

Recruitment Privacy Policy*

Data Privacy is a very important issue for us and we hold the protection of your personal data in very high esteem. The purpose of this Recruitment Privacy Policy is to let you know why we're collecting personal data as part of the recruiting process and how this data will be processed. We are committed to process your data in a diligent manner and to being transparent about what kind of information we collect from you, while complying to our data protection obligations.

We comply with the provisions of the German Federal Data Protection Act and the German Telemedia Act as well as with the EU General Data Protection Regulation.

This Recruitment Privacy Policy applies when you apply through our website www.kiron.ngo or when you contact us via email. If your application is carried out through another website or platform, the data protection provisions of the respective website or platform operator applies and we recommend that you obtain information on the respective website how your personal data is collected and processed.

What kind of information does Kiron collect from applicants?

In order to assure an effective recruitment process, we may collect the following personal information from candidates:

- Name and other personal information such as gender, date and place of birth;
- Contact information, such as address, telephone number, and email address;
- Past employment history (including previous employers, job titles, or positions) and references in order to evaluate potential employees for employment;
- Other academic, professional, training and salary-related information, such as academic degrees and professional qualifications;
- Your CV/résumé (which may include details of any memberships or interests constituting Special Categories of Personal Data (as that term is defined herein));
- National identifiers such as nationality/ies, national IDs/passport, social security / insurance numbers, immigration information, working permit and visa status;
- Information relating to previous applications you have made to Kiron and/or any previous employment history with Kiron; and
- Any other information you voluntarily provide throughout the process, including through interviews or other forms of assessment.

As a general rule, during the recruitment process, we try not to collect or process any Special Categories of Personal Data (as defined in Art. 9 para. 1 GDPR) unless authorized by law or where necessary to comply with applicable laws.



However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Special Categories of Personal Data for legitimate recruiting-related purposes. For example, information about your physical or mental condition may be collected in order to consider accommodations we need to make for the recruitment process and/or subsequent job role. You may provide, on a voluntary basis, other information including Special Categories of Personal Data during the recruiting process.

We collect this data through a variety of sources that could include your CV or resume and letters of reference that you share with us, email communication or through interviews.

We may also choose to collect more information about your professional background from professional social networks (LinkedIn; Xing) or from third parties through reference calls. Nonetheless, we will only seek information from third parties through reference calls from final candidates and in this case we will inform you beforehand.

The data we will collect will be stored safely in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why do we need to process personal data?

We collect and use this personal information primarily for recruiting purposes – in particular, to do a first assessment of the profiles that reach us, to determine your qualifications for employment and to make a hiring decision. This includes assessing your skills, qualifications and background for a particular role, verifying your information, carrying out reference and / or background checks (where applicable) and generally managing the hiring process and communicating with you about it. The legal basis for data processing is Article 6 para. 1 lit. (f) GDPR. Our legitimate interest follows from the above mentioned purposes for the collection of data.

Who has access to your personal data?

Your information may be shared internally for the purposes of the recruitment process. This includes members of the HR and recruitment team, interviewers involved in the recruitment process and managers responsible for the supervision of the future employee.

We will only share your data with third parties in case your application for employment is successful. In those cases, we might share some personal data with former employers with the mere purpose of obtaining references regarding your employment background.

How does Kiron Open Higher Education protect your data?

We take the security of your data seriously. We have internal processes in place to make sure data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their hiring responsibilities.

For how long does Kiron Open Higher Education keep your personal data?

In case your application is unsuccessful, we will inform you of it and your personal data will be deleted 6 months after termination of the recruiting process for the position you have applied for.

In case your application is unsuccessful, but we decide to keep your personal data in our Career Pool for consideration for future employment opportunities, you will be asked to give us your consent first. If you agree that we keep your personal data in our Career Pool, we will store it for a maximum of 12 months. You are entitled to withdraw your consent at any time. At the end of that period, or once you withdraw your consent, your data will be deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment.

Your rights

We want to ensure you are aware of your rights regarding your data. You can request:

- to access and obtain a copy of your personal data that we have collected and stored,
- for us to change incorrect or incomplete private information
- For us to delete or stop processing your data, especially if the data is no longer relevant for recruitment processes (when you have another job offer and is no longer interested in taking part in our recruitment process, for example)

If you would like to exercise any of these rights, please contact privacy@kiron.ngo.

What if you do not provide personal data?

You are under no obligation of providing personal information to Kiron Open Higher Education gGmbH during the recruitment process. However, if you choose not to provide us with personal information, we may not be able to process your application properly and may decide not to process it at all.