

# Privacy policy of MEDWING GmbH

MEDWING GmbH (hereinafter referred to as "MEDWING" or "we") makes every effort to protect your personal data, so please read this data protection declaration carefully.

## 1. General information

MEDWING, a digital career advisor, offers interested parties the opportunity to register by creating a personal user profile and, as a user (hereinafter "user" or "you"), to upload their CV free of charge on the internet website medwing.com (hereinafter "platform") and to indicate their career wishes (hereinafter "search request") with the aim of having:

(a) our career advisors will find for you a job offer, free of charge, corresponding to your expectations at a new employer and present it there for your application (hereinafter referred to as "job placement")

(b) and/or our career consultants provide you with free ongoing tips for optimising your career development (hereinafter "Career Optimisation")

(c) and/or that we employ you in our internal temporary work team and then place you with companies within the framework of temporary employment (hereinafter referred to as "temporary employment").

With this data protection declaration we explain to you in detail the nature, scope and purpose of the collection and use of personal data by MEDWING (Rosenthaler Str. 63, 10119 Berlin, info@medwing.com, Telephone: +4930 202380920, Fax: +4930 577027873) in the course of using our services and our websites (hereinafter also referred to as "offer" or "MEDWING Services").

Personal data is information with the help of which a person can be identified, i.e. information that can be traced back to a person. This includes, for example, name, e-mail address or telephone number. There is data which is already generated due to technical processes when using the Internet and is automatically transmitted to us, and there is data which you enter independently on our platform in order to be able to use all the functions of our MEDWING Services to the full extent. We collect, use and disclose personal data only to the extent permitted by law or with your consent.

## **2. Contact details of the person responsible for processing and of the company data protection officer**

Responsible in the sense of the DSGVO is MEDWING represented by Johannes Roggendorf and Dr. Timo Fischer. MEDWING has appointed a data protection officer.

If you have any questions regarding data protection at MEDWING or if you wish to receive information about the personal data we have stored about you, please contact us by post or

email: MEDWING GmbH - Datenschutz -, Rosenthaler Str. 63, 10119 Berlin

Email: [datenschutz@medwing.com](mailto:datenschutz@medwing.com) - Telephone information is

unfortunately excluded for data protection reasons, as it is not possible to identify you unambiguously by telephone. In order to secure your personal data, we ask you not to use the more insecure e-mail transmission method, but to transmit your personal data by post. Your personal data will be used exclusively for identification purposes and for documentation purposes vis-à-vis the supervisory authorities.

## **3. Collection and storage of personal data and the nature and purpose of their use**

In principle, your personal data will be deleted as soon as they are no longer required to achieve the purpose for which they were collected. Insofar as legal retention periods apply to us, we store the data until their expiry.

### **a) When visiting the website**

When you visit our website [medwing.com](http://medwing.com) or [clients.medwing.com](http://clients.medwing.com), the browser used on your terminal device automatically sends information to the server of our website. This information is temporarily stored in a so-called log file. The following information is collected without your intervention and stored until it is automatically deleted:

IP address of the requesting computer,

Date and time of access,

Name and URL of the retrieved file,

Website from which access is made (referrer URL),

the browser used and, if applicable, the operating system of your computer as well as the name of your access provider.

The data mentioned will be processed by us for the following purposes:

Ensuring a smooth connection of the website,



To ensure a comfortable use of our website,  
Evaluation of system safety and stability as well as  
for other administrative purposes

The legal basis for data processing is Art. 6 Para. 1 S. 1 lit. f DSGVO. Our legitimate interest follows from the purposes listed above for the collection of data. Under no circumstances do we use the collected data for the purpose of drawing conclusions about your person.

In addition, when you visit our website, we use cookies, analysis and automation services, social media plug-ins if necessary and integrate third-party services. You will find more detailed explanations on this under points 5, 6, 7 and 8 of this data protection declaration.

We also save the date of your last visit as part of your account (e.g. when you register, log in, change your profile or click on links). The legal basis for this data processing is Art. 6 Para. 1 S. 1 lit. b DSGVO.

#### b) When using our contact forms

If you have any questions, we offer you the possibility to contact us via a form provided on the website. We require a valid e-mail address, telephone number and name so that we know who sent the request and can respond to it. Further information can be provided voluntarily.

Data processing for the purpose of contacting us is carried out in accordance with Art. 6 Para. 1 S. 1 lit. a DSGVO on the basis of your voluntary consent.

The personal data collected by us for the use of the contact form will be automatically deleted after you have completed your request.

#### c) When using our MEDWING Services

If you would like to use our MEDWING Services, we will conclude a contract with you for the use of the platform (hereinafter referred to as "platform contract"). We collect, use and process certain personal data from you in order to substantiate and implement the contract.

