

Recruiting Privacy Policy – Smoobu GmbH

Last updated: August 1, 2025

Data privacy is a matter of trust and your trust matters to **Smoobu GmbH**. It is therefore important to us that your personal data is protected and that its collection, processing and use comply with the law.

General information

This Privacy Policy, which refers exclusively to personal data collected as part of the online and offline application process, is to inform you about how your personal data is handled at our end during the recruitment procedure.

The Controller

The Controller under applicable data protection law is:

Smoobu GmbH, Pappelallee 78/79, 10437 Berlin

Contact: **recruiting@smoobu.com**

Data Protection Officer: Waterside DS GmbH, Alter Wandrahm 9 (Block W), 20457 Hamburg,
privacy@smoobu.com

In addition, you may also contact the supervisory authority responsible for **Smoobu**, the Berlin Commissioner for Data Protection and Freedom of Information, Alt-Moabit 59-61, 10555 Berlin, Germany, Phone: +49 (0) 30 13889-0, Fax: +49 (0) 30 2155050, email: mailbox@datenschutz-berlin.de.

Personal data collected as part of the application process

Personal data means according to applicable data protection law (GDPR) any information concerning the personal or material circumstances of an identified or identifiable individual. This includes information such as, for example, your name, address, telephone number and date of birth, but also data relating to your specific career, experiences, salary expectation, etc. by reference to which an individual can be identified. However, information which cannot be (in)directly associated with your real-life identity is not personal data.

Legal basis and purposes of processing personal data collected from application documents and during the application process

If you apply to us electronically, i.e. via email or using our online form, or if we are in contact with you and you have given your consent by submitting your application, getting in contact with us or sending an application letter, we will collect and process your personal data for the purpose of executing the application process, including but not limited to share internally to conduct interviews, case studies (tests) as well as evaluating and assessing the results and preparing contracts for the hiring process, § 26 Abs.1 BDSG in connection with Art. 6 (1) (b) GDPR. By submitting an application via our recruitment website or by confirming your interest with consent, you express your interest in taking up work with us. In this context, you transmit personal data, which we will use and store exclusively for the purpose of your job search/application process.

As part of the application process, we may also use transcription tools powered by artificial intelligence (AI), such as Google Gemini, to generate text-based transcripts of virtual interviews. The purpose of this processing is to support the documentation and evaluation of interviews in a structured and consistent manner and for quality assurance and improvement of the selection process. The recordings and transcripts are not used for any automated decision-making, will not be passed on to unauthorised third parties and are accessible only to Smoobu employees directly involved in the recruitment process. It will be deleted after completion of the procedure, unless longer storage is required by law.

The use of such transcription tools is based on your explicit consent in accordance with Art. 6 (1) (a) GDPR. You will be asked to provide this consent in advance, typically via the interview invitation email. Participation in a transcribed interview is voluntary and does not affect the progress of your application. If you do not provide consent, no transcription will be done from the recorded interviews. You may withdraw your consent at any time with effect for the future by notifying us via privacy@smoobu.com. In such cases, any existing transcripts will be deleted unless further retention is legally justified.

In particular, the following data is collected during this process:

- name (first and last names)
- email address
- age and gender (optional)
- earliest starting date
- education level and respective certificates
- business experiences
- salary expectations (optional)
- phone number

- LinkedIn profile (optional) or other professional profiles
- Any reference by 3rd parties, e.g. former employer, other key stakeholder (if applicable)
- a channel through which you found us
- application-related job interview notes, case study results and evaluation

Furthermore, you can choose to upload expressive documents such as a cover letter, your CV and reference letters. These may contain additional personal data such as date of birth, address etc. Only authorized HR staff and/or staff involved in the application process and who have a need-to-know can access your data. The personal data is stored, as a rule, for the purpose of filling the vacancy for which you have applied and additionally for similar open positions fitting your skills and experiences that might be interesting for you. Your data will be stored for a period of 6 months after the application process has been concluded. This is usually done to fulfil legal requirements and/or defend ourselves against any claims arising from legal provisions. After this period, we delete or anonymise your data unless you agree to extend the length of time we retain your data by another 180 days. In case of anonymization, the data will only be available to us in the form of so-called metadata, without any direct personal reference, for statistical analysis (for example, share of male and/or female applicants, number of applications per specified period of time etc.). Should you be offered and accept a position with us during the application process, we will store the personal data collected as part of the application process for at least the duration of your employment.

