

# Data protection information for applicants

As of January 19, 2026

Dear applicants,

Thank you for your interest in our company. In accordance with the provisions of Articles 13, 14, and 21 of the General Data Protection Regulation (GDPR), we hereby inform you about the processing of personal data submitted by you during the application process and, if applicable, collected by us or third parties, as well as your rights in this regard. To ensure that you are fully informed about the processing of your personal data as part of the application process, please take note of the following information.

## 1. Name and contact details of the controller

innoscripta SE Arnulfstraße 60

innoscripta SE  
Arnulfstraße 60  
80335 Munich  
Tel: +49 89 25555 3568  
Email: [datenschutz@innoscripta.com](mailto:datenschutz@innoscripta.com)  
Website: <https://www.innoscripta.com>

## 2. Contact details of the data protection officer

The designated data protection officer is

DataCo GmbH  
Sandstr. 33  
80335 Munich  
Tel:  
Email: [datenschutz@dataguard.de](mailto:datenschutz@dataguard.de) Website: [www.dataguard.de](http://www.dataguard.de)

## 3. Sources from which your personal data originates

Your personal data:

- Title
- Gender
- Address
- Professional qualifications and further training
- Last name
- First name
- Your email address,
- Your mobile phone number
- Your landline number
- Resume
- References

- Title
- School education
- Desired position
- Desired employment relationship
- Desired location
- Desired start date
- Salary expectations
- Additional data that you share with us during the application process, such as
  - certificate of good conduct
  - visa
  - Copy of your identity card
  - Certificate of enrollment
  - Health insurance membership certificate
  - Personal questionnaire
  - Holiday certificate from previous employer come

from **LinkedIn** and the following sources:

- **StepStone and similar career sites**
- **Innoscripta career website**
- **Colleges/universities**
- **Appointly**
- **Career fairs**

Personal data that has not been actively requested by us will be restricted and deleted if necessary.

#### **4. Purposes of processing and their legal basis**

**Your personal data will be processed for the following purposes:**

- Conducting the application process and deciding on the establishment of an employment relationship
- Communication (telephone, email)
- Implementation of pre-contractual measures (initiation of the employment relationship)
- Inclusion of applicant data in an applicant pool
- Asserting, exercising, or defending legal claims arising from the application process
- Depending on the individual case and the vacancy to be filled in the company, comparison with terror and sanctions lists to avoid economic and/or compliance risks

#### **Processing of special categories of personal data that have been made public – Art. 9 (2)**

##### **(e) GDPR**

Insofar as special categories of personal data are processed that you have obviously made public, your data will be processed in accordance with Art. 9 (2) (e) GDPR.

**Processing for the purpose of asserting, exercising, or defending legal claims or in the context of court proceedings – Art. 6(1)(f) GDPR, Art. 9(1)(f) GDPR**

Where necessary, your data will be processed for the purpose of asserting, exercising, or defending legal claims or in the event of court proceedings in accordance with Art. 6 (1) (f) GDPR and Art. 9 (1) (f) GDPR.

**Processing based on consent – Art. 6 (1) (a) GDPR in conjunction with Art. 7 GDPR, Art. 88 (1) GDPR in conjunction with Art. 26 (2) BDSG**

If you have given your consent to data processing, your data will be processed in accordance with Art. 6 (1) (a) GDPR in conjunction with Art. 7 GDPR, Art. 88 (1) GDPR in conjunction with Art. 26 (2) BDSG.

**Decision on the establishment of the employment relationship Art. 6 (1) (b) GDPR, Art. 88 (1) GDPR in conjunction with § 26 (1) BDSG**

We process your data in order to make a decision on the establishment of the employment relationship. If you are hired by our company, your data will be processed for the purpose of implementing and terminating the employment relationship. Separate information will be provided on the processing of your personal data for this purpose.

**Processing based on legitimate interest – Art. 6 (1) (f) GDPR** Insofar as processing is carried out to safeguard a legitimate interest of ours or of a third party and your interests or fundamental rights and freedoms do not outweigh the former interest, Art. 6 (1) (f) GDPR serves as the legal basis for data processing. Our legitimate interest arises in particular from the following reasons:

- The proper execution and optimization of the application process
- Assertion, exercise, or defense of legal claims
- Avoiding economic and/or compliance risks, in particular as a result of maintaining business or working relationships with sanctioned persons

**Processing of special categories of personal data – Art. 9 (2) (a) GDPR** If you have given your consent to the processing of special categories of personal data, such as health data, religious affiliation, or nationality, your data will be processed in accordance with Art. 9 (2) (a) GDPR.

