



Application Privacy Policy

15.02.2024



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1. General

In accordance with the requirements of Articles 13, 14 and 21 of the [General Data Protection Regulation \(GDPR\)](#), we hereby inform you about the processing of personal data collected and processed from you as well as your rights under data protection law in this regard when you apply for a position at enspired.

2. Purpose and legal basis of the data processing

We process your personal data listed in the appendix in order to carry out the application process with you and to ensure optimal staffing within our company.

We do this on the legal basis of our legitimate interest in conducting an efficient application process in accordance with Art. 6 (1) lit. f GDPR and based on the need to carry out pre-contractual measures in accordance with Art. 6 (1) lit. b GDPR. We collect this data as part of the application process either by you providing it to us (for example, by sending your resume by email) or by recruiting agencies/ recruiting consultants and by us collecting it ourselves (for example, by recording notes during the job interview) as well as Recruiting Tools/ Platforms. The application via the recruitment tools is based on your consent (Art. 6 para. 1 lit. a GDPR).

2.1 Contact details of the data protection controller

If you have any questions about data protection, you will find the contact details of the responsible person or controller below

enspired GmbH
Wagenseilgasse 3

1120 Wien

E-Mail: privacy@enspired-trading.com

3. Data receiver

We will transfer your data to the following recipients in the course of the application process:

- Employees who are involved in the application process.
- Employees who are involved in the decision on filling the position
- IT service providers
- Legal representatives

4. Transfer to third countries

If we transfer personal data to service providers outside the European Economic Area (EEA), the transfer will only take place if the third country has been confirmed by the EU Commission to have an adequate level of data protection or if other appropriate data protection guarantees (EU standard contractual clauses) are in place. You can request further information on this at privacy@enspired-trading.com. In addition, you have the right to request confirmation from us that the relevant contractual agreements have been concluded.

5. Duration of processing

If your application is successful, we can process the data you have provided for the employment relationship. In addition, we will store your data collected in connection with the application process in any case for as long as there are statutory retention obligations or any legal claims have not yet become time-barred.

We generally retain your data for seven months from the date of completion of an unsuccessful application process in accordance with existing decisions of the data protection authority.

It is also possible to retain the data for up to 12 months if you have consented to this longer retention period.

6. Your rights

Under applicable law, you are entitled, inter alia (subject to the conditions of applicable law), (i) to verify whether and which personal data we have stored about you and to obtain copies of such data, (ii) to request the rectification, amendment, or erasure of your personal data that is incorrect or not processed in accordance with the law, (iii) to request us to restrict the processing of your personal data, (iv) in certain circumstances, object to the processing of your personal data or revoke any consent previously given for the processing, such revocation not affecting the lawfulness of the processing until revocation (v) request data portability, (vi) know the identity of third parties to whom your personal data is transferred, and (vii) lodge a complaint with the data protection authority.

About the right of objection

Insofar as the processing of your personal data is carried out in accordance with Art. 6 para 1 lit. f GDPR for the protection of our legitimate interest, you have the right in accordance with Art. 21 GDPR to object to the processing of this data at any time for reasons arising from your particular situation. Enspired will then no longer process this personal data unless we can demonstrate compelling legitimate grounds for the processing. These must override your interests, rights and freedoms, or the processing must serve the assertion, exercise or defense of legal claims.

To exercise your rights, please contact privacy@enspired-trading.com.

If you believe that the processing of your data violates data protection law or your data protection rights have otherwise been violated in some way, you can also complain to the data protection authority.

Austria Data Protection Authority

Head: Andrea Jelinek, M.D.

Address: Barichgasse 40-42, 1030 Vienna

Telephone number: +43 1 52 152-0

E-mail address: dsb@dsb.gv.at

Website: <https://www.dsb.gv.at/>

7. Obligation to provide data

You are not obliged to provide us with your personal data. However, if you do not do so, it will not be possible for us to carry out the application process with you.

8. The use of recruiting tools

Various companies offer software programs that can make application processes much easier. Most systems offer options to filter searches through databases of potential candidates. This enables us to quickly and efficiently find employees who are a great fit for our company. When using recruiting tools or online forms, applicants' personal data is transmitted, retained and managed.

