

# Recruitment Privacy Policy

## 1. Company information

Smartmile Deutschland GmbH  
Gottlieb-Daimler-Str. 18/1, 72202 Nagold, Germany  
Tel. +49 7452 63540 0  
kundenservice@smartmile.eu

## 2. Contact Person

Steffen Luippold, Gottlieb-Daimler-Str. 18/1, 72202 Nagold, Germany, Tel. +49 7452 63540 0,  
privacy\_de@smartmile.eu

## 3. Use of Data

### 3.1. Use of data to process your job application

In order to process your job application for one of the Smartmile group companies (see 7.) we, Smartmile Deutschland GmbH as well as our parent company Smart Mile Solutions B.V., Rijksstraatweg 68, NL-3454JD Utrecht, Netherlands, its subsidiaries and affiliated companies in the network of companies of Smart Mile Solutions B.V., (hereinafter together referred to as "Smartmile"), need personal information of our applicants to the extent stated in paragraph 4 of this policy. This information, which is required in the application process, is necessary for processing your job application and for a possible job contract with you. We store and use your data for the stated purposes. This privacy policy only relates to the processing of personal data of job applicants and personal data in connection with the submission of a job application to Smartmile.

For the application process at <https://smartmile.breezy.hr> we are using breezy.hr, a software product of Breezy HR, Inc., Jacksonville, FL 32207, United States of America (hereinafter referred to as "platform operator"). The processing of data at this platform is subject to the platform operator's terms and privacy policy, also the use of external analytics and optimization software for the website <https://smartmile.breezy.hr> is under sole control of the platform operator.

### 3.2. Use of data for talent pool

If we are unable to offer you the desired position, we add your application to our talent pool, to be able to offer you another position at a later date. If you consent to this submission your data will be stored, processed and forwarded to all Smartmile group companies.

### 3.3. Analytics, optimization and external software providers

We use different external analytics, optimization and service applications in order to provide and improve our service. Most of these services do use so-called "cookies" and you can find further information on cookies under section 6, also information on how to prevent the storage of cookies. Any possibly needed data transfer is conducted strictly observing due protective policies, sufficient security, and only to extent necessary to provide the Smartmile service, and on basis of a written agreement in compliance with applicable legal requirements. The EU-U.S. Privacy Shield Framework provides EU and US companies with a mechanism to comply with data protection requirements when transferring personal data from the European Union to the United States. All external software providers of Smartmile that are located in the US are part of the Privacy Shield Framework to ensure highest standards of protection of your personal data.

	Provider	Purpose	Data collected / processed	Cookies	Web beacons	Data stored and processed
Breezy HR	Breezy HR, Inc. 1450 Flagler Avenue, Suite 24, Jacksonville, FL 32207, USA	Processing of job applications, candidate sourcing	personal and job related information, provided by the job applicant during the application process IP address	yes	no	USA
	Privacy policy	<a href="https://breezy.hr/privacy">https://breezy.hr/privacy</a>				
	Privacy Shield Supervision	<a href="https://www.bbb.org/EU-privacy-shield/for-eu-consumers">https://www.bbb.org/EU-privacy-shield/for-eu-consumers</a>				
	Remarks	The use of external analytics (like e.g. Google Analytics) and optimization software for the website <a href="https://smartmile.breezy.hr">https://smartmile.breezy.hr</a> is under sole control of the platform operator Breezy HR.				

#### 4. What data we collect

- name
- contact information
  - o postal address, e-mail address, phone number
- gender (optional)
- date of birth
- skills and work experience
- job application related questions (information provided during the application process by you)
- for security reasons: IP addresses (from which accounts have been accessed / created)

#### 5. Where we collect data

We collect data from our job applications when the applicants applies for a position at <https://smartmile.breezy.hr> and might ask for additional information via e-mail.

#### 6. Cookies and web beacons

##### 6.1. Cookies

When you visit our website, small files, called cookies, are stored on your computer. These serve to make our offer more user-friendly and safer. Most of these cookies are temporary, so-called "session cookies" and will be deleted after the end of the visit of our website. Others will remain on your computer until you delete them. Such cookies are used to recognize your browser the next time you visit our website. Through the settings of your browser, you can view the content of these cookies and also prevent cookies from being stored on your computer. If you prevent the storage, you may not be able to use all of the features of our website to the full extent.

##### 6.2. Web beacons (clear gifs, pixels)

Web beacons are clear gifs which are used to anonymously track the online usage pattern of our website. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on webpages or in emails and are about the size of the period at the end of this sentence. In addition, we may also use clear gifs in HTML-based emails to track which emails are opened and which links are clicked by recipients.

