



Data protection notice

The protection and confidentiality of your data are highly important to ZEAL Group. The collection and use of your personal data is performed solely within the terms of the statutory provisions of the applicable data protection law. This Data Protection Notice will tell you about the personal data we collect in connection with your application process, and the purpose for which this data will be used. ZEAL Group collects and uses your personal data solely in accordance with the provisions of the data protection laws that apply in the Federal Republic of Germany and the European Union. Information concerning the type, scope and purposes of collection and use of personal data is set out in the following.

This Data Protection Notice applies to all of the following companies:

ZEAL Group, eSailors Ltd. and Ventura24 S.L.U.

Data controller

The data controller within the meaning of the data protection law is:

Zeal Group

If you have any questions or comments concerning data protection, you can contact us by email at the following address Necla.Vardal@sg-tech.co.uk.

Data protection officer

Necla.Vardal@sg-tech.co.uk

Contract data processing

softgarden e-recruiting GmbH Tauentzienstr. 14, 10789 Berlin, provides software for processing application data. softgarden processes the data on behalf of ZEAL Group.

The Data Protection Officer within the meaning of the data protection laws is:

Marco Tessendorf
procado Consulting, IT - & Medienservice GmbH
Warschauer Str. 58a

10243 Berlin
E-Mail: eDSB@procado.de

Location of the data processing

softgarden operates an IT infrastructure at its administrative offices in Berlin and Saarbrücken, as well as in the data processing centres operated by the following service providers

- *myLoc managed IT AG*
- *PlusServer GmbH*

All data processing centres are located within the territory of Germany.

Object of the data protection

The object of the data protection is personal data. According to Art. 4 no. 1 GDPR [German Federal Data Protection Act], this means any information relating to an identified or identifiable natural person (“data subject”). This includes information such as name, postal address, email address and telephone number and can in certain circumstances include usage data. Usage data relates to the data necessary to use our website, such as information concerning the start, end and scope of the use of our website and login data.

This Data Protection Notice applies to the careers portal and the applicant management system of ZEAL Group.

Collection and use of your data

Automated data collection

softgarden and third-party services may collect data for operating and maintenance purposes. These record interaction-related information via the application (system logs), or use other personal data (e.g. IP address) for this purpose.

When accessing softgarden products, your internet browser will automatically transfer data due to technical reasons. The following data, which you will provide to us in certain circumstances, will be stored separately from other data:

- *date and time of access,*
- *browser type and version,*
- *applicable operating system,*
- *URL of the previously visited website,*
- *quantity of data transferred,*

- *IP address of the access*

These data will be stored solely for technical reasons, and at no time will they be attributed to a particular person. Legal basis is Art. 6 (1) 1st sentence point f) GDPR.

Data entered by the user

General information

You can log-in in order to make the application process more transparent for you. To do this, you will need to enter your name, your email address and a password. This data is needed to create and administer an account for you in the careers portal. In addition, we will also need this data (and possibly other data too) to respond to requests, questions and criticisms.

Other option data includes:

- *contact data (address, telephone number)*
- *résumé information (such as school education, vocational training, professional experience, language skills)*
- *profiles in social networks (e.g. XING, LinkedIn, Facebook)*
- *documents connected with applications (application photos, letter of introduction, certificates, work reference, sample work etc.)*

Legal basis of the processing: Section 26 (1) German Federal Data Protection Act (BDSG) “new”.

Processing CV documents

softgarden processes and analyses the documents uploaded by the applicant, in order to extract résumé information. The processing is performed within the infrastructure belonging to softgarden. No communication is made to third parties. The legal basis is Section 26 (1) German Federal Data Protection Act (BDSG) “new”.

Transfer of personal data

During the course of the ongoing development of our business activities, changes may occur to the structure of the softgarden e-recruiting GmbH Company, whereby the legal form is amended, subsidiaries, units or parts thereof are formed, acquired or sold. Where such transactions occur, the customer information will be transferred together with the transferred part of the company. In the case of every such transfer of personal data in this context, softgarden shall ensure that this takes place in accordance with this Data Protection Notice and with the applicable data protection laws Legal basis is Art. 6 (1) 1st sentence point f) GDPR.

