

Job Candidates Data Protection Statement

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Thinkproject Job Candidates Data Protection Statement

Who are we? Who are you?

Thinkproject operates globally and process personal data in accordance with applicable data protection laws in the jurisdictions in which it operates.

In this Job Candidates Data Protection Statement, Thinkproject, “we”, “us” or “our” refers to the Thinkproject group entity (or entities) responsible for processing your personal data in the context of your job application.

“You” or “your” refers to you as an individual applying for a role with Thinkproject.

What is this Job Candidates Data Protection Statement about?

This **Job Candidates Data Protection Statement** explains how and why we use your personal data:

- when you apply for a job at Thinkproject
- when we proactively identify and look for potential candidates that will be a good fit for a role within Thinkproject, and we will refer to this activity as our **recruitment process** in this **Job Candidates Data Protection Statement**.

This **Job Candidates Data Protection Statement** is reviewed regularly to ensure it remains accurate, and it reflects how and why we use your personal data, as well as to reflect any changes in applicable laws. Where changes are substantial, we will take appropriate steps to inform you. It’s important to check out this **Job Candidate Data Protection Statement** regularly along with any updates and other data protection or fair processing information we may provide to you during the recruitment process, so that you are fully aware of how and why we are using your personal data.

How can you get in touch with us?

If you have any questions or concerns about this **Job Candidates Data Protection Statement**, please contact us first, so that we can investigate and resolve them, based on your preference as follows:

- by email: privacy@thinkproject.com
- by post: Group Data Protection Officer at Gisela-Stein-Strasse 681671 Munich, Germany.

If you feel, despite our commitment and efforts, that you still have concerns, you may have the right to lodge a complaint with a competent Data Protection Authority, in the country in which you live, work or you believe a breach of applicable data protection laws has occurred.

Who is the Controller?

The controller is the Thinkproject group company that advertises the role, receives your application, or considers you for employment, and this is usually the company identified in the relevant job posting or recruitment communication.

A list of Thinkproject group companies and their contact details is available here: [Imprint | Thinkproject](#)

Your personal data

Personal data means any information that can identify you, either on its own or when combined with other information. Depending on the context of the recruitment process, this may include:

- **special category data** about your racial or ethnic background, political views, religious or philosophical beliefs, trade union membership, physical or mental health information, biometric data used for identification purposes, genetic data and/or sexual life or orientation that is used to uniquely identify you.
- **pseudonymised data** where your data is obscured so that you are not easily identified during processing, without additional information.
- **criminal offence data**, where permitted by applicable law, such as information obtained through background or screening checks, including criminal convictions, offences, or confirmation of the absence of such records.

Data Processing

“Processing” means anything we do to your data including collecting, organising, recording, storing, disclosing, erasure whether carried out manually or by automation, as well as any transmission of or remote access to your data.

Data Protection Laws

“Data Protection Laws” means the laws and regulations applicable in the jurisdictions where we process your personal data, which govern how and when such data may be processed. For certain types of personal data, such as special categories of personal data or criminal offence data, additional legal requirements may apply.

This could be:

- your explicit consent
- us exercising our legal obligations
- reasons of substantial public interest (for example, public health considerations)
- us defending or exercising legal claims.

How do you share your personal data with us and how do we process it?

Sharing your data with us is entirely voluntary, except where required by applicable law or Thinkproject policies. If you choose not to share your data, there will be no negative repercussions, however, please be aware that not sharing it with us may restrict our ability to fulfil certain objectives outlined in this **Job Candidates Data Protection Statement**. You may also find that access to certain systems that require your data for entry may be unavailable to you. If you share personal data about someone else (such as your current or past employer for us to obtain references), you should ensure that they are aware that you are doing so, so that they can respond accordingly should we contact them, and that they have consented to you sharing their data with us.

How and why do we use your personal data during our recruitment process?

We process your personal data as part of our recruitment process when you apply for a role with Thinkproject and, if your application is successful, during the subsequent hiring process. In certain circumstances, if you are not successful in your application, we may continue to process your personal data as outlined in the **Table** below.

We will collect your personal data from you, and third parties such as our service providers, and organizations we use for our recruitment process, as listed below.

This **Table** shows how we use your personal data.

