

**Who We Are and How We Process Your Personal Data**

Jesse & Partner GmbH (hereinafter also referred to as “us” or “we”) is a specialized recruiting firm that offers executive search, HR consulting, management consulting, and testing services. The protection of your personal data is very important to us. In this Privacy Notice, we inform you about the categories of personal data we collect, the purposes for which we use this data, and how we process your data when you visit our website, apply for a position with us, we reach out to you, provide recruiting and employment placement services to you, or maintain a relationship with you after we have provided a service to you or you have provided a service to us. The following information applies to you if you fall into one of the following categories:

- Job applicants for whom we provide employment placement services or who apply for a vacant position with us and contact us via our website, job boards, social media pages, or other sources;
- Customers and their contacts with whom we maintain a business relationship and whom we assist in filling vacant positions;
- potential applicants, as well as potential clients and their contacts, with whom we communicate to present our products and services;
- Service providers and their contacts who provide various services to us;
- Users of our websites

(collectively referred to as “you” or “your”).

**Data Controller**

The controller responsible for processing your data is Jesse & Partner GmbH, which processes your data on its own behalf when you visit the website, when it provides you with recruiting and employment placement services, when it contacts you, when it maintains the relationship with you after finding a position for you, when it sends you marketing communications, fills a vacant position itself, or when you provide a service for the relevant company. **Details of Data Processing**

Below is an overview of what personal data we process about you, for what purposes, on what legal basis, and where we collect this data.

If you do not provide us with your personal data, even though we need to collect it to process a request from you, fulfill a contract with you, or because we are legally required to do so, we may have to reject your request or may be unable to fulfill our contractual obligations to you.

**Users of our website or apps**

Purpose	Data Categories	Legal Basis	Collection of Your Data
When you visit our	In this context, we	The data processing is	We collect the data

<p>website or use our app, we process your data for the following purposes:</p> <ul style="list-style-type: none"> <li>• <b>Accessing the Website/App</b></li> <li>• Ensuring a <b>smooth connection,</b></li> <li>• <b>Ensuring and optimizing the functionality</b> of our website and its <b>user-friendliness</b></li> <li>• Ensuring and evaluating system <b>security and stability</b></li> </ul> <p>In this context, we do NOT use cookies or other similar technologies.</p>	<p>process the following data:</p> <ul style="list-style-type: none"> <li>• IP address of the requesting internet-enabled device</li> <li>• Date and time of access</li> <li>• Name and URL of the file accessed</li> <li>• Website/ application from which the access originated (referrer URL), the browser you are using, and, if applicable, the operating system of your internet-enabled computer,</li> <li>• Name of your Internet service provider</li> </ul>	<p>based on the following legal grounds:</p> <p>Art. 6(1)(b) GDPR— establishment, performance, or termination of the contract with you</p> <p>Art. 6(1)(f) GDPR—our legitimate interest in the security, stability, and usability of our website</p> <p>Art. 6(1)(a) GDPR – Your consent</p>	<p>directly from you.</p>
<p>We <b>do not</b> use cookies or analytics tools on our website.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>		<p>We do not collect data directly from you.</p>

### Job applicants

Purpose	Data Categories	Legal Basis/Legitimate Interest	Collection of Your Data
<p>We process your data to <b>provide you with employment placement services or to conduct a recruitment process with you for the</b></p>	<p>In this context, we may process the following data:</p> <ul style="list-style-type: none"> <li>• Name and address</li> <li>• Phone number</li> </ul>	<p>The data processing is based on the following legal grounds:</p> <p>Art. 6(1)(b) GDPR – Establishment, performance, or</p>	<p>We collect the data directly from you.</p> <p>In addition, we may also collect your data from third parties, specifically from</p>

**purpose of establishing an employment relationship with you.**

In this context, we use your data to communicate with you, answer your questions, analyze your resume, find a suitable position for you, create a candidate profile for you, advise you on salary matters, schedule interviews, conduct aptitude tests with you, and forward your application materials to the employer of your choice.

