

# Personal data processing information for applicants

V2.0 e Global

October 13, 2025

## Introduction

These Personal Data Processing Information (“**Information**”) are for the information of applicants in regard to processing in the frame of the application process.

We may process personal data on other occasions, such as our website, the career site or when conducting business with you. In these cases, we will provide you with separate data protection information.

If you read this Information, you are about to send your personal data to a member company of the Exyte Group as an applicant for a position at the Exyte Group, make an account on our career site without application (e.g. for getting information about suitable jobs) or register yourself for our talent pool. If you do not know who we are yet, you will find some useful information on our website [www.exyte.net](http://www.exyte.net).

With these Information we would like to inform you about how we process personal data (“**Personal Data**”) which you transferred to Exyte, which rights you have as data subject, and provide you with other helpful material about data processing.

Please note that these Information do not constitute a contract or an offer for a contract but are for your information only.

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## 1. Applicability of these Information and Controller

Firstly, you will want to know who you are actually sending your personal data to and who is processing your personal data as “**controller**” – the entity determining the purpose and means about processing your personal data.

As you may already have seen on our website, Exyte is a company group with many members. You can find a list of all our locations and group members under this [link](#).

This Information is for your application process at European Exyte entities. If you are applying at another country outside the European Economic Area, we may have specific data protection information for this country, which you can find under this [link](#).

If you apply at a European entity the controller of your Personal Data will be the entity you apply to for a position at Exyte. You can find the contact data of the responsible person for the position you apply for on our career page at the respective job (you will find all entities in the Exyte Group under the following [link](#)).

If you are applying to an entity outside of the European Union, the company operating this website – Exyte Management GmbH in Germany – is only forwarding your information to such entity. Please be aware that your data may not be subject to the laws of the European Union if you are applying to an entity outside the European Union and some countries may have a lower or different standard of data protection. You will find information about other entities data processing activities in accordance with the applicable law under this [link](#).

Following we refer to the controller as “**Exyte**”, “**we**” or “**us**”.

## 2. Data Protection Officer

We have appointed a Data Protection Officer (“**DPO**”). You can reach the DPO under the following email address: [privacy@exyte.net](mailto:privacy@exyte.net).

Please feel free to contact the DPO in case of any questions, complaints, inquiries or suggestions regarding processing Personal Data at any Exyte entity.

## 3. Personal Data we process and sources of Personal Data

Please note that in general you are not obligated to provide any Personal Data to us. However, if you do not provide Personal Data to us, we may not be able to process or consider your application or we may miss important information, which could be to your disadvantage.

In general, we collect personal data directly from you. In this regard, we process all Personal Data you provide to us per communication, in the forms you fill out or documents you upload, such as your CV, motivation letter, certificates and diplomas, photos and others.

Furthermore, we collect personal data when you interact with our systems, the chatbot or the career website. These personal data are connected to your account or your application. You will find information on which data we collect about you on our career website and while interacting with the website and the chatbot [here](#).

Also, we will analyze your application data to assess and profile how you match the desired position. This entails making your application machine readable and having a large language model reading your application. Your personal data is not used to train a large language model. If we use data for training, they are anonymized.

In addition, we may collect and process information about you which you made public on the internet or on social networks (such as LinkedIn).

Please note that we may also collect other personal data about you, depending on the way you interact with us, e.g., via a linked-in application. For these purposes we provide specific data protection declarations or additional information.

As part of our employment process, we also ensure that you are not listed on a sanctioned person list. We receive such lists from the institutions which issue the sanctions and will confirm that you are not listed.