8.1.1 Why do we use recruiting tools?

To search for suitable applicants and to administer all application documents, we use software programs and platforms that specialize in application management, taking into account all legal guidelines. So-called recruiting tools usually make the application process easier because the software takes on many administrative tasks and optimizes processes in the application process. In some cases, this enables us to find suitable employees for our company more quickly.

For the conditions of the recruiting process, we refer in detail to the respective job advertisements.

8.1.2 Recruitee Privacy Policy

We use the recruiting tool Recruitee. The provider of this service is the Dutch company Recruitee B.V, Keizersgracht 313, 1016 EE Amsterdam, The Netherlands. You can find out more about the data that is processed by using Recruitee in their Privacy Policy at <https://recruitee.com/en/privacy>.

We have entered a Data Processing Agreement (DPA) with Recruitee in accordance with Article 28 of the General Data Protection Regulation (GDPR).



This agreement is a legal requirement as Recruitee processes personal data on our behalf. It clarifies that Recruitee may only process any data they receive from us according to our instructions and in compliance with the GDPR.

If you want to apply for a job with us online, you will land on our Recruitee landing page. In order for our landing page to work, technically necessary cookies must be set. The website might not function properly without these cookies, they are enabled by default and cannot be disabled.

Here is a list of these cookies:

Name: _cs_consent

Purpose: Stores the user's cookie consent state for the current domain.

Expiry date: 180 days

8.1.3 JOIN Privacy Policy

We also use recruiting service of JOIN. JOIN is a service of the Swiss company JOIN Solutions AG, Eichenstrasse 2, 8808 Pfäffikon SZ, Switzerland.

Your data can be transferred to Switzerland. Switzerland is outside the scope of the GDPR. However, on the basis of Art. 45 (1) pf the GDPR, the European Commission has decided that Switzerland offers a level of protection that is comparable to the standard of the GDPR. You can view the decision here: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32000D0518>.

You can find out more about the data that is processed through the use of Join in their Privacy Policy at <https://join.com/privacy-policy>.

We have entered a Data Processing Agreement (DPA) with JOIN in accordance with Article 28 of the General Data Protection Regulation (GDPR).

This agreement is a legal requirement as JOIN processes personal data on our behalf. It clarifies that JOIN may only process any data they receive from us according to our instructions and in compliance with the GDPR. You can find the link to the Data Processing Agreement (DPA) at <https://join.com/de/dpa>.

8.1.4 LinkedIn Recruiter

We also use the LinkedIn Recruiter recruiting tool. The provider of this service is the American company LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Moreover, LinkedIn Ireland Unlimited Company Wilton Place in Dublin is responsible for data processing in the European Economic Area and Switzerland.

LinkedIn also processes data in the United States, among other countries. Currently LinkedIn is not a participant of the [Data Privacy Framework Program](#). We would like to note, that US companies that do not participate in the Data Privacy Framework Program are not certified by the European Commission as having an adequate level of data protection. This can be associated with various risks to the legality and security of data processing. More information can be found at https://ec.europa.eu/commission/presscorner/detail/en/qanda_23_3752 as well at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en.



LinkedIn also processes data in the USA, among other countries. LinkedIn uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige LinkedIn to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847

You can find out more about the data that is processed by LinkedIn Recruiter in their Privacy Policy at <https://www.linkedin.com/legal/privacy-policy>

We have entered a Data Processing Agreement (DPA) with LinkedIn in accordance with Article 28 of the General Data Protection Regulation (GDPR).

This agreement is a legal requirement as LinkedIn processes personal data on our behalf. It clarifies that LinkedIn may only process any data they receive from us according to our instructions and in compliance with the GDPR. You can find the link to the Data Processing Agreement (DPA) at <https://www.linkedin.com/legal/l/dpa?>.

8.1.5 Indeed Privacy Policy

We are also using Indeed, a recruiting service of the company Indeed Inc., Indeed Tower 200 West 6th Street, Floor 36, Austin, TX 78701, USA. The Indeed Ireland Operations Limited is responsible for data processing if you are located outside of the United States and Japan.

When you are on our Recruitee landing page, you can choose to Apply with Indeed in the cookie banner. The Apply with Indeed feature allows you to quickly apply using an Indeed Resume. With your consent, the Apply with Indeed feature is enabled and cookies are set by Indeed.

