

Who are we?

We are the cetacea GmbH located in, Goethestraße 21, 80336 Munich, Germany.

What does this policy cover?

We at cetacea take your personal data seriously.

This policy:

- sets out the types of personal data that we collect about you;
- explains how and why we collect and use your personal data;
- explains how long we keep your personal data;
- explains when, why, and with whom we will share your personal data;
- sets out the legal basis we have for using your personal data;
- explains the effect of refusing to provide the personal data requested;
- explains the different rights and choices you have when it comes to your personal data; and
- explains how we may contact you and how you can contact us.

What personal data do we collect about you?

We collect the information necessary to find available opportunities and further information needed to assess your eligibility through the different stages of recruitment. This information includes CVs, identification documents, educational records, work history, employment and references, and interview reports.

We do not collect sensitive personal data about you, personal data, meaning data regarding racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, or information concerning an individual's health, sex life, sexual orientation, and criminal convictions information.

Where do we collect personal data about you from?

The following are the different sources we may collect personal data about you from:

- **Directly from you.** This is information you provide while searching for a new opportunity and/or during the different recruitment stages.
- **Through publicly available sources.** We use the following public sources:
 - o LinkedIn
 - o Company websites
 - o Facebook
 - o Twitter
 - o News Articles
- **By Reference or word of mouth.** For example, you may be recommended by a friend, a former employer, a colleague, or even a present employer. If something unexpected comes up during our research, we will contact you and allow you to comment.

How and why do we use your personal data?

We use your personal data to match your skills, experience, and education with potential opportunities. We will initially collect basic information on you, such as contact details, job role, and experience. If you go to the next stage, we will collect more information from you at the interview (or equivalent) stage and onwards in that manner.

How long do we keep your personal data?

We only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, please be advised that we may retain some of your information after you cease to use our services, for instance, if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

When determining the relevant retention periods, we will take into account factors including:

- (a) our contractual obligations and rights in relation to the information involved;
- (b) legal obligation(s) under applicable law to retain data for a certain period;
- (c) statute of limitations under applicable law(s);
- (d) (potential) disputes;
- (e) if you have requested to have your information deleted; and
- (f) guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed. This will usually be after 12 months. However, in the case of contractual or legal obligations, this may be up to six years.

To whom do we share your personal data?

Your personal data is shared within the cetacea group. For further information on these data transfers outside the EEA, see below.

What legal basis do we have for using your information?

For prospective candidates, referees, and clients, our processing is necessary for our legitimate interests. We need the information to assess suitability for potential roles, find potential candidates, and contact clients and referees. If you are shortlisted as a candidate, this may involve processing more detailed personal data, including sensitive data such as health information that you or others provide about you. In that case, we always ask for your consent before undertaking such processing.

What happens if you do not provide us with the requested information or ask that we stop processing your information?

If you do not provide the personal data necessary or withdraw your consent for the processing of your personal data, we may not be able to match you with available job opportunities.

Do we make automated decisions concerning you?

No, we do not carry out automated profiling.

Do we use Cookies to collect personal data on you?

To provide better service to you on our websites, we use cookies to collect your personal data when you browse.

Do we transfer your data outside the EEA?

We do not transfer your data outside the EEA.

What rights do you have about the data we hold on to you?

By law, you have several rights regarding your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country.

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent, and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
2. The right of access	You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information following data protection law.
3. The right of rectification	You are entitled to have your information corrected if it's inaccurate or incomplete.
4. The right to rectification	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. The right to restrict processing	You have the right to 'block' or suppress further use of your information. When processing is restricted, we can still store your information but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to ensure the restriction is respected in the future.
6. The right to data portability	You have the right to obtain and reuse your personal data for your own purposes across different services. For example, suppose you decide to switch to a new provider. In that case, this enables you to move, copy or transfer your information between our IT systems and theirs safely and securely without affecting its usability.

7. The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing (i.e., if you no longer want to be contacted with potential opportunities).
8. The right to lodge a complaint	You have the right to complain about how we handle or process your personal data with your national data protection regulator.
9. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month of receiving your request, but if the request is going to take longer to deal with, we'll come back to you and let you know.

How will we contact you?

We may contact you by phone, email, or social media. If you prefer a particular contact means over another, please just let us know.

How can you contact us?

If you are unhappy with how we've handled your information or have further questions on the processing of your personal data, contact us here: info@cetacea-gmbh.de