For the purpose of the application, we usually process the following Personal Data about you, however, if you provide additional data, we may also process such additional Personal Data:

- Name, work and contact details as well as address;
- Date of birth and place of birth;
- National Identifier (e.g. ID Card No; Passport No etc.);
- Nationality, citizenship, resident status, work permit;
- Whether you attended military or civil service;
- Your previous employers;
- Your reporting and management relationships, as provided by you;
- Training, education, academic background and certificates;
- Languages you speak;
- Other information on your CV;
- Details about how you intend to work at Exyte (e.g. full time, part time, home office);
- Your career plans;
- Your training and education plans;
- Your past and expected remuneration;
- Your past and expected job position
- Your address and current location (City or city quarter level via IP)
- Phone number
- WhatsApp account
- Your desired work location
- A profile of you, on how you fit with your desired position and based on your consent, with other positions

- Other jobs, which attracted your attention at the Exyte Group
- Video Recordings you sent to us
- Video recordings we made of our interview, whereas we will inform you in advance and request your consent.
- Videos you sent to us as application
- Status of your application
- Status in relation to other applications
- Content of your interview / Transcription
- Time it took you to confirm the interview
- Canceled interviews
- Time track through the application process
- Expenses (e.g. travel expenses for your travel to an interview);
- Assessment test results (e.g. in case you attended an assessment center or conducted a test, OPQ);
- Photos (including meta data contained in the photo);
- Bank data;
- Gender (m/w/d) and how you wish us to address you;
- Marital status;
- Appointments and free time
- Profile assembled from data matched to the job description
- Details you provided to us in relation to our codes of conduct (possible conflict of interests, accounts, trade body relationships),
- Whether you are listed on a sanctioned list
- In rare cases: Personality profiles. However, we will inform you separately in such cases;
- In rare cases, if you apply to sensitive areas, we may process your criminal record or financial status. We will discuss this matter with you before we obtain such information.

Usually, we process the following special categories personal data for the application process:

- Health information (e.g. disabilities);
- Religion;
- Special categories of data you may provide to us in relation to our code of conduct.

Please note that we might not collect all the information above for each application or may require additional information during the application process for specific countries or special positions. We will ask for such information and inform you accordingly.

If your application is successful, we will process several of the Personal Data you provided during the application process for implementing our labor relationship. We will provide you with separate data protection information as well.

#### **4. Purpose of processing Personal Data**

We process personal data as listed in No 3 of this Information for the following purposes:

- a. Processing the application for employment including considering other suitable positions for you within the Exyte Group;
- b. Creating a candidate profile for you and assessing and evaluating the profile for deciding whether you are suitable for this job;
- c. Determining whether you are a matching candidate for the position at Exyte respectively which applicant to choose or with your consent with other positions;
- d. Creating and maintaining employment records;
- e. To improve our services and performance, including the efficiency of the process;
- f. Analysis of the effectiveness and improvement of campaigns, website design, user experience and job description;
- g. Which jobs you are interested in, how long which state took and time tracking during the processing are processed in order to create aggregated statistics about our application process.
- h. To organize our application process efficiently;
- i. To ensure that you are not listed as a sanctioned person;
- j. To inform you about other suitable positions for you at the Exyte group;
- k. To contact you to obtain your consent for keeping you in our talent pool for future possible positions for you;
- l. To investigate or assess breaches of laws or our code of conduct;
- m. To process your application, evaluation, assessment and initiate or implement an employment relationship;
- n. Other processing activities as indicated in our communication with you or on forms you fill out;
- o. Based on your consent we will use your contact data to advertise suitable positions in the Exyte Group for you.

If your application was successful, we will process several of the Personal Data you provided during the application process for implementing our labor relationship. We will provide you with separate data protection information for the labor relationship.

## 5. Legal basis

We are processing your Personal Data generally based on the following legal basis:

- General legal basis

We are processing your Personal Data based on Art. 6 Sect I lit b General Data Protection Regulation (“**GDPR**”; EU Regulation 679/2016), i.e. for pre contractual measures. If you are applying at a German entity in addition we are processing your Personal Data based on on Art. 6 Sect I lit b General Data Protection Regulation and if applicable on Art 88 Sect I GDPR i.c.w § 26 Sect. I Federal Data Protection Act (Bundes Datenschutz Gesetz, “**BDSG**”).

Otherwise we are processing personal data based on our legitimate interests Art 6 Sect I Lit f GDPR, whereas our legitimate interests are to identify the most suitable candidate for a position and to avoid unsuitable or unqualified candidates as well as discrimination of any kind and to organize an efficient application process, measure the effectiveness of campaigns, find the best person for the position, receive a detailed picture of the candidate, ensure that you and we are complying with the laws and effectively organize our application process.

