

# Annex 1 to the processing contract in accordance with Article 28 of the General Data Protection Regulation

## Processing Specification

### 1. Subject of the processing:

The subject of this agreement is the processing of personal data by the recruitment and applicant management software, including the booked product components and any kind of ancillary processing, processed on the client's behalf.

### 2. Processing type:

"Processing" is defined as in Article 4 No. 2 of the General Data Protection Regulation. This means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 3. Processing purposes and specification:

The main purposes of processing are recruitment and applicant management, including:

- Structured collection of applicant data
- Structured presentation of applicant data
- Communication with applicants, recruiters and HR managers
- Implementation and communication of and with third parties and cooperation partners
- Assessment of applicant data as part of reports
- Providing a talent pool
- Retrieving feedback for applicants and employees hired via the software

## Data Subject Categories

Data of the following groups of persons will be processed on behalf of the client:

- Applicants of the client
- Recruiters, employees and HR managers of the client
- Job seekers and prospective applicants

## Personal Data Categories

The following categories of personal data of applicants may be affected:

- Personal details:  
Title, academic degree, first name, last name, nationality, date of birth, etc.
- Contact and address details:  
Street, house number, ZIP code, city, country, state, telephone number, fax number, email address, etc.
- Application data:  
Application image, letter, CV, work experience/reports, (higher education) reports and other qualifications, driver's license, willingness to travel, etc.
- Account and protocol data:  
Applicant account, username, IP address, logfiles
- Usage data, if personal:

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Email content, invitations, feedback, evaluations, etc.

- Special categories of personal data within the meaning of Article 9 of the General Data Protection Regulation:

If disclosed/consented, identification possible or necessary for other objective reasons: Ethnic origin, political opinions/party affiliation, trade union membership, religious or philosophical beliefs, genetic/biometric data (e.g., application image), data concerning health (e.g., about a pregnancy, disability or health-based restrictions), sexual orientation (e.g., sex/gender, homosexuality), etc.

The following categories of personal data of recruiters, employees and HR managers may be affected:

- Personal details:  
Title, academic degree, first name, last name, functional level, company, etc.
- Contact details and address data:  
Registered office, telephone number, fax, email address, etc.
- Account and protocol data:  
Username, IP address, logfiles, role, protocols of processing within the system, etc.
- Usage data:  
Comments, email content, invitations, feedbacks, evaluations, etc.

### Data Processing Locations

Data will be processed on behalf of the client at the following locations:

#### **softgarden e-recruiting GmbH (Contractor's offices)**

Berlin office: Tauentzienstraße 14, 10789 Berlin, Germany

Saarbrücken office: Europaallee 29, 66113 Saarbrücken, Germany

#### **myLoc managed IT AG Am Gatherhof 44 40472 Düsseldorf Germany (Data Center)**

Service provider's locations: Am Gatherhof 44, 40472 Düsseldorf, Germany; In der Steele, 40599 Düsseldorf, Germany

#### **PlusServer GmbH Welsersstraße 14 51149 Cologne Germany (Data Center)**

Service provider's locations: In der Steele, 40599 Düsseldorf, Germany; Welsestraße 14, 51149 Cologne, Germany

### Contractor's Persons Authorized to Receive Instructions

The contractor authorized the following persons to receive instructions from the client:

Team Customer Service: [support@softgarden.de](mailto:support@softgarden.de)

### Contractor's Data Protection Officer

The contractor's data protection officer is:

Marco Tessendorf, procado Consulting, IT- & Medienservice GmbH, Warschauer Str. 58a, 10243 Berlin, Germany

Contact details: [edsb@procado.de](mailto:edsb@procado.de)

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### Commissioned Subcontractors

Use of subcontractors or optional and/or free services will normally be confirmed by the recruitment system via a so-called “opt-in” procedure of the user. To not make software availability dependent on third-party services, the contractor will also offer to implement third-party services, which may especially be booked via the client’s *Marketplace* and—if possible—individually, on the system for the client.

Subcontractor's Name and Address	Order Contents
myLoc managed IT AG Am Gatherhof 44 40472 Düsseldorf Germany	Colocation and managed services  Rack rental and providing of: <ul style="list-style-type: none"> <li>• Redundant firewalls and load balancers</li> <li>• Redundant power supply via emergency power generator, USP (n+1 redundancy) and A/B supply to server racks</li> <li>• Multiple redundant IP connections and redundant network infrastructure</li> <li>• Separate backup and administration networks</li> <li>• Redundant, energy-efficient cooling (n+1 redundancy)</li> <li>• Dedicated servers</li> <li>• SSL certificates</li> <li>• Replacement of defective server hardware</li> <li>• Other support services for all server systems (e.g., as part of proactive monitoring)</li> </ul>
PlusServer GmbH Welserstraße 14 51149 Cologne Germany	
Textkernel B.V. Nieuwendammerkade 26a5 NL-1022 AB Amsterdam (Service Location Germany)	CV-Parsing (optional) <ul style="list-style-type: none"> <li>• Converting résumé data into profiles / records</li> <li>• Use of AI for comparison (linking of job / applicant profiles in the client)</li> <li>• Maintenance and support services</li> </ul>
Cronofy Ltd 9A Beck Street, Nottingham, NG1 1EQ, UK (Service Location Germany)	Calendar integration (optional) <ul style="list-style-type: none"> <li>• Meetings, Appointments and Tasks</li> <li>• Processing of calendar structures &amp; events</li> </ul>