	Stages of processing	Categories of your personal data processed and reasons for processing	Legal bases for processing your personal data
(a)	<p>Measures taken to assess your personal data and determine your suitability for the role</p>	<p>If you apply for a role via our website or through our recruitment service providers, we process the following categories of personal data:</p> <ul style="list-style-type: none"> • Personal details such as your name, title, preferred pronouns, salary expectations, photo (where you choose to provide one) • Contact details such as your home address, email and phone number • Professional information included in your CV and/or cover letter; a completed application form; your work history, qualifications, certificates, professional memberships; education • Availability for interviews; testing; potential start date; salary expectations <p>If you progress to the interview stage and/or where the role requires it, we may also process:</p> <ul style="list-style-type: none"> • Interview details; interview notes • Test will be conducted, and test outputs will be collected <p>If you contact us about a role outside of our website or recruitment platforms, we may process:</p> <ul style="list-style-type: none"> • the phone number you are contacting us from and the information you give us during the call (calls may be recorded) • your email address and the content of your email and any attachments • information from our service providers' websites • details of any support needs or communication preferences you disclose to us <p>If your application is successful, we may carry out additional checks and process further personal data, including:</p>	<ul style="list-style-type: none"> • We have legitimate interests for processing your personal data to: <ul style="list-style-type: none"> ○ ensure we employ the right person for the role; ○ carry out background checks for certain roles, where relevant and proportionate; ○ test your skills for certain roles in order to support accurate and fair assessments • If you have disabilities, we have certain legal obligations to obtain information about them so that we can ensure the role is suitable for you and if so to make reasonable adjustments for your disabilities during the recruitment process • We will ask for your consent, where required by applicable law, for example in relation to certain assessments, surveys, or the processing of specific categories of personal data.

	Stages of processing	Categories of your personal data processed and reasons for processing	Legal bases for processing your personal data
		<ul style="list-style-type: none"> Information about your identity such as your original passport, residence permits, work authorization documents in the EU or other country or passport or driving licence, information about your right to work and your tax residency, as required by applicable law in the relevant jurisdiction. Background checks: we may carry out background checks where permitted or required by law or where relevant to the role. We may require a police clearance certificate depending on the nature of the position (which may include criminal offence data) which will only be carried out where necessary and proportionate. References from past employers or professional contacts. Equality monitoring (voluntary): special categories of data such as gender and disability status for diversity reporting. We will also ask for your consent to participate in this type of monitoring, if we are required to do so by law. 	
(b)	Processing of criminal offence data	<p>In certain circumstances, we may process your criminal offences data, such as for:</p> <ul style="list-style-type: none"> Background checks- this may involve the processing of criminal offence data where: (i) required by applicable law or regulatory obligations; (ii) relevant for specific countries, roles, or sectors, depending on local requirements and the nature of the position; (iii) necessary to verify role-specific qualifications, certifications, or eligibility requirements, for example for roles in security-related functions such as the SOC team; or (iv) necessary and proportionate to assess your suitability for a particular role or in the context of legal proceedings. <p>Where a background check is required, we will inform you in advance.</p>	<ul style="list-style-type: none"> We have a legal obligation to carry out background checks where required by law We have legitimate interests to conduct background checks where not legally required but considered necessary and proportionate under internal policies; We have to take pre-contractual steps: where a background check is necessary in order to take steps before entering into an employment contract with you, Thinkproject may rely on taking pre-contractual steps at your request. Your consent: where applicable law requires your

	Stages of processing	Categories of your personal data processed and reasons for processing	Legal bases for processing your personal data
			consent for a specific check, or where Thinkproject decides to rely on consent for a particular check.
(c)	Personal Data processed at the end of recruitment process	<p>At the end of our recruitment process if you are:</p> <ul style="list-style-type: none"> • successful in the recruitment process, we will proceed with the next steps, including issuing an employment contract and onboarding you. • unsuccessful in the recruitment process, your personal data will be automatically anonymised after 6 months, subject to our legitimate interests to hold your data; please see the section headed: How long we keep your data? below for further information 	<ul style="list-style-type: none"> • We have legitimate interest to retain your data for limitation periods (that run for several years) to establish, exercise or defend legal claims for example in case of discrimination during the recruitment process • We have a legal obligation to hold your data for statutory or compliance purposes

Explanation of legal bases used in the table above

Legitimate interest means we rely on our business interests for the processing of your personal data for the given purpose, and have reasonable grounds to process your personal data that are not overridden by your interests, rights or freedoms (your personal data rights – see below). Your consent is not needed when we have a legitimate interest to process your personal data. Where we rely on legitimate interest as a legal basis, we assess and balance our interests against the potential impact on you.

Legal or regulatory obligation means we have to process your personal data to comply with applicable laws or regulatory requirements. Your consent is not needed when we have a legal obligation to process your personal data.

Consent. Some Data Protection Laws require you to give consent for us to process your special categories of personal data before doing so. When we rely on consent, we will provide you with clear information about the purpose of the processing, and you have the right to withdraw your consent at any time.

Who do we share your personal data with?