## **5. Recipients or categories of recipients of personal data**

In the context of processing your personal data, we may pass on personal data concerning you to the following recipients:

- Within our company, exclusively to those departments and individuals who need this data to fulfill contractual and legal obligations or to implement our legitimate interests
- Human resources department
- External employees/freelancers
- Processors
- Affiliated companies

As part of the application process, your personal data will only be forwarded to those employees of our company who need it to fulfill the purposes specified in section 3. Your personal data will not be transferred to third parties as part of the application process.

In addition, your personal data may be transferred to the following service providers based in a country outside the EU/EEA:

- MITTELSTAND CONNECT BİLİŞİM TEKNOLOJİLERİ ANONİM ŞİRKETİ, **Turkey**

In the case of processors and service providers outside the EU/EEA, your above-mentioned personal data will only be processed to the extent that this is the subject of our processing agreement with these recipients in accordance with Art. 28 GDPR.

## **6. Transfer of personal data to a third country**

As a matter of principle, the personal data collected and generated during the provision of relevant products and services is stored on our servers in the European Union. Since the providers of our software solutions offer their products and/or services worldwide on the basis of available resources and servers, your personal data may be transferred to other jurisdictions outside the European Union and the European Economic Area or accessed from such jurisdictions.

In particular, personal data is transferred to the third country Turkey within the meaning of Art. 15 (2) GDPR. In order to ensure the continued level of protection required when transferring data to a third country, contractual measures are agreed for this purpose.

The service provider has its registered office in Turkey. There is currently no adequacy decision by the European Commission pursuant to Art. 45 GDPR for this third country. In order to ensure appropriate safeguards for the protection of the transfer and processing of personal data outside the EU, the transfer of data to and processing of data by our service provider is based on appropriate safeguards in accordance with Art. 46 et seq. GDPR, in particular through the conclusion of so-called standard data protection clauses in accordance with Art. 46 (2) (c) GDPR.

## **7. Duration of storage of personal data**

We will delete your personal data as soon as the purposes for its storage as specified in section 4 no longer apply, or if you object to the use of your personal data (in the case of processing based on legitimate interests) or if you revoke your

previously given consent. However, your personal data may also be stored beyond this, in particular in the following cases:

- if deletion is prevented by contractual, statutory (in particular under the German Commercial Code (HGB), Criminal Code (StGB), and Fiscal Code (AO)) or statutory retention periods
- for the assertion, exercise, or defense of legal claims
- if this is necessary under European or national laws to fulfill a legal obligation to which we are subject.

Legal provisions stipulate the following retention periods for us in particular:

- After a decision not to fill the position: 6-month retention period for application documents (Section 15 (4) of the General Equal Treatment Act (AGG), Section 224 of the German Code of Civil Procedure (ZPO)).

If the applicant has given their consent, the application documents will be added to the applicant pool and stored there for a maximum of 2 years from the date of consent. They will be deleted when the purpose ceases to apply or when the applicant revokes their consent.

If you are hired by our company, your personal data will be deleted when the purpose ceases to apply, at the latest after the end of the employment relationship, unless statutory retention periods prevent deletion.

## **8. Rights of data subjects**

According to the General Data Protection Regulation, you have the following rights:

- If your personal data is processed, you have the right to obtain information from the controller about the data stored about you (Art. 15 GDPR).
- If incorrect personal data is processed, you have the right to request its correction (Art. 16 GDPR).
- If the legal requirements are met, you can request the erasure or restriction of processing (Articles 17 and 18 GDPR).
- If you have consented to data processing or if a contract for data processing exists and the data processing is carried out using automated procedures, you may have a right to data portability (Art. 20 GDPR).
- If you object to processing for direct marketing purposes, the personal data concerning you will no longer be processed for these purposes.
- You also have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). The supervisory authority responsible for us is the Berlin Commissioner for Data Protection and Freedom of Information. You can contact them at

The Bavarian State Office for Data Protection Supervision (BayLDA)

Promenade 18, 91522 Ansbach

Postal address: P.O. Box 1349, 91504 Ansbach

Phone: 0981/ 180093-0  
Fax: 0981/ 180093-800  
Email: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)  
Website: [www.lda.bayern.de](http://www.lda.bayern.de)

If the legal requirements are met, you may, for reasons arising from your particular situation, object at any time to the processing of personal data concerning you that is carried out on the basis of Article 6(1)(e) or (f) GDPR (Article 21 GDPR).

**Right of withdrawal of consent**

If you have consented to the processing of your personal data by the controller, you can revoke your consent at any time for the future. In this case, the lawfulness of the data processing that took place until the revocation remains unaffected (Art. 7 (3) GDPR).

**9. Automated decision-making (in individual cases) including profiling**

**No automated decision-making / no profiling**

We do not use automated decision-making, including profiling, in accordance with Art. 22 (1) and (4) GDPR, not even during the application process. This means that we do not make any decisions based solely on automated processing, including profiling, which would have legal effects on the data subject or significantly affect them in a similar way.

This data information was created with the support of [DataGuard](#).