

# OUR PRIVACY POLICY

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## INTRODUCTION

This Privacy Policy explains what we do with your personal data, whether we are in the process of helping you regarding your career development, your applications or while expanding your business to Germany or abroad, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our Customers, continuing our relationship with you once we have provided you with a service or when you are visiting our website or booking a service through our website.

It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy applies to the personal data of our website Users, Candidates, Clients, Cooperation partners and Suppliers. All points which refer to the use of our website exclusively concern the website hosted on our domain [www.hallogermany.com](http://www.hallogermany.com).

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the full data of the company responsible for your personal data ("waywise GmbH" or "us") can be found here:

waywise GmbH  
c/o Factory Works GmbH  
Rheinsberger Str.76/77  
10115 Berlin

Management Board: Jana Köhler  
Registered at: Amtsgericht Charlottenburg, HRB 193617

It is important to point out that we may amend this Privacy Policy from time to time. Please just visit our website if you want to stay up to date, as we will post any changes here.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

## DETAILED OVERVIEW

### What kind of personal information do we collect?

So you're looking for a bit more insight into what data we collect about you? Here's a more detailed look at the information we may collect. The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

**CANDIDATE DATA:** Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

Name;

Age/date of birth;

Sex/gender;

Photograph;

Marital status;

Contact details;

Education details;

Employment history;

Language skills and certificates;

Referee details;

Immigration status (whether you need a work permit);

Nationality/citizenship/place of birth;

A copy of your driving licence and/or passport/identity card;

Financial information (where we need to carry out financial background checks);

Availability (timewise, i.e. cancellation period in your current employment arrangement)

Details of any criminal convictions if this is required for a role that you are interested in applying for;

Details about your current remuneration, pensions and benefits arrangements;

Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;

Extra information that you choose to tell us;

Extra information that your referees chooses to tell us about you;

Extra information that our Clients may tell us about you, or that we find from other third party sources such as job sites;

Any application documents you choose to share with us in the course of our collaboration;

Please note that the above list of categories of personal data we may collect is not exhaustive.

**CLIENT DATA:** If you are a waywise GmbH customer, we need to collect and use information about you, or individuals at your organisation in the course of providing you with services. The more information we have, the better we can tailor our performance for your specific needs.

We distinguish between two kinds of services when collecting client data:

**Consulting and recruitment services for Organisations (i.e. Companies, Universities, Associations):** This refers to i.e. consulting and recruitment services such as: National and international recruitment incl. candidate search, international branding strategies and channels, international organizational, personnel and team development, intercultural training or

organizational support for international assignments. These services are tailor-made for the individual needs of the client.

The data we collect from Clients who book these assignments is actually very limited. We generally only need to have your contact details or the details of individual contacts at your organisation (such as their names, telephone numbers, email addresses and company address) to enable us to ensure that our relationship runs smoothly. In addition, we hold information about your use of our consulting or recruitment services, requested offers and feedback on our consulting or recruitment services. We also hold information relating to your engagement or feedback on Candidate profiles and offers requested by you, which we use to ensure that our marketing communications to you are relevant and timely. We may also hold extra information that someone in your organisation has chosen to tell us or which we have created for you under a consulting or recruitment assignment. If we need any additional personal data for any reason, we will let you know.

**Counselling and training services (mainly for Individuals):** This refers to all our counselling and training services i.e. for career guidance, application checks or interview trainings you can book with us online through our website.

As part of counselling and training assignments, we only collect data to ensure a smooth business relationship and to provide you with a service that is tailored to your situation and interests. In addition, we collect information about your use of our counselling and training services or offers you requested as well as feedback on our counselling and training services. We use these to ensure that you receive appropriate advertising from us at the right time and to continually improve our services. The following information is collected by us:

Name;

Sex/Gender;

Current location

Contact details;

Query (in case you have specified a question);

Date of booking;

Date of service fulfilment (the date when the counselling session or training takes place);

Extra information that you choose to tell us;

Information that we create for you as part of a research assignment or application training

In case you book career guidance or interview preparation we may collect the following additional information:

Education details;

Employment history;

Language skills;

Nationality;

Information on your interests and needs regarding future employment;

Any application documents you choose to share with us in the course of our collaboration;

Information on how you found out about waywise GmbH's services;

Please note that the above list of categories of personal data we may collect is not exhaustive.

**COOPERATION PARTNERS AND SUPPLIER DATA:** We don't collect much data about our Cooperation partners and Suppliers – we simply need to make sure that our relationship runs smoothly. We'll collect the details for our contacts within your organisation, such as names, telephone numbers and email addresses. We'll also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us.

**WEBSITE USERS:** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, for example by using the contact form, we will collect any information that you provide to us, for example your name and contact details.

Furthermore, we use third-party providers for the hosting, administration and design of our website and online scheduling tools. These third-party providers may also collect your personal data when you visit our website. More information on the third-party providers we use can be found [here](#).

### **How do we collect your personal data?**

**CANDIDATE DATA:** We collect Candidate personal data in three primary ways:

Personal data that you, the Candidate, gives to us;

Personal data that we receive from other sources; and

Personal data that we collect automatically.