Furthermore, it is our legitimate interest to understand how effective our advertisement and our job descriptions are and how we can improve the attraction of jobs at Exyte.

- **Special category of Personal Data**

For special categories of Personal Data for which processing is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment and social security and social protection law the legal basis is Art. 9 Sect II lit. b) GDPR or if applicable in case of a German entity i.c.w. Art. 26 Sect. 3 BDSG.

For other special categories of Personal Data, we process based on your consent according to Art. 9 Sect 2 Lit a) GDPR. We will ask you for your consent when processing such additional special categories of Personal Data. In addition, we may process special categories of Personal Data based on Art 9 Sect 2 Lit f) for the defense from or assertion of legal claims.

## **6. Consent**

In case we are processing your personal data based on your consent, you may revoke your consent at any time, in which case we will stop processing your Personal Data. Processing of Personal Data until your revocation of consent remains legal.

The easiest way to revoke your consent is by specifying in an email, which consent you wish to revoke and send it to [TalentAcquisition@exyte.net](mailto:TalentAcquisition@exyte.net) and identify yourself accordingly.

## **7. Transfer of Personal Data**

We may transfer Personal Data between Exyte affiliates within the Exyte Group.

Generally the Exyte Group entity you apply at will process to Personal Data, however other Group member companies may access your personal data in the frame of the Group organization, especially the Exyte Management GmbH, if required to process your Personal Data for the purposes as listed above, but also other Group entities in order to provide technical, professional and practical support.

Exyte Management GmbH provides most of the technical and personnel support as a processor.

We may also ask you for your permission to transfer and store personal data in the talent pool at Exyte Management GmbH. However, we will inform you about processing and your consent separately.

We may further transfer your Personal Data to other entities of the Exyte Group in order to consider you for other positions, which your profile might fit for. In addition, we may transfer your Personal Data within the Group, either based on your express consent – e.g. in our talent pool. Also based on our legitimate interest (Art. 6 Sect I, Lit f GDPR) we may share your personal data with other group members for support, whereas it is our legitimate interest to organize our company group efficiently and to find the most suitable candidate for positions within the Exyte Group.

Other Exyte Group Entities or third-party service providers may process your Personal Data as our processors based on our instructions.

All group members are subject to a Data Protection Policy to ensure a constant level of data protection.

Some Exyte Group members and third-party processors may be located outside the European Economic Area (“**EEA**”) in countries for which the European Commission (“**EC**”) did not decide that such countries provide an adequate level of data protection.

All Exyte Group members therefore signed a Data Processing and Joint Controller Agreement (“**DPJCA**”) which includes the standard contractual clauses as approved by the EC to safeguard the processing of Personal Data outside the EEA, i.e. all Exyte Group members are contractually obligated to comply with an adequate data protection level. Also third party processors are subject to the standard contractual clauses, if there are no other safeguards. In most cases external service providers outside the EEA are processing personal data in India or the USA.

Please find a list of all Exyte entities belonging to the Exyte Group under this [link](#).

Besides the transfer within the Exyte Group and to our processors a transfer of Personal Data to third parties takes place in case:

- Transfer with your express permission (Art 6 para. 1 lit a GDPR or Art 9 para 1 GDPR);
- Transfers to third parties to which we are legally obliged, for example to the tax office or other governmental authorities (Art. 6 para 1 c GDPR) or Art. 9 Section 2b GDPR in case of special categories of personal data;
- Transfers to third parties to fulfill our commercial and tax obligations, for example to our tax auditor according to Art. 6 para 1 c GDPR i.c.w. with the respective individual legal obligation if we are legally obliged to transfer such data, or Article 6 para 1 f GDPR if the transfer is not mandatory but required for our legitimate interest to efficiently communicate and proceed with authorities and comply with our obligations;
- In order to assert legal claims, conduct investigation about legal claims or to defend against legal claims we may transfer data to authorities or to lawyers, agents, experts, authorities etc. based on Art. 6 para 1 lit f GDPR, whereas it is our legitimate interest to assert or defend from legal claims. In case of

special categories of Personal Data, we may transfer such data based on Art. 9 para II lit f GDPR to assert or defend against a legal claim.