The following cookies are set:

Name: __cf_bm

Expiry date: 30 Minutes

Name: __cflb

Expiry date: 1 Day

Name: _cfuvid

Expiry date: End of Session

Name: CTK

Expiry date: 400 Days

Name: INDEED_CSRF_TOKEN

Expiry date: End of Session

For details about cookies used and the data received by Indeed see [Indeed's Privacy Policy](#).

If you have consented to the processing and storage of your data by Indeed, your consent is considered the legal basis for data processing (Art. 6 Para. 1 lit. a GDPR).

Indeed also processes data from you in the USA. Indeed, is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal

data from EU citizens to the USA. More information can be found at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en.

We have entered a Data Processing Agreement (DPA) with Indeed in accordance with Article 28 of the General Data Protection Regulation (GDPR).

This agreement is a legal requirement as Indeed processes personal data on our behalf. It clarifies that Indeed may only process any data they receive from us according to our instructions and in compliance with the GDPR. You can find the link to the Data Processing Agreement (DPA) at <https://at.indeed.com/legal?hl=en#dpa>.

9. Data Processing in case of an in-person interview






If we invite you to a personal interview, it may happen that we take over the booking of the trip and that personal data is passed on to accommodation companies and transport companies. This includes in particular name, surname, address data, date of birth, citizenship, identity card data, travel data. The reason for this is the booking of accommodation and train or flight tickets.

Enspired uses the software TravelPerk of the company TRAVELPERK, S.L.U. , Avinguda Catedral 6-8, 1st floor (08002) - Barcelona, Spain for the processing of business trips. TravelPerk acts as an data processor for us and data processing only takes place within the framework of the concluded order processing contract.

For more information on how TravelPerk processes personal data, please visit <https://www.travelperk.com/de/data-protection/>.

10. Audio & Video

Audio & Video Privacy Policy Overview

-  Affected parties: website visitors
-  Purpose: service optimisation
-  Processed data: Data such as contact details, user behaviour, device information and IP addresses can be stored.
You can find more details in the Privacy Policy below.
-  Storage period: data are retained for as long as necessary for the provision of the service
-  Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

10.1 What are audio and video elements?

We have integrated audio and video elements to our website. Therefore, you can watch videos directly via our website. This content is delivered by service providers and is obtained from the respective providers' servers.

Audio and video elements are integrated functional elements of platforms such as YouTube.

If you use audio or video elements on our website, your personal data may get transmitted to as well as processed and retained by service providers.

10.2 Why do we use audio & video elements on our website?

We of course want to provide you with the best offer on our website. And we are aware that content is no longer just conveyed in text and static images. Instead of just giving you a link to a video, we offer you audio and video formats directly on our website. These are entertaining or informative, but ideally, they are both. Our service therefore gets expanded, and it gets easier for you to access interesting content. In addition to our texts and images, we thus also offer video and/or audio content.

10.3 Which data are retained by audio & video elements?

When you visit a page on our website with e.g. an embedded video, your server connects to the service provider's server. Thus, your data will also be transferred to the third-party provider, where it will be stored. Certain data is collected and stored regardless of whether you have an account with the third party provider or not. This usually includes your IP address, browser type, operating system and other general information about your device. Most providers also collect information on your web activity. This e.g. includes the session duration, bounce rate, the buttons you clicked or information about the website you are using the service on. This data is mostly stored via cookies or pixel tags (also known as web beacons). Any data that is pseudonymised usually gets stored in your browser via cookies. In the respective provider's Privacy Policy, you can always find more information on the data that is stored and processed.

10.4 Duration of data processing

You can find out exactly how long the data is stored on the third-party provider's servers either in a lower point of the respective tool's Privacy Policy or in the provider's Privacy Policy. Generally, personal data is only processed for as long as is absolutely necessary for the provision of our services or products. This usually also applies to third-party providers. In most cases, you can assume that certain data will be stored on third-party providers' servers for several years. Data can be retained for different amounts of time, especially when stored in cookies. Some cookies are deleted after you leave a website, while others may be stored in your browser for a few years.