During the course of the application process, it may occur that your data are forwarded by e-mail to employees of ZEAL Group.

Cookies

softgarden stores cookies to offer you a comprehensive range of functions, and to design our website to be more user-friendly. Cookies are small files stored on your computer with the aid of your internet browser. If you prefer to block the use of cookies, you can use your browser settings to prevent them from being stored on your computer. Please note that this may restrict the functionality and the functional scope of our website.

This website uses the following types of cookies, and their scope and function is described below:

Transient Cookies

Transient cookies are automatically deleted when you close your browser. This particularly includes session cookies. They store what is known as a session ID, which correlates various queries made by your browser during a common session. This helps to identify your computer when you return to the website. Session cookies are deleted once you log out or close your browser.

Persistent Cookies

Persistent cookies are automatically deleted after a given time, which varies depending on the cookie in question. You may delete any cookie using the security preferences in your browser at any time.

Use of the collected data

User data is collected to enable softgarden to deliver the services. Data is also collected for the following purposes: analytics, interaction with support and evaluation platforms, administration of support and contact queries, administration of use databases, administration of contacts and for sending messages, contacting the user, enabling third-party providers to access profiles (e.g login via LinkedIn or XING), and displaying the content of external platform.

The personal data used for the purposes listed here, is described in the applicable sections of this document.

Improvement of softgarden services

Various systems are employed in order to improve the services on offer, and to assist customers with support inquiries.

Platforms for online surveys

With this type of service, users can interact directly via the application with online survey platforms operated by third parties. This type of service might still collect navigation and usage data for the pages where the service is installed, even when users do not use the service. Legal basis is Art. 6 (1) 1st sentence point f) GDPR.

The SurveyMonkey widget is a service for interacting with the SurveyMonkey online survey platform operated by SurveyMonkey Inc.

Personal data collected: cookie and usage data.

Processing location: USA – <https://www.surveymonkey.com/mp/policy/privacy-policy/>

Additional information concerning the collection and processing of data

Legal measures

The data controller may use the personal data of the user for legal purposes in court proceedings or in advance of possible law suits, arising from the fact that softgarden products or the associated services did not function properly. The user is aware that public authorities may demand that softgarden surrender personal data. Legal basis is Art. 6 (1) 1st sentence point e) GDPR.

Information not contained in the Data Protection Notice

Additional information concerning the collection or processing of personal data may be requested at any time from the controller, which can be contacted using the specified data.

Rights of users

Users are entitled to be provided with information at any time, confirming whether or not their personal data is being stored, and they may contact the controller in order to find out about the content and source of the stored data, to review its accuracy, to demand that it be supplemented, erased, updated, corrected or converted into an anonymised format or to have a block imposed on unlawfully stored data, and to object to processing on legitimate grounds.

If you have any concerns in this respect, please send an email to the Necla.Vardal@sg-tech.co.uk or send a letter by regular mail using the address provided above.

You are also entitled at any time, to exercise your right to object without stating any reasons, and to modify or wholly withdraw your declaration of consent, taking effect for the future. You can communicate your withdrawal of consent to the contractual partner by regular mail, by email or by fax. In doing so, you will incur no costs apart from the postage or the cost of sending the email etc. according to the existing base tariff. However, please note that you will no longer be able to use the software in this case.

Duration of storage

After the application process has been processed, your data will be stored for 12 months in the event you are recruited and for 6 months in the event your application is rejected.

After this time period has expired, the data will be anonymised and made available for future statistical analyses.

softgarden's products support Do Not Track requests from web browsers.

To find out if applicable third-party providers follow the Do Not Track protocol, please read the privacy policy for the service in question.

Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the GDPR. The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Art. 78 GDPR.

Changes to this Data Protection Notice

softgarden reserves the right, having appropriately informed the user on this website, to make changes to this Data Protection Notice at any time. Users are therefore advised to view these pages regularly, so as to review the date of the most recent amendment as specified at the bottom of the screen. If a user objects to an amendment to this Data Protection Notice, he may no longer be permitted to use the services offered by softgarden, and he may request that softgarden erase his personal data. Unless stated otherwise, the applicable current Data Protection Notice shall apply to all the user's personal data as stored by the controller.