We may share your personal data with third parties in connection with our recruitment process, including:

- Thinkproject group entities to review and process your application.
- Recruitment platforms and service providers (such as LinkedIn or Naukri), that provide us with further insights such as analytics so that we can approach you if you are a good fit for a role or show you roles that are relevant to your skills. We have provided the Data Protection Statements of our service providers (see Annex 1) so you can read more about what your data is used for. In some cases, our service providers use your personal data for their own purposes if you have consent to this with them. You have the right to

object to this processing by turning off personalized marketing in the app with those service providers we use.

- Recruitment agencies
- Background check providers, where checks are required or permitted.
- Organizations that carry out assessments and surveys, to evaluate your suitability for a role.
- The service providers and organizations that help us with fraud prevention.
- Organizations that manage our CCTV and security devices if you visit our offices.
- Government agencies or regulatory authorities where necessary to meet our legal and statutory obligations.

When your personal data is shared with third parties, we ensure that appropriate safeguards are in place to guarantee that it will be processed lawfully and securely. For example, we share as little of your personal data with others as possible to achieve the purpose for the processing, and will encrypt or make it impossible for others to identify you where possible (for example, by using User ID rather than your name), if they don't need to know your name in order to process your data. We require our service providers to process personal data only on our instructions and for the purposes described in this Job Candidates Data Protection Statement, unless they act as independent controllers for their own purposes.

Where will your personal data be processed?

Thinkproject operates globally and as a result, your personal data may be processed in countries other than the one in which you are located.

Where personal data is transferred across borders, we ensure that appropriate safeguards are in place in accordance with applicable Data Protection Laws. Depending on the circumstances, this may include:

- transfers to countries or organizations that have been recognized as providing an adequate level of data protection; or
- the implementation of appropriate contractual or other legally recognized safeguards to ensure that your personal data remains protected.

We also take steps to ensure that access to your personal data is limited to what is necessary, and that appropriate technical and organizational measures are applied to protect it.

What about your data and its security?

We take all the steps that are reasonably necessary to ensure that there are appropriate security measures in place to handle your personal data safely. To do this we take technical and organizational measures (**TOMs**) to development and assess our security protocols to reduce the likelihood of your personal data being accidentally or unlawfully destroyed, lost, altered, disclosed or accessed without authority in our systems, transmitted, stored or otherwise processed in a way that results in any actual loss or misuse of your personal data (**data and/or security breach**). We put TOMs in place to:

- ensure communications over our systems are encrypted so that your data is made unreadable if anyone is listening
- promptly update and patch our servers to address vulnerabilities
- run responsible disclosure and bug bounty programs to identify security issues in our systems.

How long do we keep your personal data?

We retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including the time periods described in the table above.

In certain circumstances, we may retain your personal data for longer periods where this is necessary, for example: to establish, exercise, or defend legal claims; to comply with legal or regulatory obligations; or for the prevention and detection of fraud or other security-related purposes.

To determine appropriate retention periods, we consider factors such as the purpose for which the personal data is processed, the nature and sensitivity of the data, applicable legal or regulatory requirements, and the potential risks associated with retaining the data.

What about your data subject rights?

You have rights to be informed, to access your data, to rectify your data, to ask us to delete your data, to ask for restriction of processing your data, to data portability, to object to automated decision making, to withdraw consent you've given us at any time and to lodge a complaint with a competent data protection authority.

We encourage you to contact us first using the details above so that we can address your request or concern.

Automated decision-making

We do not make recruitment decisions about candidates based solely on automated processing, including profiling. Any decision regarding your application is subject to human involvement and assessment.

Annex 1- Our service providers

Rexx systems GmbH

Headquarters, Süderstrasse 75-79,
20097 Hamburg, Germany

Applicant Tracking System
Recruitment platform and job
applicant management services (job
postings, candidate search, and
application process management)
Job search and application related
services

<https://www.rexx-systems.com/data-protection/>

LinkedIn Recruiter

LinkedIn Ireland Unlimited Company,
Wilton Plaza Wilton Place, Dublin 2,
Ireland

<https://www.linkedin.com/legal/privacy-policy>

SEEK Limited

60 Cremorne Street, Cremorne,
Victoria 3121, Australia. For the New
Zealand platform, SEEK also
operates through SEEK (NZ) Limited,
Auckland, New Zealand.

Job board / online employment
marketplace. Recruitment platform
used for job postings, candidate
search, job applications, and
communication between
employers/recruiters and candidates.

[My Privacy | SEEK](#)

Info Edge (India) Limited

GF-12A, 94 Meghdoot Building,
Nehru Place, New Delhi - 110019,
India. Corporate office: B-8, Sector
132, Noida - 201304, India.

Job board / online employment portal.
Recruitment platform used for job
postings, candidate search, access to
candidate profiles/CVs, and
application management.

[Privacy Policy - Naukri.com](#)

Various third-party Recruitment
Agencies, information provided on
your request

Recruitment-related services (search
for employees, communication,
application process, contract
negotiations)

Information provided on
your request