- Email address
- Information in your resume
- Information about your educational background
- References
- Work experience
- Employment references
- Salary expectations
- Career Goals
- Security Clearance Results
- Nationality
- Residence and work permits
- Photos
- Language Skills
- Assessment center test results
- In certain cases, specific personal data such as:
  - disabilities,
  - your health
  - Occupational health examinations
  - Criminal convictions, criminal offenses

termination of the contract with you

Art. 6(1)(c) GDPR – Compliance with legal obligations under labor and social security law

Art. 6(1)(f) GDPR – our legitimate interest in efficient work organization processes, as well as our legitimate interest in maintaining our customer relationship with you

We process your special categories of personal data only on the basis of your consent pursuant to Art. 6(1)(a) and Art. 9(2)(a) of the GDPR, and to the extent that we are obligated to do so for reasons of labor and social law, including for reasons of equal opportunity. In these cases, we base the processing of your data on Article 9(2)(b), (g), and (h) of the GDPR.

- reference providers, e.g., former employers or clients, to verify your information
- educational institutions
- publicly available professional sources, such as LinkedIn, StepStone, or Xing, to supplement the information we already have about you so that we have a better chance of finding a suitable position for you;
- clients to whom we have provided your resume and who have contacted you in connection with your job application.

We only contact those references that you have provided to us during the selection process and the course of our work.

<p>We process your data when you <b>register</b> with us and make your applicant information available to us and, potentially, to prospective employers.</p>	<p>The data processing is based on the following legal grounds:</p> <p>Art. 6(1)(a) GDPR – Your consent</p> <p>Art. 6(1)(f) GDPR (in conjunction with § 7(3) UWG, insofar as it concerns electronically transmitted surveys) – our legitimate interest in direct marketing activities and the distribution of promotional content, as well as our legitimate interest in improving and further developing our services and offerings</p>	<p>We collect the data directly from you.</p>	<p>In connection with the data processing described here, it is possible that <b>both internal and external service providers</b> from the following areas may have access to your data:</p> <ul style="list-style-type: none"> <li>• Marketing</li> <li>• Brand Analysis</li> <li>• Sales</li> <li>• IT Solutions</li> <li>• IT Support</li> <li>• Mail and Shipping Services</li> <li>• Telecommunications</li> <li>• Data Analysis</li> </ul>
<p>We process your data to send you <b>promotional information, newsletters, and other electronic promotional materials</b>, and to inform you about job openings, industry reports and insights, events, and other news.</p>	<p>In this context, we may process the following data:</p> <ul style="list-style-type: none"> <li>• Name,</li> <li>• Email address</li> <li>• Phone number</li> <li>• Your marketing, information, and job preferences</li> </ul>	<p>The data processing is based on the following legal grounds:</p> <p>Art. 6(1)(a) GDPR – Your consent</p> <p>Art. 6(1)(f) of the GDPR (in conjunction with § 7(3) of the UWG, insofar as it concerns electronically transmitted surveys) – our legitimate interest in direct marketing activities and the distribution of promotional content</p>	<p>We collect the data directly from you.</p>

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### Service Providers and Our Contacts at These Service Providers

Purpose	Data Categories	Legal Basis/Legitimate Interest	Collection of Data
<p>We process your personal data to enter into a service agreement with you, to provide you with our services, and to communicate with you within the scope of our business relationship. In addition, we process your data for billing purposes.</p>	<p>In this context, we may process the following data:</p> <ul style="list-style-type: none"> <li>• Company name</li> <li>• Name and address</li> <li>• Contact information for the designated contacts</li> <li>• Phone number</li> <li>• Overview of services provided</li> <li>• Contract and billing data</li> </ul>	<p>The data processing is based on the following legal grounds:</p> <p>Art. 6(1)(b) GDPR— establishment, performance, or termination of the contract with you</p> <p>Art. 6(1)(f) GDPR – our legitimate interest in efficient work organization processes and the division of labor within Jesse &amp; Partner GmbH</p>	<p>We collect the data directly from you.</p>
<p>In certain cases, we also process your data to assert and <b>defend</b> against <b>legal claims</b>.</p>	<p>In this context, we process the following data:</p> <ul style="list-style-type: none"> <li>• Company name</li> <li>• Name and address</li> <li>• Contact information for the contact persons</li> <li>• Phone number</li> <li>• Overview of services provided</li> <li>• Contract and billing information</li> <li>• Data required to defend against and</li> </ul>	<p>Data processing is based on the following legal grounds:</p> <p>Art. 6(1)(f) GDPR (our legitimate interest in defending against and asserting legal claims)</p>	<p>We collect the data directly from you.</p>