10.5 Right to object

You also retain the right and the option to revoke your consent to the use of cookies or third-party providers at any time. This can be done either via our cookie management tool or via other opt-out functions. You can e.g. also prevent data retention via cookies by



managing, deactivating or erasing cookies in your browser. The legality of the processing up to the point of revocation remains unaffected.






Since the integrated audio and video functions on our site usually also use cookies and you can find out more about the handling and storage of your data in the Privacy Policies of the respective third party providers.

10.6 Legal basis

If you have consented to the processing and storage of your data by integrated audio and video elements, your consent is considered the legal basis for data processing (Art. 6 Para. 1 lit. a GDPR). Generally, your data is also stored and processed on the basis of our legitimate interest (Art. 6 Para. 1 lit. f GDPR) in maintaining fast and good communication with you or other customers and business partners. We only use the integrated audio and video elements if you have consented to it.

10.7 YouTube Privacy Policy

YouTube Privacy Policy Overview

-  Affected parties: website visitors
-  Purpose: optimising our service
-  Processed data: Data such as contact details, data on user behaviour, information about your device and IP address may be stored. You can find more details on this in the privacy policy below.
-  Storage period: data are generally stored for as long as is necessary for the purpose of the service
-  Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

10.7.1 What is YouTube?

We have integrated YouTube videos to our website. Therefore, we can show you interesting videos directly on our site. YouTube is a video portal, which has been a subsidiary company of Google LLC since 2006. The video portal is operated by YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. When you visit a page on our website that contains an embedded YouTube video, your browser automatically connects to the servers of YouTube or Google. Thereby, certain data are transferred (depending on the settings). Google is responsible for YouTube's data processing and therefore Google's data protection applies.

In the following we will explain in more detail which data is processed, why we have integrated YouTube videos and how you can manage or clear your data.

For us to be able to display videos on our website, YouTube provides a code snippet that we have integrated to our website.

10.7.2 Why do we use YouTube videos on our website?

YouTube is the video platform with the most visitors and best content. We strive to offer you the best possible user experience on our website, which of course includes interesting videos. With the help of our embedded videos, we can provide you other helpful content in addition to our texts and images.

10.7.3 What data is stored by YouTube?

As soon as you visit one of our pages with an integrated YouTube, YouTube places at least one cookie that stores your IP address and our URL. If you are logged into your YouTube account, by using cookies YouTube can usually associate your interactions on our website with your profile. This includes data such as session duration, bounce rate, approximate location, technical information such as browser type, screen resolution or your Internet provider. Additional data can include contact details, potential ratings, shared content via social media or YouTube videos you added to your favourites.

If you are not logged in to a Google or YouTube account, Google stores data with a unique identifier linked to your device, browser or app. Thereby, e.g. your preferred language setting is maintained. However, many interaction data cannot be saved since less cookies are set.

In the following list we show you cookies that were placed in the browser during a test. On the one hand, we show cookies that were set without being logged into a YouTube account. On the other hand, we show you what cookies were placed while being logged in. We do not claim for this list to be exhaustive, as user data always depend on how you interact with YouTube.

Name: YSC

Value: b9-CV6ojI5Y112024533-1

Purpose: This cookie registers a unique ID to store statistics of the video that was viewed.

Expiry date: after end of session

Name: PREF

Value: f1=50000000

Purpose: This cookie also registers your unique ID. Google receives statistics via PREF on how you use YouTube videos on our website.

Expiry date: after 8 months

Name: GPS

Value: 1

Purpose: This cookie registers your unique ID on mobile devices to track GPS locations.

Expiry date: after 30 minutes

Name: VISITOR_INFO1_LIVE

Value: 95Chz8bagyU

Purpose: This cookie tries to estimate the user's internet bandwidth on our sites (that have built-in YouTube videos).

Expiry date: after 8 months

Further cookies that are placed when you are logged into your YouTube account:

Name: APISID

Value: zILivClZSkqGsSwI/AU1aZI6HY7112024533-

Purpose: This cookie is used to create a profile on your interests. This data is then used for personalised advertisements.

Expiry date: after 2 years

Name: CONSENT

Value: YES+AT.de+20150628-20-0

Purpose: The cookie stores the status of a user's consent to the use of various Google services. CONSENT also provides safety measures to protect users from unauthorised attacks.