The data from your account will be stored as long as the platform contract has not been terminated. The personal data collected by us for the use of our MEDWING Services will be automatically deleted after termination of the platform contract. Upon termination of the platform contract, we will block your account. We will delete your account and all personal data at the latest six (6) months after termination of the contract. This does not apply if we still need the relevant data to enforce claims against you or if we are legally or contractually obliged to store the data. If user data are not deleted in order to comply with contractual or legal obligations, their processing will be restricted. The data will be blocked accordingly and not processed for other purposes. This applies, for example, to user data that must be stored for commercial or tax reasons.

#### (1) On registration

On order to use our MEDWING Services, you must first register with us on the platform. To do this, you must open an account and enter your e-mail address, telephone number, name, form of address (gender) and your address. You complete the registration process by entering a password for your account. We store this data for the duration of the platform contract and assign it to your account.

Data processing for the purpose of registration on our platform and thus its use takes place within the framework of the platform contract on the basis of Art. 6 Para. 1 S. 1 lit. b DSGVO.

#### (2) When completing the applicant's profile

In order to make the best possible use of the services offered by MEDWING, you can at any time supplement your profile information on the platform in the electronic forms provided for your account with further personal details, in particular you can create a curriculum vitae and upload a profile picture and certificates. This data is also stored by us for the duration of the platform contract.

Data processing for the purpose of completing your applicant profile on our platform and thus preparing the presentation of your applicant profile takes place within the framework of the platform contract on the basis of Art. 6 Para. 1 S. 1 lit. b DSGVO.

#### (3) Analysis and presentation of suitable positions

We use and process your personal data, i.e. your address, curriculum vitae and search request, on the basis of mathematical-statistical procedures (so-called scoring) in order to identify suitable positions for you and to introduce them to you.

We will introduce suitable positions by e-mail, telephone or text message/SMS and/or in your personal user area on the platform.

Data processing for the purpose of analysing and presenting suitable positions is carried out within the framework of the platform contract on the basis of Art. 6 Para. 1 S. 1 lit. b DSGVO.

#### (4) Tips for career optimisation

In order to provide you with tips for career optimisation and also to increase the quality of the jobs presented to you, we use and process your pseudonymised personal data, i.e. your address, your CV and search order within the framework of mathematical-statistical procedures, algorithms and profiling.

You will receive these tailor-made tips from us by e-mail and/or in your personal user area on the platform.

Data processing for the purpose of career optimisation and the introduction of suitable positions and tailored tips is carried out within the framework of the platform contract on the basis of Art. 6 Para. 1 S. 1 lit. b DSGVO.

#### (5) Opinion research to improve our services

In order to continuously improve our MEDWING Services, we occasionally conduct surveys, e.g. to obtain direct feedback on our service quality after successful or unsuccessful placement/application or to gain insight into current market trends in order to generate better job suggestions or better career optimisation tips.

You will receive invitations to these surveys from us by e-mail and/or in your personal user area on the platform.

The legal basis for this data processing is Art. 6 Para. 1 S. 1 lit. b DSGVO within the framework of the platform contract.

#### d) For e-mail contact

Due to legal regulations, this website contains information that enables quick electronic contact and direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If you contact us by e-mail, we store the

personal data you provide to us to process your enquiry and in the event that follow-up questions arise. We process such personal data voluntarily transmitted by you to us on the basis of our legitimate interest in communicating with you, Art. 6 Para. 1 S. 1 lit. f DSGVO. This personal data will not be passed on to third parties.

#### **4. Data transfer**

##### a) When using our MEDWING Services

In order to carry out our MEDWING Services job placement, we present personal data, your name, e-mail address, telephone number and your curriculum vitae, if necessary with pictures, to companies that offer jobs that match your applicant profile. Such a passing on takes place always only in arrangement with you.

Only if you decide to introduce yourself to a particular company will we act as your agent on your behalf and transfer the personal data required to present your applicant profile to the company you have selected. When using this service, personal data may be transmitted to the company in unencrypted form, e.g. by e-mail.

In order to be able to check in detail whether your profile actually matches a job before we present your applicant profile in consultation with you, your pseudonymised applicant profile can be made available in anonymised form to a company with suitable positions for the purpose of comparison without any possibility of tracing back your person

This data processing for the purpose of presenting suitable positions is carried out in accordance with Art. 6 Para. 1 S. 1 lit. b DSGVO within the framework of the platform contract.

Your personal data will only be used by the company that offers jobs that match your applicant profile within the framework of the application process and will be deleted after completion

## b) Otherwise

In addition, your personal data will not be transferred to third parties for purposes other than those listed below.