	assert claims		
<p>We process your data in the event <b>of a restructuring, merger, sale, joint venture</b>, assignment, or any other <b>transfer or disposition</b> of all or part of our company, to the extent necessary for these purposes.</p>	<p>In this context, we process the following data:</p> <ul style="list-style-type: none"> <li>• Company name</li> <li>• Name and address</li> <li>• Contact information for the contact persons</li> <li>• Phone number</li> <li>• Overview of services provided</li> <li>• Contract and billing data</li> </ul>	<p>The data processing is based on the following legal grounds:</p> <p>Art. 6(1)(f) GDPR: our legitimate interest in a <b>restructuring, merger, sale, joint venture, assignment</b>, or other <b>transfer or disposition</b> of all or part of our company</p> <p>Article 6(1)(a) of the GDPR —your consent</p>	<p>We collect the data directly from you.</p>
<p>We also process your personal data to <b>comply with data protection obligations</b>, in particular to ensure your rights as a data subject.</p>	<p>In this context, we process the following data:</p> <ul style="list-style-type: none"> <li>• Company name</li> <li>• Name and address</li> <li>• Contact information for the contact persons</li> <li>• Phone number</li> <li>• Contract and billing data</li> <li>• Data protection statements (e.g., declarations of consent to processing)</li> <li>• Declarations regarding the revocation of consent you have provided</li> <li>• Declarations regarding objections to the processing of</li> </ul>	<p>Art. 6(1)(c) GDPR (Compliance with legal obligations)</p>	<p>We collect the data directly from you.</p>

	<p>personal data</p> <ul style="list-style-type: none"> <li>• Declarations regarding the exercise of your rights to access, rectification, erasure, restriction of processing, and data portability, including the information you provide to us when exercising your rights.</li> </ul>		
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### **Cookies, Analytics Tools, and Social Media**

We use social media and do NOT use cookies or other analytics technologies on our website.

### **Automated Decisions and Profiling**

We do not make decisions based solely on automated data processing; there is always a person who intervenes in the process before a decision is made.

We conduct profiling based on applicants' personal data:

- To do this, we use an analytics tool with semantic search technology (a type of artificial intelligence) that enables us to intelligently search and filter resumes in our database. By entering relevant keywords—such as years of work experience or field of expertise—into the tool, all uploaded resumes are analyzed, and the result is a pool of candidates generated by matching the keywords in the applicants' resumes and ranking the applicants based on their suitability for the respective position. We use it to make our recruitment processes more efficient by enabling us to match applicants with more suitable positions. As explained above, a recruiter always verifies this process, so no automated decision-making takes place.

Please note that no profiling activities result in legal or similarly significant consequences for applicants. However, if you would like to learn more about this, please contact us.

### **Data Transfers to Countries Outside the EEA**

In some cases, we also process your personal data outside the European Economic Area (EEA). If data is transferred to any of the recipients listed above whose registered office or data processing location is outside the EEA or a country for which the European Commission has determined an adequate level of data protection, we ensure, prior to the transfer, that the data transfer is covered by a legal basis and that

safeguards ensuring an adequate level of data protection with respect to the data transfer are in place (e.g., through contractual safeguards, officially recognized regulations, or binding internal data protection policies at the recipient's organization) or that you have given your consent to the data transfer.

### **Ensuring the Security of Your Personal Data**

We have implemented and maintain appropriate technical and organizational measures to protect your personal data from destruction, loss, alteration, or unauthorized disclosure or access—whether accidental or unlawful. Only authorized personnel and third-party service providers are granted access to personal data in accordance with the “need-to-know” principle, and these employees and service providers are contractually obligated to treat the relevant information as confidential.

### **How long we retain your personal data**

We retain your personal data for as long as necessary to fulfill the purpose for which we collected it, which may be an ongoing purpose. For example, if you are a job applicant, we will retain your personal data for the duration of our business relationship with you and beyond, as we often assist applicants with job placement over many years and possibly throughout their entire careers.

We retain some personal data for longer than others. When determining the appropriate retention period for personal data, we consider factors such as the purposes for which we process your personal data—including legal, regulatory, accounting, and reporting obligations—the nature and volume of the personal data we hold about you, and the potential risk that you may suffer harm from the unauthorized use or disclosure of your personal data.

If we process your personal data for direct marketing purposes, we will do so until you request that we cease this processing activity, as well as for a short period after receiving your request (so that we can comply with your request). In addition, we will note in our records that you have asked us not to send you direct marketing or to process your data indefinitely so that we can fulfill your request.

### **Your Rights Regarding Data Protection**

Pursuant to Article 21 of the GDPR, you have the right **to object** at any time **to** our processing of your data on grounds relating to your particular situation, provided that such processing is based on Article 6(1)(e) of the GDPR or on the protection of “legitimate interests” pursuant to Article 6(1)(f) of the GDPR. If you exercise your right to object, we will cease processing unless we can demonstrate compelling legitimate grounds for continued processing that override your rights and interests.

Under EU data protection legislation, you have numerous rights regarding the processing of your personal data. These rights include the right to withdraw your consent pursuant to Article 7(3) of the GDPR, the right to request information about the personal data concerning you as well as a copy thereof (Article 15 of the GDPR), to

rectify the personal data concerning you (Article 16 of the GDPR), to erase (Article 17 of the GDPR), or to restrict its processing (Article 18 of the GDPR), to receive the personal data you have provided to us in a structured, machine-readable format, and to request that we transfer this data to another data controller (Article 20 of the GDPR).

You may withdraw your previously given consent to receive marketing communications or object to data processing for direct marketing purposes by following the steps outlined in our communications and unsubscribing from marketing communications, or by contacting us using the contact information provided in this Privacy Notice. We have also set up a Marketing Preferences Center where you can view and select your preferences and opt out of receiving marketing communications at any time. To access the Marketing Preferences Center, please also follow the steps outlined in the marketing communications.

Please note that your rights may be limited in certain circumstances. For example, your rights may be restricted if fulfilling your request would disclose personal data about another person, if it would infringe on the rights of a third party (including our rights), or if you ask us to delete information that we are legally required to retain or for which we have a compelling legitimate interest in retaining. When responding to your request, we will inform you of all relevant exceptions on which we rely as a basis for our decision.

In addition, for processing activities based on the legitimate interests of the companies, we have conducted a legitimate interests assessment to ensure that our interests do not override your interests or fundamental rights and freedoms; you may request this assessment through the contact information provided at the end of this Privacy Policy.

## **Questions and Complaints**

If you have any questions about this Privacy Notice or the processing of your personal data, or if you wish to file a complaint, you can fill out our [contact form](#) or send an email to us or our Data Protection Officer at [dpo@page.com](mailto:dpo@page.com).

If your concerns persist or you believe that there has been a breach of the protection of your personal data, you have the right to file a complaint with a supervisory authority. A list of the competent authorities in the EEA can be found [here](#).

## **How to Contact Us**

### **Exercising Your Rights**

To exercise your rights, withdraw your consent to data processing, or unsubscribe from our commercial communications, you have the following options:

- contact us by email at [info@jesse-partner.de](mailto:info@jesse-partner.de), or
- contact us or our Data Protection Officer at

## **Data Protection Officer (DPO)**

Morten Laabs

Jesse & Partner GmbH

Wikingeck 7a

24837 Schleswig

### **Changes to Our Privacy Policy**

We may update this Privacy Policy at any time. All material changes to this Privacy Policy will be posted on this website and, where appropriate, announced through other communication channels.