Disclosure of data to third parties

With all EU providers that we use for data processing, there is a corresponding Data Processing Agreement in place according to Art. 28 sec. 3 GDPR ("DPA") with a legally defined guarantee of the required measures for the protection of personal data.

Corresponding agreements have been concluded with all providers based outside the EU, so-called third countries, which comply with the EU standard ("Standard Contractual Clauses - SCC") and - if necessary - fulfil all further guarantees for secure processing. In particular, for the processing of personal data by providers located in the USA, providers are carefully selected and proven that they are subject to the EU-US Data Protection Framework (DPF).

Further information on how the processing of personal data is handled by the vendor, it can be found in the respective vendor's privacy policy.

Data transmitted as part of your application will be shared with **Personio SE & Co. KG, Seidlstr. 3, 80335 Munich ("Personio")**, a cloud services provider, offering a human resource and applicant management software solution, located in Germany and engaged by Smoobu to help manage its recruitment and hiring process on Smoobu's behalf.

Privacy Policy: <https://smoobu.personio.com/data-privacy-statement>

We use the Google Workspace services of Google Ireland Limited, Gordon House, Barrow Street Dublin 4, Ireland to send emails following your enquiries, schedule appointments with you and stakeholders and our information related to recruitment. Your email address and your first and last name (for personalizing the email) are processed in order to send the email.

Privacy Policy: <https://policies.google.com/privacy?hl=en-US>

We use the services of Calendly, Inc., 115 E Main St., Ste A1B, Buford, GA 30518, USA (“Calendly”) to allow you a convenient way to schedule your appointments during the application process.

Privacy Policy: <https://calendly.com/legal/privacy-notice>

We use the services of Zoom Communications, Inc., 55 Almaden Blvd, Suite 600, San Jose, CA 95113 (“Zoom”) to conduct interviews, meet with you online and run through the online application process.

Privacy Policy: <https://www.zoom.com/en/trust/privacy/>

We use the services of Docusign International (EMEA) Ltd, 5 Hanover Quay, Ground Floor, Dublin 2, Republic of Ireland (“DocuSign”) to sign any required document or contract (if applicable), e.g. a NDA - Non-Disclosure Agreement to ensure strict confidentiality and keep any and all information meanwhile the application procedure (including any disclosed information, tests, etc.) confidential and secure.

Privacy Policy: <https://www.docusign.com/privacy>

Rights of data subjects

If we as the Controller process personal data, you as the Data Subject as defined in the GDPR have certain rights under Chapter III (GDPR), depending on the legal basis and the purpose of the processing, in particular the rights of access (Article 15 GDPR) and to rectification (Article 16 GDPR), erasure (Article 17 GDPR), restriction of processing (Article 18 GDPR), and data portability (Article 20 GDPR), as well as the right to object (Article 21 GDPR).

If the personal data is processed with your consent, you have the right to withdraw this consent under Article 7 (3) GDPR.

To assert your rights as a data subject in relation to the data processed during this online application process, please refer to our email **privacy@smoobu.com**

Group

Smooibu is a company of the HomeToGo Group. We may share your personal data with our associated companies within the HomeToGo Group on an occasional basis. The HomeToGo Group includes all (current and future) entities that are directly or indirectly controlled by HomeToGo GmbH ("HomeToGo") or are under common control of HomeToGo. The transfer of data within the HomeToGo Group takes place for the following purposes:

- a) Provision of our intercompany services, especially Human resources & recruiting services
- b) Provision of further support services
- c) Compliance with laws and regulations

The legal basis for the transfer of data within the HomeToGo Group is Article 6 (1) (f) GDPR. Sharing this data enables us to fulfill our obligations for group affiliates.

Privacy Policy changes

The further development of the Internet and our services may also affect our Recruiting Privacy Policy. We reserve the right to change this recruiting-specific Recruiting Privacy Policy from time to time in the future in order to comply with current legal requirements or to reflect additions or changes to our recruitment services. The current version of this Recruiting Privacy Policy linked herein applies to your recruitment process.