We will only pass on your personal data to third parties if:

You have given your express consent to this pursuant to Art. 6 para. 1 sentence 1 lit. a DSGVO, the disclosure pursuant to Art. 6 para. 1 sentence 1 lit. f DSGVO is necessary for the assertion, exercise or defence of legal claims and there is no reason to assume that you have an overriding legitimate interest in not disclosing your data, in the event that there is a legal obligation to pass on data pursuant to Art. 6 para. 1 sentence 1 lit. c DSGVO, and this is legally permissible and necessary for the execution of contractual relationships with you pursuant to Art. 6 para. 1 sentence 1 lit. b DSGVO.

## 5. Cookies

We use cookies on our site. These are small files that are automatically created by your browser and stored on your device (laptop, tablet, smartphone, etc.) when you visit our site. Cookies do not cause any damage to your terminal device and do not contain viruses, Trojans or other malware.

Information is stored in the cookie, which results in each case in connection with the specifically used terminal device. This does not mean, however, that we will immediately become aware of your identity.

The use of cookies serves on the one hand to make the use of our offer more pleasant for you. For example, we use so-called session cookies to recognise that you have already visited individual pages on our website. These are automatically deleted after leaving our site.

In addition, we also use temporary cookies to optimise user-friendliness, which are stored on your terminal for a specific period of time. If you visit our site again to make use of our services, it is automatically recognized that you have already been with us and which inputs and settings you have made so that you do not have to enter them again.

On the other hand, we use cookies to record the use of our website statistically and to evaluate it for the purpose of optimising our offer for you (see point 6). These cookies enable us to automatically recognize that you have already visited our site when you visit it again. These cookies are automatically deleted after a defined period of time.

The data processed by cookies are necessary for the purposes mentioned to safeguard our legitimate interests and those of third parties pursuant to Art. 6 Para. 1 S. 1 lit. f DSGVO.

Most browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your computer or a message always appears before a new cookie is created. The complete deactivation of cookies may, however, result in you not being able to use all the functions of our website.

## 6. Tracking, analysis and automation tools

The tracking, analysis and automation measures listed below and used by us are carried out on the basis of Art. 6 para. 1 sentence 1 lit. f DSGVO. With the measures we apply, we want to ensure that our services are designed to meet requirements, that they are efficient and that they are continually optimised. On the other hand, we use the measures mentioned to statistically record the use of our offer and to evaluate it for you for the purpose of optimising our offer. These interests are to be regarded as justified within the meaning of the aforementioned provision.

The respective data processing purposes and data categories can be found in the corresponding tools.

### a) Google Analytics

We use Google Analytics, a web analysis service provided by Google Inc., for the purpose of tailoring our pages to meet your needs and continuously optimising them. (<https://www.google.de/intl/de/about/>) (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter referred to as "Google"). In this context, pseudonymised user profiles are created and cookies (see section 4) are used. The information generated by the cookie about your use of this website such as



"Browser type/version,  
operating system used,  
Referrer URL (the previously visited page),  
Host name of the accessing computer (IP address),  
time of the server request,"

are transferred to a Google server in the USA and stored there. This information is used to evaluate the use of the website, to compile reports on website activity and to provide other services relating to website activity and internet usage for market research purposes and to tailor these internet pages to meet requirements. This information may also be transferred to third parties if this is required by law or if third parties process this data on behalf of third parties. Under no circumstances will your IP address be merged with other Google data. The IP addresses are anonymised so that an allocation is not possible (IP masking).

On our behalf as operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide other services related to website activity and internet usage to the website operator. The data sent by us and linked to cookies, user identifications (e.g. user ID) or advertising IDs are automatically deleted after 14 months.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=de>).

As an alternative to the browser add-on, in particular for browsers on mobile devices, you can also prevent the collection by Google Analytics by using this link: <https://tools.google.com/dlpage/gaoptout> . An opt-out cookie is set to prevent your information from being collected in the future when you visit this website. The opt-out cookie applies only to this browser and only to our website and is stored on your device. If you delete the cookies in this browser, you must set the opt-out cookie again. We also use Google Analytics to evaluate data from Adwords for statistical purposes. If you do

not wish this to happen, you can deactivate it via the Advertisement Preferences Manager (<https://adssettings.google.com/authenticated>).

Further information on data protection in connection with Google Analytics can be found in the Google Analytics help (<https://support.google.com/analytics/answer/6004245?hl=de>).

#### b) Google Adwords Conversion Tracking

"We also use Google Conversion Tracking to record the use of our website statistically and to evaluate it for the purpose of optimising our website for you. Google Adwords places a cookie (see number 4) on your computer if you have reached our website via a Google advertisement.

These cookies lose their validity after 30 days and are not used for personal identification. If the user visits certain pages on the AdWords customer's website and the cookie has not expired, Google and the customer will be able to tell that the user clicked on the ad and was directed to that page.

Each Adwords customer receives a different cookie. Cookies can therefore not be traced via the websites of Adwords customers. The information collected using the conversion cookie is used to generate conversion statistics for Adwords customers who have opted for conversion tracking. Adwords customers will know the total number of users who clicked on their ad and were directed to a page with a conversion tracking tag. However, you will not receive any information that personally identifies users.

