

Privacy Information for Applicants

We want to inform you about data processing related to your job application and your use of our recruiting platform.

The “controller” in terms of the data protection legislation is GoEuro Travel GmbH, Schönhauser Allee 180, 10119 Berlin, Germany. This means that we are responsible for deciding how we hold and use personal data about you. This notice is aimed at informing you of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR) and the local data protection law.

You can contact us at info@omio.com and our Data Protection Officer at privacy@omio.com.

1. We will comply with data protection law and principles, which means that your data will be:
 - Used lawfully, fairly and in a transparent way.
 - Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
 - Relevant to the purposes we have told you about and limited only to those purposes.
 - Accurate and kept up to date.
 - Maintained only for as long as necessary for the purposes we have told you about, i.e. in relation to the recruitment exercise.
 - Kept securely and protected against unauthorised or unlawful processing and against loss or destruction using appropriate technical and organisational measures.

2. We use the personal data you have provided to us in the course of the recruiting process (e.g. curriculum vitae, cover letter, credentials, questionnaires, interviews via email or other correspondence, or other information you make available via the recruiting platform), including name, title, home/term address, telephone number, personal email address, date of birth, gender, employment history, qualifications, nationality, social media accounts, profession, professional memberships, educational achievements, diplomas, transcripts, languages, computer skills, identification number and any data you provide us during interviews at our premises.

3. Additionally, we may use personal data that we legally acquire from publicly accessible sources (e.g. professional social networks), from recruiters or from reference contacts.

4. The data processing is based on Art. 88 GDPR, § 26(1) BDSG (German Data Protection Act) for the purposes of recruitment.
5. We will use the personal data we collect about you to:
 - Assess your skills, qualifications, and suitability for the role.
 - Communicate with you about the recruitment process.
 - Keep records related to our hiring processes.
 - Comply with legal or regulatory requirements.

Having received your CV and covering letter and the results from any tests you took, we will then process that data to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is suitable to invite you for an interview. If we decide to call you for an interview, we will use the data you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role and it deemed required, we may then take up references and/or any other check before confirming your appointment. You would be contacted and notified if this is required. It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint a suitable candidate to that role.

We also need to process your personal data to decide whether to enter into a contract with you.

6. We will use your sensitive personal data only in so far as we are permitted by Law to do so:
 - We will use data about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or an interview.
 - We will use data about your nationality or ethnicity, to assess whether a work permit and a visa will be necessary for the role.
7. Upon registration in our recruiting platform you may agree that we retain your data for a period of 12 months after the end of the application procedure in our recruitment database, so we may contact you in the future if you are suited for a different position. If you apply for a different position, the 12 month period starts again. Before expiration of the 12 months period we may contact you (e.g. via e-mail) to ask for your consent to extend the retention period. The data processing is based on your consent pursuant to Art. 6(1)(a) GDPR.

If you want to review, verify or correct your personal data, you can do so by logging into the online system. You can withdraw your consent at any time, in

particular by deleting your profile in the Smart Recruiters platform or by sending an email to privacy@omio.com.

8. We delete your data:

- within 30 days once the application procedure is completed; or
- if you have given your consent for keeping your data in our recruitment database, upon expiration of the above mentioned retention period or upon withdrawal of your consent.

According to German law, an application procedure is completed if the terms for claims under the AGG ("Allgemeines Gleichbehandlungsgesetz") have expired (usually six months after the notification of rejection, if no claims or actions pursuant to § 15(4) AGG have been filed).

9. We use external service providers who act solely on our behalf and must not process personal data for their own purposes, including:

- Assessment Center, recruiters and consultants
- External consultants for aptitude diagnostics
- Lawyers and attorneys in case of legal disputes
- Technical service providers

In particular, we use the SmartRecruiters portal operated by SmartRecruiters Ltd., 59-60 Thames Street, Windsor, Berkshire SL4 1TX, United Kingdom. SmartRecruiters is acting as a data processor on our behalf pursuant to Art. 28 GDPR.

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

10. We implement appropriate technical and organizational security measures to ensure appropriate security of your personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our specific instructions and they are subject to a duty of confidentiality. We do not perform automated decision-making or profiling pursuant to Art. 22 GDPR.

11. In addition to the right to revoke your consent given to us, if applicable, you have the right to request access to (Art. 15 GDPR) and rectification (Art. 16 GDPR) or erasure (Art. 17 GDPR) of personal data or restriction of processing (Art. 18

GDPR), the right to object (Art. 21 GDPR) and the right to data portability (Art. 20 GDPR). You have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR).