

## Privacy Policy in the Context of Information Obligations for Applicants

Dear applicant,

we are pleased that you are interested in our company and have applied or are applying for a position. In compliance with legal requirements, we would like to provide you with the following information regarding the processing of your personal data in connection with your application.

### 1. Who is responsible for data processing?

MB connect line GmbH is responsible within the meaning of the GDPR.

You can reach us at the following contact options:

Phone: +49 (0) 98 51 / 58 25 29 0

Fax: +49 (0) 98 51 / 58 25 29 99

E-Mail: [info@mbconnectline.com](mailto:info@mbconnectline.com)

You can find further information about our organisation in the imprint of our website:

[www.mbconnectline.com](http://www.mbconnectline.com)

### 2. Who is our data protection officer?

The External Data Protection Officer of MB connect line GmbH is:

a.s.k. Datenschutz e.K. Sascha Kuhrau

Schulstraße 16a

D-91245 Simmelsdorf-Hüttenbach

Phone: +49 / 9155 / 263 99 70

E-Mail: [info@ask-datenschutz.de](mailto:info@ask-datenschutz.de)

Homepage: <https://bdsq-externer-datenschutzbeauftragter.de>

### 3. Which of your data do we process?

We process the data you have sent us in connection with your application in order to assess your suitability for the position (or other open positions in our company, if applicable) and to carry out the application process.

This includes in particular:

- Title,
- First and last name,
- Address,
- Email address,
- (mobile) telephone number,
- country,
- nationality,
- local work permit, and
- personal data contained in the documents you have submitted (cover letter, CV, references, etc.) or provided voluntarily.

### 4. On what legal basis, for what purposes and for how long do we process your data?

The legal basis for the processing of your personal data in this application process is primarily Art. 6 (1) (b) GDPR.

According to this, the processing of data that is necessary in connection with the decision to establish an employment relationship is permissible.

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If the data is required for legal purposes after the application process has been completed, data processing may be carried out on the basis of the requirements of Art. 6 GDPR, in particular for the purposes of legitimate interests pursuant to Art. 6(1)(f) GDPR. Our interest then lies in asserting or defending claims.

If special categories of personal data within the meaning of Art. 9 GDPR are processed (e.g. health data), the legal basis is Section 26 (3) BDSG or Art. 9 (2) lit. b) GDPR in conjunction with Art. 6 (1) lit. b) GDPR.

We will process your application as follows:

**a. Individual application**

- **Purpose of processing:**

When you apply for individual job vacancies, we process your data in order to assess your suitability for the position (or other open positions in our company, if applicable) and to carry out the application process. The provision of application data is necessary for the application process; without this data, we cannot consider your application.

- **Legal basis for processing:**

The data processing described above is carried out in accordance with Art. 6 (1) (b), Art. 88 GDPR in conjunction with § 26 BDSG on the basis of the necessity for the decision on the establishment of an employment relationship.

- **Storage period for processing:**

Your data will be stored for the duration of the application process and for six months from the date on which the vacant position is filled, in accordance with Sections 15(4) AGG, 61b ArbGG and 167 ZPO. Your data will be automatically deleted at the end of this statutory retention period.

**b. Sanctions list check**

- **Purpose of processing:**

In connection with the requirements of our AEO (Authorised Economic Operator) certification, we carry out a sanctions list check on shortlisted applicants. This ensures that we comply with the legal requirements of customs and export control law and maintain our certified security status. Only your full name and address are used for the check. The check is carried out by our customs service provider Customs Support Group (Tool iZD Business Solutions), which acts as a processor in accordance with Art. 28 GDPR. No automated decision-making takes place; any hits are checked and evaluated manually.

- **Legal basis: Art. 6(1)(f) GDPR**

Our legitimate interest lies in complying with export control and customs requirements and maintaining AEO certification. When weighing up the interests, it was taken into account that the check is only carried out on shortlisted applicants, that only the name and address are used and that the processing is therefore limited to the necessary extent. An unreasonable impairment of your rights and freedoms is therefore not to be expected.

- **Storage period for processing:**

Your data will be stored for the duration of the application process and for six months from the date on which the vacant position is filled, in accordance with Sections 15(4) AGG, 61b ArbGG and 167 ZPO. Your data will be automatically deleted at the end of this statutory retention period.

**c. Online research**

- **Purpose of processing:**

As part of the application process, we may also consider publicly available, work-related information in individual cases – for example, from professional networks such as XING or LinkedIn or from other professionally relevant online sources. The aim is to obtain as complete and objective a picture as possible of your professional qualifications and suitability.

We expressly ensure that the data comes from publicly accessible, work-related sources and do not evaluate any private or non-work-related content – even if it is publicly available. Automated decision-making within the meaning of Art. 22 GDPR does not take place.

- **Legal basis: Art. 6(1)(f) GDPR**

Our legitimate interest lies in careful, transparent and appropriate personnel selection. When weighing up the interests, we took into account that the research is limited exclusively to job-related, publicly available information and therefore does not constitute an unreasonable intrusion into the privacy of the applicants.

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- **Storage period for processing:**  
Your data will be stored for the duration of the application process and for six months from the date on which the vacant position is filled, in accordance with Sections 15(4) AGG, 61b ArbGG and 167 ZPO. Your data will be automatically deleted at the end of this statutory retention period.

**5. To whom do we pass on your data?**

Within MB connect line GmbH, your data will be shared with those departments (e.g. human resources, relevant managers, specialist departments) that are needed to fulfil our contractual and legal obligations. We also use certain service providers and/or third-party providers to fulfil our contractual and legal obligations. These include: Microsoft 365, iZD Business Solutions from Customs Support Group

**6. Is data transferred to a third country or an international organisation?**

In general, the processing of your data takes place within the European Economic Area (EEA). Under certain circumstances, your data may be transferred to a country outside the EEA.

The transfer of data within the company is secured by an intercompany agreement.

The transfer of data to service providers and/or third-party providers who may process your data in a country outside the EEA takes place on the basis of a so-called adequacy decision of the EU Commission in accordance with Art. 45 GDPR or on the basis of the EU standard contractual clauses in accordance with Art. 46 GDPR to ensure an adequate level of data protection with regard to the processing of your data.

**7. What rights do I have as a data subject?**

As a data subject, you have the following rights

- Right to information in accordance with Art. 15 GDPR,
- Right to rectification in accordance with Art. 16 GDPR,
- Right to erasure in accordance with Art. 17 GDPR,
- Right to restriction of processing in accordance with Art. 18 GDPR,
- Right to data portability in accordance with Art. 20 GDPR,
- Right to withdraw your consent in accordance with Art. 7 para. 3 GDPR,
- Right to object pursuant to Art. 21 GDPR, and
- Right to lodge a complaint with a supervisory authority pursuant to Art. 77 GDPR.

**8. Right to lodge a complaint**

You have the right to lodge a complaint with a data protection supervisory authority regarding our processing of personal data.

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## Dokument history

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2018-05-24	01	Creation of the document	JETA
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2024-11-12	03	Update company name, remove applicant management portal recruitee	BEMU
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