#### 7. Controller and Processors of the data, transfer of data

Smartmile Deutschland GmbH is part of Smartmile Group, an international group of companies owned by Smart Mile Solutions B.V., Rijkstraatweg 68, NL-3454JD Utrecht, Netherlands, and has databases and processes data in different countries either operated by the local Smartmile Group company or by third parties as processors on behalf of the local Smartmile Group Company. All Smartmile group companies are considered joint controllers of the data, have access to local databases whenever necessary and data may be transferred internally or may be processed by any of the Smartmile companies or their contractors for

the purposes stated in this privacy statement. The contact point to Data Controller of all personal data related to German applicants is Smartmile Deutschland GmbH, as stated in paragraph 1 of this policy, and any exercise of any of the rights as subjects of data collection through Smartmile Deutschland GmbH is effective in relation of entire Smartmile group.

### Smartmile Group Companies

Country	Company	Contact	Authorized Directors	
Global	Smart Mile Solutions B.V. Rijksstraatweg 68 NL-3454JD Utrecht Netherlands	<a href="mailto:info@smartmile.eu">info@smartmile.eu</a> Phone: +31 6 83 969 766 <a href="http://www.smartmile.rocks">www.smartmile.rocks</a>	Frank van Os Aku Hoppo Steffen Luippold	Business ID: 66127769 VAT ID: NL856406247B01
Germany	Smartmile Deutschland GmbH Gottlieb-Daimler-Str. 18/1 D-72202 Nagold Germany	<a href="mailto:kundenservice@smartmile.eu">kundenservice@smartmile.eu</a> Phone: +49 7452 635400 <a href="http://www.smartmile.de">www.smartmile.de</a>	Steffen Luippold Aku Hoppo Frank van Os	Business ID: HRB 757051, AG Stuttgart VAT ID: DE306386855
Finland	Smart Mile Solutions Oy Elimäenkatu 17-19 FI-00510 Helsinki Finland	<a href="mailto:asiakaspalvelu@smartmile.eu">asiakaspalvelu@smartmile.eu</a> Phone: +358 942 720 620 <a href="http://www.smartmile.fi">www.smartmile.fi</a>	Aku Hoppo Steffen Luippold Frank van Os	Business ID: 2834513-1 VAT ID: FI28345131

### 8. Securing data

Smartmile provides the safety of the data by technical and administrative actions. We secure our website and services through strict supervision. Smartmile has adopted binding corporate rules, a system of standards, principles, rules and tools, in an effort to ensure effective levels of data protection and data security according to industry standards. The data is only handled by Smartmile employees and our selected partners. In case the data is handled by Smartmile's partners, any possibly needed transfer is conducted strictly observing due protective policies, sufficient security, only to extent necessary to provide the Smartmile service, and on basis of a written agreement in compliance with applicable legal requirements.

### 9. Right to check information

The customers have the right to get information regarding data stored and collected about themselves. Upon request, we will provide you free of charge with information on data collection, storage and utilization, within the respective legal requirements.

### 10. Correcting information, Right to be forgotten and period of storage of data

The applicant has the right that all personal identifiable data relating to themselves can be completely and permanently erased upon request. If you wish to have personal data corrected or erased please contact us at [privacy\\_de@smartmile.eu](mailto:privacy_de@smartmile.eu) with the specific information you would like us to correct, update or delete plus a proper form of identification to ensure legitimacy of the request. These requests will be subject to any applicable statutory retention obligations imposed on Smartmile. Personal identifiable data will be removed upon request in all databases of Smartmile Group. In order to secure its technical operations Smartmile keeps backups of all databases that will be automatically overwritten within four weeks. Please note that due to this operational necessary procedure there is a latency of 30 days between the removal from the active databases and any backup copies.

Your data is generally stored for as long as your application is processed by Smartmile, unless you consent to the submission of you data to our talent pool. If we are unable to offer you the desired position, the application process for the desired job has been closed and you have not consented to be part of our talent pool, we remove all your data from our systems usually within three months of the original application submission, subject to statutory retention obligations imposed on us by the applicable legislation.

You have a right to lodge a complaint with a supervisory authority (the Data Protection Ombudsman of the State of Baden-Württemberg, Landesbeauftragter für den Datenschutz und Informationsfreiheit, <https://www.baden-wuerttemberg.datenschutz.de/>) in case you consider procession of your personal data by Smartmile to be in breach of applicable legislation.

Valid from: 25.06.2018