If you do not wish to participate in the tracking process, you can also refuse to set a cookie as required, for example by setting your browser to disable the automatic setting of cookies. You can also deactivate cookies for conversion tracking by setting your browser to block cookies from the domain ""www.googleadservices.com"". Google's Privacy Policy for Conversion Tracking can be found here (<https://services.google.com/sitestats/de.html>)."

#### c) Google Tag Manager

Our offer uses the Google Tag Manager of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google"). This is where we manage the various analysis and tracking services. The Google Tag Manager only implements tags. This means that no cookies are used and no personal data is collected. The Google Tag Manager triggers other tags, which in turn may collect data. However, the Google Tag Manager does not access this data. If a deactivation has been made at domain or cookie level, it will remain for all tracking tags if they are implemented with the Google Tag Manager. More information about the Google Tag Manager can be found at: <http://www.google.de/tagmanager/faq> and <http://www.google.de/tagmanager/use-policy.html>

#### d) Google Remarketing

We use the remarketing function of Google Inc. This function is used to present you with interest-related advertisements within the Google advertising network. Your browser stores cookies (see Section 4) when it visits websites that are part of Google's advertising network. Such pages may then present advertisements to you that relate to content you have previously viewed on websites that use Google's remarketing feature. Google claims not to collect any personally identifiable information during this process. However, if you do not want Google's remarketing function to work, you can always deactivate it by making the appropriate settings at <http://www.google.com/settings/ads> . Alternatively, you can deactivate the use of cookies for interest-related advertising via the advertising network initiative by following the instructions at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) . For more information about Google Remarketing and Google's privacy policy, please visit: <http://www.google.com/privacy/ads/>

#### e) Bing Ads

In our offer we use the conversion tracking "Bing Ads" of Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA). Microsoft will set a cookie (see 4) on your computer if you have reached our website via a Microsoft Bing advertisement. In this way, Microsoft and we can recognise that someone clicked on an advertisement, was redirected to our website and reached a previously determined target page (conversion page). We will only know the total number of users who clicked on a Bing ad and were redirected to the Conversion page. No personal information about the user's identity is shared. The information collected is transferred to Microsoft servers in the USA and stored there for a maximum of 180 days. If you do not wish to participate in the tracking procedure, you can also refuse to set a cookie as required for this purpose - for example by using a browser setting that generally deactivates the automatic setting of cookies. In addition, Microsoft may use cross-device tracking to track your usage patterns across multiple electronic devices, enabling it to display personalised advertisements on Microsoft Web sites and apps. You can disable this behavior at <http://choice.microsoft.com/de-de/opt-out> For more information about Microsoft Bing Ads' privacy practices and cookies, please visit the Microsoft Web site at <https://www.microsoft.com/de-en/privacystatement/default.aspx>.

#### f) Facebook Ads

In our offer we use the function "Custom Audiences" of Facebook Inc. ("Facebook"). This function is used to display interest-based advertising to users of our website when they visit the Facebook social network. For this purpose, we have implemented the Facebook pixel on this website. This pixel is used to connect to the Facebook servers when you visit our website. This will tell Facebook that you have visited our website. Facebook associates this information with your Facebook account. The Facebook pixel allows us to measure, evaluate and optimise the effectiveness of Facebook ads for statistical and market research purposes. We only receive anonymous reports from Facebook, i.e. we do not receive any personal data from individual users. Further information on the collection and use of the data by Facebook as well as on your rights in this regard and possibilities for the protection of your privacy can be found in the data protection information of Facebook <https://www.facebook.com/about/privacy/>. You can revoke your consent to the use of the "Custom Audiences" function and the associated use of the Facebook pixel at any time with effect for the future by following this link [https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/).

To do this, you must be logged in to Facebook. You have the option of prohibiting Facebook and its partners from placing advertisements. You can edit the settings for Facebook advertisements under the following link: [https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/).

#### g) Twitter Ads

Our website also uses the remarketing function of Twitter (Twitter Inc., 1355 Market Street Suite 900, San Francisco, CA 94103, USA). The Twitter remarketing feature allows us to target visitors to our website with Twitter advertisements based on their interests. Twitter uses so-called "tags" for this purpose. This tag is used to record visits to the website as well as data on the use of the website. When a user visits a website that contains such a tag, Twitter places a cookie (see 4) in the user's browser. The unique ID of this cookie is recorded and it is included in the target audience for remarketing on Twitter. If you visit Twitter below, you will be shown advertisements based on your interests. Personal data is not collected or stored by you and is therefore not identifiable to us on Twitter. If you do not want Twitter to address you with targeted advertising, you can deactivate this function on Twitter at <https://support.twitter.com/articles/20171528> In addition, Twitter supports the option "Do Not Track (DNT)". You can activate this at: <https://support.twitter.com/articles/20171372> If you have activated the DNT option in your browser, Twitter does not map your account to browser-related information in order to place tailor-made ads for you. For more information about Twitter privacy and Twitter ads, please visit <https://business.twitter.com/de/help/troubleshooting/how-twitter-ads-work.html>.