Expiry date: after 19 years

Name: HSID

Value: AcRwpgUik9Dveht0I

Purpose: This cookie is used to create a profile on your interests. This data helps to display customised ads.

Expiry date: after 2 years

Name: LOGIN_INFO

Value: AFmmF2swRQlhALl6aL...

Purpose: This cookie stores information on your login data.

Expiry date: after 2 years

Name: SAPISID

Value: 7oaPxoG-pZsJuuF5/AnUdDUIsJ9iJz2vdM

Purpose: This cookie identifies your browser and device. It is used to create a profile on your interests.

Expiry date: after 2 years

Name: SID

Value: oQfNKjAsI112024533-

Purpose: This cookie stores your Google Account ID and your last login time, in a digitally signed and encrypted form.

Expiry date: after 2 years

Name: SIDCC

Value: AN0-TYuqub2JOcDTyL

Purpose: This cookie stores information on how you use the website and on what advertisements you may have seen before visiting our website.

Expiry date: after 3 months

10.7.4 How long and where is the data stored?

The data YouTube receive and process on you are stored on Google's servers. Most of these servers are in America. At <https://www.google.com/about/datacenters/locations/?hl=en> you can see where Google's data centres are located. Your data is distributed across the servers. Therefore, the data can be retrieved quicker and is better protected against manipulation.

Google stores collected data for different periods of time. You can delete some data anytime, while other data are automatically deleted after a certain time, and still other

data are stored by Google for a long time. Some data (such as elements on “My activity”, photos, documents or products) that are saved in your Google account are stored until you delete them. Moreover, you can delete some data associated with your device, browser, or app, even if you are not signed into a Google Account.

10.7.5 How can I erase my data or prevent data retention?

Generally, you can delete data manually in your Google account. Furthermore, in 2019 an automatic deletion of location and activity data was introduced. Depending on what you decide on, it deletes stored information either after 3 or 18 months.

Regardless of whether you have a Google account or not, you can set your browser to delete or deactivate cookies placed by Google. These settings vary depending on the browser you use. The following instructions will show how to manage cookies in your browser:

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

If you generally do not want to allow any cookies, you can set your browser to always notify you when a cookie is about to be set. This will enable you to decide to either allow or permit each individual cookie.

10.7.6 Legal basis

If you have consented processing and storage of your data by integrated YouTube elements, this consent is the legal basis for data processing (Art. 6 para. 1 lit. a GDPR). Generally, your data is also stored and processed on the basis of our legitimate interest (Art. 6 para. 1 lit. f GDPR) to maintain fast and good communication with you or other customers and business partners. Nevertheless, we only use integrated YouTube elements if you have given your consent. YouTube also sets cookies in your browser to store data. We therefore recommend you to read our privacy policy on cookies carefully and to take a look at the privacy policy or the cookie policy of the respective service provider.

Youtube (Google) processes data from you, among other things, in the USA. Google is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en.

Additionally, Google uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Google commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses

are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847

Since YouTube is a subsidiary company of Google, Google's privacy statement applies to both. If you want to learn more about how your data is handled, we recommend the privacy policy at <https://policies.google.com/privacy?hl=en>.

11. Additional and further Information

Please also see our [General Privacy Policy](#) for additional and further information.

12. Annex to the privacy policy - data categories

Personal data of applicants:

- Applicant number
- Salutation
- title
- Postgraduate title/title after surname
- First name
- Surname
- Date of Birth
- Citizenship/Nationality
- Sex/gender
- Address (street, house number, postal code, city, country)
- Telephone number
- Alternative phone number
- E-mail address
- Photo
- Education and vocational training
- Work experience



- Curriculum vitae
- Cover letter/motivational letter
- Intended employment/application for position as
- Desired hours (full-time/part-time)
- Desired location
- Desired salary
- Start date of the desired employment/earliest starting date
- Language skills
- Test results, evaluation
- Interview notes
- password
- Applicant source
- Type of application (channel: online, e-mail, etc.)
- Application status
- Remarks
- Application history (date, time, comments)
- Correspondence with the applicant
- Assessment of the extent to which the applicant meets the required specifications
- Assurance of truthfulness of information
- Declaration of consent