

## **Information on data protection in the application process and in the employment relationship (Art. 13, 14 GDPR)**

The protection of your personal data is important to us. According to the EU General Data Protection Regulation (GDPR), we are committed to informing you about the purposes for which we collect, store, or share data, as well as the rights you have in this regard.

Controller: GRIPS Energy GmbH, Ella-Barowsky-Str. 11, 10829 Berlin, Tel.: +49 305770067-0, [privacy@grips-energy.com](mailto:privacy@grips-energy.com)

Data protection officer: The data protection officer, GRIPS Energy GmbH, Ella-Barowsky-Str. 11, 10829 Berlin, [privacy@grips-energy.com](mailto:privacy@grips-energy.com)

### **Purpose of data processing and legal basis**

Data processing is necessary to enable the initiation or conclusion and performance of an employment relationship between you and our enterprise and to fulfill the relevant obligations (Art. 88 GDPR in conjunction with Section 26 para. 1 of the German Data Protection Act (BDSG), Art. 6 (1)(b)(c) of the GDPR). In addition, for example, if you agree to be included in our applicant pool, processing may also take place based on your consent (Art. 6(1)(a) of the GDPR).

In the context of business and compliance processes and for the defence against claims of all kinds arising from the employment relationship or pre-contractual facts, processing may be carried out based on a legitimate interest, if the interests or fundamental rights and freedoms of the data subject, do not prevail (Art. 6(1)(f) of the GDPR).

If the information necessary for the relevant case is not provided, your application cannot be processed, no employment relationship can be created or no employment relationship can commence.

### **Recipients of your data**

We will transmit your personal data only if this is permitted by law. Recipients of your personal data may be the Employment Agency or another measure provider with which you are registered, offices and authorities, pension insurance and social security institutions, tax authorities, courts, occupational pension institutions, offices for the processing of company pension plans as well as asset-related benefits, third-party debtors in the event of wage and salary garnishments, tax consultants, payroll offices as well as Processors.

The transfer is made for the following purposes:

- Payroll accounting for wages and other (salary) claims,
- Review;
- Processing of funding programs; and
- The fulfillment of legal commitments.

In individual cases, data is transferred to other authorised recipients.

The controller is a subsidiary of econnext AG, which as a holding company comprising of a group of enterprises (<https://econnext.eu/#portfolio>). If you have agreed to be included in the group-wide applicant pool, your application documents will be shared with the enterprises of the holding company.

Data transmitted as part of your application will be transferred using TLS encryption and stored in a database. The operator of this database is a company called Personio GmbH and it offers a human resource and applicant management software solution for businesses (<https://www.personio.com/impressum/>).

Therefore, under Art. 28 of the GDPR, Personio is our processor. In this case, the processing is based on an agreement for the processing of orders between us as the controller and Personio. Data may be transferred to third countries based on standard contractual clauses for processing. You can request further information on this free of charge.

### **Storage of your data**

Your personal data is deleted as soon as its purpose is no longer applicable and there is no obligation to retain it. This retention period complies with the legal requirements. Unless employment is granted or you have consented to the continued storage of your data, your data will be erased no later than 6 months after the end of the application process. You may wish to have your data anonymised instead of deleted. In this case, only so-called metadata without any personal reference remains for statistical analysis (e.g. share of male and/or female applicants, number of applications per specified period of time etc.).

### **Your rights**

You have the right to obtain access to your personal data. You can also request rectification of inaccurate data and under certain conditions, you have the right to have the data erased and restrict the data processing. Finally, you have the right to data portability.

If the processing of your data is based on your consent, you have the right to withdraw consent for future processing. This does not affect the legality of the processing carried out based on the consent until revocation. ***If the legal requirements according to Art. 21(1) and (2) of the GDPR are met, you have the right to object to the processing of your data.*** You also have the right to lodge a complaint with a data protection supervisory authority. We do not use profiling or automatic decision-making.

This Policy is dated 07.02.2024