#### h) LinkedIn Ads

We use LinkedIn's analysis and conversion tracking technology on our website. The platform is offered by LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2 (Ireland). LinkedIn's technology allows you to view more relevant advertising tailored to your interests. LinkedIn also sends us aggregated and anonymous reports of ad activity and information on how you interact with our website. LinkedIn uses cookies (see Section 4) for this purpose. These cookies are used to uniquely identify a web browser on a particular device, are valid for 30 days, and do not contain any personally identifiable information.

They are therefore not used for the personal identification of our website users. The cookie is used to analyse how you interact with our website (e.g. which website brought you to us, how long you stayed, what offers you were interested in) and whether or not you are a member of the LinkedIn platform. The information collected through the cookie is used to compile the aforementioned anonymous statistics and reports and to play advertisements based on your interests. For more information about LinkedIn's privacy practices, please visit <https://www.linkedin.com/legal/privacy-policy#choices-oblig>. Whether you are a registered member of the LinkedIn platform or not, you may opt-out of LinkedIn's analysis of your usage patterns and display of interest-based recommendations by clicking the "Opt-out" button (for LinkedIn members) or "Opt-out" (for other users) at the following link: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>. We would like to point out that rejecting such advertisements does not remove ads from the pages you visit. It simply means that the advertisements shown to you are not necessarily tailored to your personal interests.

#### i) Outbrain

On our website we use the technology of the supplier Outbrain UK Ltd. ("Outbrain"). This technology enables us to alert you to other content within our website or to third party websites that may be of interest to you through the use of cookies (see paragraph 4) stored on your computer/device. Outbrain's integrated recommendations are determined based on the content you have read. The content is technically controlled and delivered automatically by Outbrain. The display is on a pseudonymous basis. Personal data is not stored here. The cookie uses information about the device source, browser type and your IP address, which has been completely anonymized by removing the last octet, to select suitable content. Further information on Outbrain's data protection can be found at <http://outbrain.com/legal/privacy>. You may object to Outbrain's tracking of interest-based recommendations via the "Opt-out" field (see item 4 " Advertising/Behavioral Targeting; How To Opt-Out.) within Outbrain's Privacy Policy at any time. Please note that you must set the opt-out separately in each device you use to access our websites. If you object, you will continue to be offered interesting additional content; however, this will no longer be based on your previous usage behaviour on our websites.

#### j) Taboola

Our website uses technologies from Taboola Inc. (28 West 23rd St. 5th fl., New York, NY 10010, [www.taboola.com](http://www.taboola.com), "Taboola"). Taboola uses cookies (see paragraph 4) to determine what content you use and which of our pages you visit. The cookie enables us to create pseudonymous usage profiles by collecting device-related data and log data and to recommend content that matches your personal interests. This enables us to tailor our services to your individual needs. These usage profiles do not allow any conclusions to be drawn about your person. Further information about Taboola and the possibility to deactivate the Taboola cookie can be found at <https://www.taboola.com/privacy-policy> (OptOut information can be found under "Site Visitor Choices").

#### k) New Relic

We use the web analysis service "New Relic" of the provider New Relic Inc., 188 Spear Street, Suite 1200, San Francisco, CA 94105, USA, to monitor the availability and performance of our servers. Using pseudonymous usage profiles (which do not contain any personal data), technical performance data (e.g. response and loading times) is measured and analyzed to improve our server performance. Further details and information on New Relic's specific privacy policy can be found at <https://newrelic.com/privacy>.

#### l) Rollbar

We use the Rollbar service (Rollbar, 51 Federal Street, San Francisco, CA 94107, USA) to improve the technical stability of our services by monitoring system stability and identifying code errors from our log files (see paragraph 3). Rollbar serves these purposes alone and does not evaluate data for advertising purposes. For further information, please refer to Rollbar's privacy policy: <https://rollbar.com/privacy/>

#### o) Intercom

You can also interact with us via a live chat on our website so that we can answer your questions even faster. For this purpose we use the Intercom service of Intercom Inc. 55 2nd Street, 4th Fl., San Francisco, CA 94105, USA. Intercom serves these purposes alone and does not evaluate any data for advertising purposes.

