

Personio

This website uses the HR software “**Personio**” service, which is provided by Personio SE & Co. KG, Seidlstraße 3, 80335 Munich. This Privacy Notice applies both to data that we collect directly from you (Art. 13 GDPR) and to data that we obtain from other sources (Art. 14 GDPR).

Personio is a cloud-based human resources management software system (HR software) that we use to manage, organise and handle all HR-related processes within our company. This includes maintaining the digital personnel file, applicant management, remuneration-related information, reporting and core personal data.

Personio acts as a processor within the scope of Art. 28 GDPR. Personio processes your data solely on our instructions as a processor in accordance with Art. 28 GDPR. For this purpose, we have entered into a Data Processing Agreement (DPA) with Personio.

Data is processed in Germany. As a rule, no data is transferred to third countries outside the EU/EEA. Should access from a third country be required in an individual case, for example by sub-processors providing technical support, this will take place solely on the basis of appropriate safeguards within the scope of Art. 46 GDPR, in particular through the conclusion of Standard Contractual Clauses adopted by the European Commission and supplementary technical and organisational measures. A complete and up-to-date list of the sub-processors used by Personio can be found here:

- **Hosting of the servers used to operate the software**

Amazon Web Services EMEA SARL

38 avenue John F. Kennedy

L-1855 Luxembourg

Data storage location: AWS Region: Frankfurt/Europe

Purpose: Data hosting and AWS Bedrock (LLM hosting)

- **Sending of (transactional) emails and calendar invitations**

Mailjet S.A., (merged with Mailgun Technologies, Inc.)

13-13 bis rue de l’Aubrac

75012 Paris

France

Data storage location: EU Frankfurt, Belgium

Purpose: App communication

- **Data Warehouse**

Snowflake Computing Netherlands B.V.,
FOZ Building, Gustav Mahlerlaan 300-314,
1082 ME Amsterdam, the Netherlands
Data storage location: AWS, region: Frankfurt/Europe
Purpose: Reporting engine

- **Authentication**

Okta, Inc.
35 Shelbourne Rd, Ballsbridge
Dublin, D04 A4E0, Ireland
Data storage location: EU – Ireland and Frankfurt
Purpose: Authentication process

When using Personio, we process the following categories of personal data, depending on whether you are, for example, an applicant, an employee or a former employee:

- **Core personal data:** First and last name, academic degree, date and place of birth, gender, address, nationality, marital status
- **Contact details:** Private and business telephone numbers, email addresses and, where applicable, the address of an emergency contact person
- **Contractual and employment data:** Personnel number, employment start/end date, position, department, line manager, employment contract, working-time model, fixed-term arrangements, probationary periods
- **Qualification data:** Vocational training, university education, professional history, references, certificates, language skills, further training, assessments, agreed objectives
- **Applicant data:** Cover letter, CV, references, application photograph (where voluntarily provided), application history, interview notes, assessments, correspondence
- **Payroll and social security data:** Bank details, salary and wage data, tax identification number, tax class, social security number, health insurance provider, religious affiliation (for payroll tax purposes), child tax allowances, garnishment orders

- **Working-time and absence data:** Working hours, overtime, leave requests and balances, sickness absences (without diagnosis), parental leave, other absences
- **Communication and usage data:** Login details, IP addresses, timestamps, documents created in the software, uploaded files, workflow and approval data
- **Special categories of personal data (Art. 9 GDPR):** only where legally required or with your explicit consent, for example data concerning severe disability (to fulfil obligations under social law) or religious affiliation (for payroll tax purposes)

We process your personal data in Personio for the following purposes, on the legal bases specified in each case:

Purpose	Lawful Basis
Conducting the recruitment process, management, correspondence, and decisions)	Art. 6(1)(b) GDPR; Art. 6(1)(a) GDPR (consent, for example for inclusion pool)
Establishing, performing and terminating employment relationship (digital contract management, onboarding)	Art. 6(1)(b) GDPR
Payroll, fulfilment of tax and social security obligations, reporting to authorities)	Art. 6(1)(c) GDPR (legal obligation)
Working-time and absence management (including leave and sickness absence management)	Art. 6(1)(b) and (c) GDPR
Staff development, performance management, agreed objectives, training)	Art. 6(1)(b) and (f) GDPR
Organisational administration, recruitment, workforce planning, anonymised/pseudonymised HR data)	Art. 6(1)(f) GDPR
Safeguarding IT and data security, system misuse detection)	Art. 6(1)(f) GDPR (legitimate interest in system security); Art. 32 GDPR

Purpose	Lawful Basis
Compliance with statutory retention obligations	Art. 6(1)(c) GDPR
Establishment, exercise and defence of legal claims	Art. 6(1)(f) GDPR; Art. 9(2)(f) GDPR
Processing of special categories data (e.g. severe disability, health data)	Art. 9(2)(b) GDPR; where applicable, Art. 9(2)(a) GDPR (consent)

Where processing is based on consent (Art. 6(1)(a), Art. 9(2)(a) GDPR), you may withdraw your consent at any time with effect for the future, without affecting the lawfulness of processing carried out before withdrawal.

Within our company, only those persons and departments that require access to your data in order to fulfil the above-mentioned purposes have access to it. This includes the HR department, the relevant specialist and managerial staff, and the management team.

In addition, we disclose your data to the following recipients or categories of recipients:

- **Processors:** Personio SE & Co. KG (provision and operation of the HR software) and its sub-processors, in particular Amazon Web Services EMEA SARL (hosting in Frankfurt am Main).
- **Tax advisers, payroll service providers and auditors:** for the fulfilment of tax, social security and commercial-law obligations.
- **Social security institutions, tax authorities, employers' liability insurance associations and other public bodies,** where there are statutory disclosure obligations.
- **Banks and payment service providers,** where this is necessary for the payment of salaries and wages.
- **Other processors,** for example providers of supplementary tools connected to Personio through interfaces (e.g. payroll software, single sign-on providers and calendar systems, where used by us).
- **Lawyers, courts and other bodies,** where this is necessary for the establishment, exercise or defence of legal claims.

We retain your personal data only for as long as necessary for the purposes stated above or as required by statutory retention obligations. Once the purpose no longer applies and the statutory retention periods have expired, the data is deleted or anonymised.

Where we do not collect personal data concerning you directly from you, it originates from the following sources:

- information provided by recruitment agencies or headhunters, where you have instructed them to disclose your data;
- referees named by you (e.g. former employers or higher education institutions), where you have provided their contact details and consented to our contacting them
- social security institutions, tax authorities and other public bodies in the context of statutory reporting procedures;
- previous employers in the context of statutory disclosure obligations (e.g. wage tax certificates).

No decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you (Art. 22 GDPR), is made in connection with the use of Personio.

Both we, as controller, and Personio, as processor, have implemented appropriate technical and organisational measures in accordance with Art. 32 GDPR to protect your data against unauthorised access, loss, alteration or disclosure.

We reserve the right to amend this Privacy Notice in order to keep it up to date in response to changes in the legal framework or our processing activities. We will inform you of material changes in an appropriate manner.

06/2026