Please note that a transfer for the above purposes may also be based on another legal basis, where applicable.

Any transfer of data to a third country outside the EU, which is also not a party to the EEA, is subject to requirements in compliance with the GDPR.

Please note that in case you are applying for a position at an Exyte Group Member outside the EEA, the Exyte Management GmbH will transfer your application to such entity. The entity as controller is subject to the laws and regulations applicable for the entity you apply at. Thus, in these cases the local data protection laws apply and not the GDPR.

If you need any further information about transfers or safeguards, you can contact us any time.

## **8. Duration of processing**

We will process your Personal Data for the time only, which is necessary to complete the purpose.

In case your application was not successful we will usually delete or anonymize your Personal Data from the application after six (6) month upon informing you that your application was not successful or receiving notice from you that you do not intend to proceed with the application, unless you have provided us with your consent to keep your application in our talent pool.

In case we process your personal data to assert or defend from a legal claim, we will process your Personal Data as long as necessary for this purpose.

In some cases, or for some personal data, we may have to store your Personal Data longer, e.g. in case of compliance investigations, security logs in our system (usually 1 year) or systematic automated deletion of emails. We may also store your data longer for purposes, such as tax or compliance documentation, e.g. in case we provided you with travel expenses to visit us for an interview as well as if we processed personal data in other occasions, such as visiting our [website](#). On such other occasions we provide you with separate information.

## **9. Profiling and automated decision making**

We do not base decisions which produce legal or similar significant effects to you solely on automated decision making, such as automated profiling.

In some cases, we may assemble profiles on scientific basis to assess indications for specific abilities or attributes for an important position. We will discuss this with you separately as the case may be and will expressly indicate such profiling in advance.

We may classify and organize your data for searchability and classification to match the profile to attributes of the job description and easier match you or search your profile in terms of such criteria. This will involve



parsing, reading your profile via a large language model and comparing them to job descriptions. Final decisions are always made by humans.

## 10. Your rights

Upon request we will inform you whether Exyte processes any Personal Data about you, and if yes which.

If we process your Personal Data in order to advertise, you have the right to object to the processing of your Personal Data for the purpose of advertising at any time. If you object to the processing for purposes of advertising, your Personal Data will no longer be processed for this purpose.

The easiest method to object to advertisement is to send an email to [TalentAcquisition@exyte.net](mailto:TalentAcquisition@exyte.net). However, we accept any other form of objections to advertisement, which allows us to clearly identify you.

Furthermore, you have the right to object against processing of your Personal Data, based on your particular situation, which is processed based on Article 6 para. 1 lit. f GDPR, i.e. legitimate interest, or Art 6 para. 1 lit. e GDPR, i.e. processing based on necessity for the performance of a task carried out in the public interest or in the exercise of official authority vested in Exyte including if we use your personal data for profiling for that purpose. In case you object to processing based on the aforementioned legal basis due to your particular situation, we will only proceed processing if our compelling legitimate grounds to process your data overrides your interest, rights or freedoms to stop processing your Personal Data or for the exercise or defense of legal claims. This also applies to profiling based on the aforementioned.

Under the conditions set out in the GDPR, according to Art. 16 GDPR you also have the right to correct your incorrect or incomplete Personal Data as well as a right to deletion according to Art. 17 GDPR and a right to restrict the processing of your Personal Data under Art. 18 GDPR.

You also have the right to receive from us Personal Data concerning you which you have provided to us, in a structured, commonly used, and machine-readable format (Art 20 GDPR). You have the right to transmit (or have transmitted) the Personal Data to another controller.

If the processing of Personal Data concerning you is based on your consent, you have the right to revoke your consent at any time. The lawfulness of the processing on the basis of the consent until the revocation is not affected.

You also have the right to lodge a complaint with the competent supervisory authority for data protection matters. Unless stated otherwise, the competent authority is the "Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg" in Baden-Württemberg, Germany.

You can always lodge a complaint at the data protection officer or commissioner at the location of the Exyte Group entity you are applying at.