We transmit your e-mail address and name to Intercom as personal data so that we can contact you and keep you informed about answers. For more information about Intercom's privacy policy, please visit: <http://docs.intercom.io/privacy>

## 7. Social Media Plug-ins

We may use social plug-ins of the social networks Facebook, Twitter, Instagram, LinkedIn and Xing on our website on the basis of Art. 6 Para. 1 S. 1 lit. f DSGVO in order to make our company better known. The advertising purpose behind this is to be regarded as a legitimate interest within the meaning of the DSGVO. The responsibility for the data protection-compliant operation is to be guaranteed by their respective providers. The integration of these plug-ins by us takes place in the way of the so-called two-click method in order to protect visitors of our platform in the best possible way.

### a) Facebook

"Social media plugins from Facebook are used on our platform to make their use more personal. For this we use the ""LIKE"" or ""SHARE"" button. This is an offer from Facebook.

If you call up a page on our website that contains such a plugin, your browser establishes a direct connection with the Facebook servers. The content of the plugin is transmitted directly from Facebook to your browser, which integrates it into the website.

By integrating the plugins, Facebook receives the information that your browser has accessed the corresponding page of our website, even if you do not have a Facebook account or are not currently logged on to Facebook. This information (including your IP address) is transmitted directly from your browser to a Facebook server in the USA and stored there.

If you are logged in to Facebook, Facebook can directly assign your visit to our platform to your Facebook account. If you interact with the plugins, for example by pressing the ""LIKE"" or ""SHARE"" button, the corresponding information is also transmitted directly to a Facebook server and stored there. The information is also published on Facebook and displayed to your Facebook friends.



Facebook may use this information for the purposes of advertising, market research and tailoring Facebook Pages to your needs. Facebook creates usage, interest and relationship profiles for this purpose, e.g. to evaluate your use of our platform with regard to the advertisements displayed to you on Facebook, to inform other Facebook users about your activities on our platform and to provide other services associated with the use of Facebook.

If you do not want Facebook to associate the information collected through our website with your Facebook account, you must log out of Facebook before visiting our platform.

The purpose and scope of the data collection and the further processing and use of the data by Facebook as well as your rights in this regard and setting options to protect your privacy can be found in Facebook's data protection information (<https://www.facebook.com/about/privacy/>).

#### b) Twitter

"On our internet pages you will find plugins of the Twitter Inc. (Twitter) are integrated. You can recognise the Twitter plugins (tweet button) by the Twitter logo on our site. An overview of tweet buttons can be found at (<https://about.twitter.com/resources/buttons>).

If you access a page on our website that contains such a plugin, a direct connection will be established between your browser and the Twitter server. Twitter receives the information that you have visited our site with your IP address. If you click the Twitter "tweet" button while logged into your Twitter account, you can link the content of our pages to your Twitter profile.

This allows Twitter to assign the visit to our pages to your user account. We would like to point out that, as the provider of the pages, we do not have any knowledge of the content of the data transmitted or its use by Twitter.

If you do not want Twitter to be able to assign visits to our pages, please log out of your Twitter user account.

Further information on this can be found in Twitter's privacy policy (<https://twitter.com/privacy>).

#### c) Instagram

"Our platform also uses social plugins ("plugins") from Instagram, operated by Instagram LLC, 1601 Willow Road, Menlo Park, CA 94025, USA ("Instagram"). The plugins are marked with an Instagram logo, for example in the form of an "Instagram camera".

When you visit a page on our website that contains such a plugin, your browser connects directly to Instagram's servers. Instagram sends the content of the plugin directly to your browser and integrates it into the page. This integration tells Instagram that your browser has accessed the appropriate page on our site, even if you do not have an Instagram profile or are not logged into Instagram.

This information (including your IP address) is transferred directly from your browser to an Instagram server in the USA and stored there. If you are logged in to Instagram, Instagram can directly associate your visit to our platform with your Instagram account. If you interact with the plugins, for example by pressing the "Instagram" button, this information will also be sent directly to a Instagram server and stored there.

The information is also published to your Instagram account and displayed to your contacts.

If you do not want Instagram to directly associate the data collected via our website with your Instagram account, you must log out of Instagram before visiting our platform.

For more information, see Instagram's Privacy Policy (<https://help.instagram.com/155833707900388>).

#### d) LinkedIn

"Our platform also uses so-called social plugins ("plugins") from LinkedIn, which is operated by LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2 (Ireland).

The plugins are marked with a LinkedIn logo, for example in the form of an "in". If you access a page on our website that contains such a plugin, your browser will establish a direct connection to LinkedIn's servers. The content of the plugin is transmitted by LinkedIn directly to your browser and integrated into the page. Through this integration, LinkedIn receives the information that your browser has called the corresponding page of our website, even if you do not have a LinkedIn profile or are not currently logged in to LinkedIn.



This information (including your IP address) is transmitted directly from your browser to a LinkedIn server in the USA and stored there. If you are logged in to LinkedIn, LinkedIn can assign your visit to our platform directly to your LinkedIn account. If you interact with the plugins, for example by pressing the "LinkedIn" button, this information is also transmitted directly to a LinkedIn server and stored there.

