certificates, cover letter, including your personal details and qualification contained therein) as well as information and messages additionally provided by the user (such as desired start date and employment, salary expectations, your termination period or your motivation why you would like to work for us).

We process the data for the purposes of processing the user's application, including the preparation and conduct of job interviews and recruitment tests and the evaluation of the results, and as otherwise necessary within the application process. We contact the user in the course of the application process to inform the user about the status of his/her application or to invite the user to a job interview or recruitment test. During the application process, our HR department will first process the documents. If the user is suitably qualified, the personal data and documents will be forwarded to the responsible specialist relevant department.

The legal basis for the aforementioned processing is Section 26 para. 1 sentence 1 of the German Federal Data Protection Act (*Bundesdatenschutzgesetz*). The processing is necessary for entering into a possible employment relationship.

- 3.3 We may also contact a user if the user's profile raises our interests. In this case, we process the available profile data.

The legal basis is Art. 6 para. 1 lit. f GDPR. We have a legitimate interest to contact other users via Xing.

**As far as the processing is based on our legitimate interest, you have the right to object, on grounds relating to your particular situation, at any time to this kind of processing. To exercise this right you can contact us at any time using the contact details provided in Section 1.**

- 3.4 If a user registers for an event organized by us via our Profile, we process the profile data to enable the participation. The legal basis is Art. 6 para. 1 lit. b GDPR.

- 3.5 Users have the opportunity to recommend, mark as „interesting“ or comment on our posts. We process the data of the user and the respective interaction to process the enquiries of the users and respond to their requests.

The legal basis for this processing is the provision of the services users have requested (Art. 6 para. 1 lit. b GDPR).

#### **4. How Xing Processes your Personal Data**

With each visit of our Profile or with each interaction with our posts, Xing processes personal data. Xing may also place cookies (which are small files downloaded to the users' devices).

We do not and cannot control this data processing. For more information on how and for what purposes Xing processes personal data and the user's rights and options to protect the privacy, please see the Xing Privacy Policy at <https://privacy.xing.com/de/datenschutzerklaerung>. Objection possibilities can be managed at <https://www.xing.com/settings/privacy>.

Please note that Xing may process or transfer user data in respectively to the United States or other countries outside the European Economic Area.

#### **5. Sharing of Personal Data with Third Parties**

We may disclose your data (certificates, curriculum vitae, draft employment contract) in anonymous form to our affiliated group companies (throughout Europe and worldwide).

#### **6. Storage of your Personal Data**

After completion of the application process, your personal data will generally be deleted after six months, unless you have consented that we are allowed to store your data for a longer period and to inform you about suitable job offers in the future (Art. 6 para. 1 lit. a GDPR) or unless longer storage is required or justified by law. If you accept an employment offer from

us, your application documents will be included in the personnel file. In this case, you will find further information in our Privacy Policy for Employees.

## 7. Your Rights under the GDPR

In particular, but without limitation, you may have the following rights under GDPR:

- **Right of access:** At any time, you have the right to obtain confirmation from us as to whether or not we process personal data about you and, if so, you also have the right to obtain access to your personal data stored by us. To exercise this right you can contact us at any time using the contact details provided in Section 1.
- **Right to rectification of your personal data:** If we process personal data about you, we endeavour to ensure by implementing suitable measures that the personal data is accurate and up-to-date for the purposes for which the personal data was collected. If the personal data about you is inaccurate or incomplete, you have the right to obtain the rectification of such data. To exercise this right you can contact us at any time using the contact details provided in Section 1.
- **Right to erasure of personal data or right to restriction of processing:** You may have the right to obtain the erasure of your personal data or the restriction of processing of your personal data. To exercise this right you can contact us at any time using the contact details provided in Section 1.
- **Right to data portability:** You may have the right to receive the personal data concerning you and which you have provided to us in a structured, commonly used and machine-readable format or to transmit those data to another controller. To exercise this right you can contact us at any time using the contact details provided in Section 1.
- **Right to object:** You have the right to object to the processing of your personal data at any time, if we process your personal data for direct marketing purposes or if we process your personal data in order to pursue our legitimate interest and there are grounds relating to your particular situation. To exercise this right you can contact us at any time using the contact details provided in Section 1.

- Right to withdraw a consent: As far as our data processing is based on a consent (pursuant to Art. 6 para. 1 lit. a GDPR), you may withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on the consent before its withdrawal. To exercise this right you can contact us at any time using the contact details provided in Section 1.
- Right to lodge a complaint with supervisory authority: You have the right to lodge a complaint with a data protection supervisory authority located in the European Union.

## **8. Amendments to this Privacy Policy**

We reserve the right to change this Privacy Policy in accordance with updates of our Profile. Please visit the Profile regularly and check our current Privacy Policy.

This Privacy Policy was last updated on 28.04.2020.