The information is also published on your LinkedIn account and displayed to your contacts there.

If you do not want LinkedIn to assign the data collected via our website directly to your LinkedIn account, you must log out of LinkedIn before visiting our platform.

Please see LinkedIn's Privacy Policy (<https://www.linkedin.com/legal/privacy-policy>) for more information."

e) Xing

"Our platform also uses so-called social plugins ("plugins") from Xing, which are operated by XING SE, Dammtorstraße 30, 20354 Hamburg, Germany.

The plugins are marked with an Xing logo, for example in the form of an "X". If you call up a page on our website that contains such a plugin, your browser establishes a direct connection to Xing's servers. The content of the plugin is transmitted by Xing directly to your browser and integrated into the page. Through this integration, Xing receives the information that your browser has called the corresponding page of our website, even if you do not have an Xing profile or are not currently logged in to Xing.

This information is transmitted directly from your browser to an Xing server. XING does not store any personal data about you when you access this website. In particular, XING does not store any IP addresses. Nor is there any evaluation of your usage behavior regarding the use of cookies in connection with the "XING Share Button". If you are logged in to Xing, Xing can assign your visit to our platform directly to your Xing account. If you interact with the plugins, for example by pressing the "Xing" button, this information is also transmitted directly to an Xing server and stored there.

The information is also published on your Xing account and displayed to your contacts there.

If you do not want Xing to assign the data collected via our website directly to your Xing account, you must log out of Xing before visiting our platform.

You can access the latest data protection information on the ""XING Share Button"" and additional information on this website: [https://www.xing.com/app/share?op=data\\_protection](https://www.xing.com/app/share?op=data_protection)

## 8. integration of services and contents of third parties

We may use on our website content provided by third parties, such as videos on YouTube or map material from Google Maps (hereinafter "plug-ins"), on the basis of Art. 6 para. 1 sentence 1 lit. f DSGVO:

### a) Google Maps

"On our platform, map material is provided by Google Maps, which is operated by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"), in order to geographically represent potential employers to you and to make it easier for you to find a suitable job.

These plugins are marked with a Google logo in a map section.

If you call up a page on our website that contains such a plugin, your browser establishes a direct connection to Google's servers. The content of the plugin is transmitted by Google directly to your browser and integrated into the page. By this integration Google receives the information that your browser has called the corresponding page of our platform.

This information (including your IP address) is transmitted by your browser directly to a Google server in the USA in order to establish the connection there and save it there. Google, for its part, warrants that it will comply with the basic data protection regulation in all its cloud services.

For more information, please see Google's Privacy Policy (<https://policies.google.com/privacy>).

### b) YouTube

"Our platform may also use videos provided by YouTube, which is operated by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google", or "YouTube").

The plugins are marked with a YouTube logo, for example in the form of a "red YouTube TV with play button".

If you access a page of our website that contains such a plugin, your browser establishes a direct connection to YouTube's servers. The content of the plugin is transmitted by Google directly to your browser and integrated into the page. This integration tells Instagram that your browser has visited the appropriate page on our site, even if you do not have a YouTube profile or are not currently logged into YouTube.

This information (including your IP address) is transmitted directly from your browser to a Google server in the USA and stored there. If you are logged in to YouTube, YouTube can assign your visit to our platform directly to your YouTube account. If you interact with the plugins, for example by clicking the "Like" button, this information is also transmitted directly to a Google server and stored there.

The information is also published on your YouTube account and displayed to your contacts there.

If you do not want Google to assign the data collected via our website directly to your YouTube account, you must log out of YouTube before visiting our platform. For your protection, we do not load the video from YouTube until you click the Play button.

Please see Google's Privacy Policy (<https://policies.google.com/privacy>) for more information."

## 9. Rights of affected persons

You have the right:

to request information about your personal data processed by us at any time in accordance with Art. 15 DSGVO. In particular, you can request information on the processing purposes, the category of personal data, the categories of recipients to whom your data has been or will be disclosed. The planned storage period, the existence of a right to rectification, deletion, restriction of processing or objection, the existence of a right of complaint, the origin of your data if it has not been collected from us. As well as the existence of automated decision-making including profiling and, if

applicable, the existence of a data protection law. If personal data are transferred to a third country or to an international organisation, you have the right to be informed of the appropriate safeguards pursuant to Art. 46 DSGVO in connection with the transfer. In accordance with Art. 16 DSGVO, you have the right to demand the immediate correction of incorrect or incomplete personal data stored by us; to demand the deletion of your personal data stored by us in accordance with Art. 17 DSGVO. Unless processing is necessary for the exercise of the right to freedom of expression and information, for the fulfilment of a legal obligation, for reasons of public interest or for the assertion, exercise or defence of legal claims;

to demand the restriction of the processing of your personal data in accordance with Art. 18 DSGVO if the correctness of the data is disputed by you, the processing is unlawful but you refuse its deletion and we no longer need the data but you need it to assert, exercise or defend legal claims or you have lodged an objection against the processing in accordance with Art. 21 DSGVO.

In accordance with Art. 20 DSGVO, to receive your personal data which you have provided to us in a structured, common and machine-readable format or to request the transfer to another responsible person;

"in accordance with Art. 7 para. 3 DSGVO, to revoke your consent once given to us at any time. The consequence of this is that we may no longer continue the data processing based on this consent in the future.

not to be subject to any decision based solely on automated processing, including profiling, that will have legal effect against you or similarly significantly affect you".

"to complain to a supervisory authority pursuant to Art. 77 DSGVO. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our company headquarters in Berlin.

If you wish to assert these rights, please send your enquiry by e-mail or post to the address stated in point 1, clearly identifying yourself."

## **10. Right of objection**

If your personal data is processed on the basis of legitimate interests pursuant to Art. 6 para. 1 sentence 1 lit. f DSGVO, you have the right to object to the processing of your personal data pursuant to Art. 21 DSGVO. If there are reasons for doing so which arise from your particular situation or if the objection is directed against direct advertising; this also applies to profiling based on these provisions.

In the latter case, you have a general right of objection, which is implemented by us without stating a particular situation. We no longer process personal data unless we can prove compelling reasons for processing worthy of protection which outweigh your interests, rights and freedoms, the processing serves the assertion, exercise or defence of legal claims.

If you wish to make use of your right of revocation or objection, please send your enquiry by e-mail or post to the address stated in section 1, clearly identifying yourself.

## **11. Data security**

Within the platform visit, we use the common SSL (Secure Socket Layer) procedure in conjunction with the highest level of encryption supported by your browser. As a rule, this is a 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. You can tell whether an individual page of our website is transmitted in encrypted form by the closed representation of the key or lock symbol in the lower status bar of your browser.

We also use suitable technical and organisational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorised access by third parties. Our security measures are continuously improved in line with technological developments.

## **12. Topicality and change of this data security explanation**

This privacy policy is currently valid and as of May 2018.

As a result of the further development of our platform and the services it offers, or due to changes in legal or official requirements, it may be necessary to amend this data protection declaration. We therefore reserve the right to change this data protection declaration. You can call up and print out the current data protection declaration at any time on our website at <https://medwing.com/DE/en/privacy/>

## **Further information on registration and data processing**

"What do we offer you?"



MEDWING GmbH offers you the possibility to use all services free of charge on the website [medwing.com](http://medwing.com) after creating a personal user profile (user account).

If you register as a user (see below) and deposit your CV with us, we will start to search for you free of charge for job offers that match your search criteria and introduce them to you; whether you are interested in temporary work/employee leasing or at other companies that offer suitable jobs. This will save you a lot of tedious application processes and you will find your dream job with little effort.

In addition, MEDWING gives you tips for job interviews and observation and supports you in getting your dream job.

Users can remove their personal data from their user account at MEDWING GmbH at any time without any prerequisites. All data will be deleted from the servers of MEDWING GmbH. The complete deletion also takes place if the users delete their personal user accounts with MEDWING GmbH.

In addition to this offer, MEDWING GmbH provides comprehensive information and tips tailored to your career optimisation in order to continually promote your personal development opportunities.

Data of our users will not be sold or used for purposes other than the provision of our services. Only if you would like us to introduce you to a job, will we pass on your applicant profile to the company in question."

How is your data used?

The stored data is used within the framework of the services offered by MEDWING GmbH:

#### 1) Job placement and employee leasing

"In order to identify suitable job offers, we process the personal data of the user, i.e. address and CV and search preferences on the basis of mathematical-statistical procedures (so-called scoring).

We present suitable job offers to users at the email address or telephone number provided during registration and discuss the next steps. If the user ultimately wishes to be presented for a suitable position at the offering company, we will forward his/her applicant profile to the company on behalf of the user. If necessary, personal data will be transmitted unencrypted by e-mail.





The personal data of the users will only be processed by the company for the purposes of the application process and deleted after completion of the application process. After an application process, we collect feedback from the user by e-mail in order to improve our processes."

## 2) Career optimisation

Within the framework of career optimisation, we use and process the personal data of users to determine and present individual career tips. Using software or an algorithm, we use and process the personal data provided during registration and when supplementing the user profile, as well as the CV and search preferences, in order to provide tips that are individually tailored to the user's career preferences (e.g. meaningful further training, next career steps, or relevant market trends). Users receive these tips and development suggestions from us at the e-mail address or telephone number provided and/or in their personal user area on the platform. In order to further improve the quality of career optimisation tips, we regularly conduct anonymous surveys on current market trends by e-mail.