#### **Personal data you give to us**

waywise GmbH needs to know certain information about you in order to provide a tailored service, especially in case of a counselling service. This will enable us to provide you with the best opportunities, and should save you time in not having to trawl through information about jobs and services that are not relevant to you.

There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

Entering your details on the waywise GmbH website or via a waywise GmbH application form, as part of the registration process;

Leaving a hard copy CV or other application documents at a waywise GmbH recruitment event or job fair;

Emailing your application documents to a waywise GmbH consultant or being interviewed by them;

Uploading your application documents on our website;

Sending your application documents to us or one of waywise GmbH's consultants on social media;

Applying for jobs through a job aggregator, which then redirects you to the waywise GmbH website;

Entering your personal details into a waywise GmbH microsite; or

Entering a competition through a social media channel such as Facebook or Twitter.

### **Personal data we receive from other sources**

We also receive personal data about Candidates from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

Your referees may disclose personal information about you;

Our Clients may share personal information about you with us;

In case you fill in our application form at one of our Cooperation partners, this Cooperation partner may share information about you with us;

We may obtain information about you from searching for potential Candidates from third party sources, such as LinkedIn and other job sites;

If you 'like' our page on Facebook or 'follow' us on LinkedIn, YouTube, Twitter or Instagram we will receive your personal information from those sites;

### **Personal data we collect automatically**

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

**CLIENT DATA** We collect Client personal data in three ways:

Personal data that we receive directly from you;

Personal data that we receive from other sources; and

Personal data that we collect automatically.

### **Personal data that we receive directly from you**

We both share the same goal – to make sure that you get the best service possible. We will receive data directly from you in two ways:

Where you contact us proactively, usually by phone, email, Facebook, LinkedIn or through our website; and/or

Where we contact you, either by phone or email, or through our consultants' business development activities more generally.

## **Personal data we receive from other sources**

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us);

From delegate lists at relevant events; and

From other limited sources and third parties (for example from our Candidates to the extent that they provide us with your details to act as a referee for them).

## **Personal data we collect via our website**

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information please click [here](#).

**WEBSITE USERS:** When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website, for example by using the contact form.

We collect your data automatically via cookies, in line with cookie settings in your browser. If you are also a Candidate or Client of waywise GmbH, we may use data from your use of our websites to enhance other aspects of our communications with or service to you and optimize our online services. If you would like to find out more about cookies, including how we use them and what choices are available to you, please click [here](#).

Furthermore, we use third-party providers for the hosting, administration and design of our website and online scheduling tools. These third-party providers may also collect your personal data when you visit our website. More information on the third-party providers we use can be found [here](#).

## **How do we use your personal data?**

Having obtained data about you, we then use it in a number of ways.

**CANDIDATE DATA:** We generally use Candidate data in three ways:

Recruitment Activities; and

Marketing Activities; and

To help us to establish, exercise or defend legal claims

Here are some more details about each:

### **Recruitment Activities**

Our focus in all recruitment activities lies on bringing together the right Candidates and the right jobs. We've listed below various ways in which we may use and process your personal data for this

purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

Collecting your data from you and other sources, such as LinkedIn or Xing;

Storing your details (and updating them when necessary), so that we can contact you in relation to recruitment;

Providing you with our recruitment services and to facilitate the recruitment process;

Assessing data about you against vacancies which we think may be suitable for you;

Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;

Enabling you to submit your CV, apply online for jobs or to subscribe to alerts about jobs we think may be of interest to you;

Allowing you to participate in specialist online trainings;

Carrying out our obligations arising from any contracts entered into between us;

Carrying out our obligations arising from any contracts entered into between waywise GmbH and third parties in relation to your recruitment;

Carrying out customer satisfaction surveys;

Verifying details you have provided, using third party resources (such as psychometric evaluations or skills tests), or to request information (such as references, qualifications, to the extent that this is appropriate and in accordance with local laws);

Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you want to know more about what this means, please click [here](#). If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this [here](#).

## **Marketing Activities**

We may periodically send you information that we think you may find interesting, or to ask for your help with connecting other Candidates with jobs. In particular, we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive. To:

enable us to develop and market other products and services;

send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;

display promotional excerpts from your details on waywise GmbH' website(s) as a success story (only where we have obtained your express consent to do so); and

provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with waywise GmbH.



We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in (which we explain further below).

Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by submitting a job application or CV, or registering a vacancy to be filled), and we are marketing other recruitment-related services. Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows us to suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us finding you a new position. For other types of e-marketing, we are required to obtain your explicit consent.

The conditions that apply to our using of soft-opt-in consent are that: (i) we have obtained your email address in connection with the sale of goods or services; (ii) we use that address only for direct advertising of our own (or substantially similar) services; (iii) you have not objected to this use; and (iv) we clearly advise you, in each such communication, of your right to opt-out.

In all other e-marketing circumstances, we are required to obtain your specific "opt-in" consent and we are required to keep records of such consent having been received. Therefore, we first ask you to opt-in to receive e-marketing. This consent can either be given by email, by clicking a box or written in one of our waywise GmbH forms. We may only add you to our marketing list once we have received your specific "opt-in" consent.

If you are not happy about our approach to marketing, you have the right to withdraw your consent at any time and can find out more about how to do so [here](#).

All our marketing is based on what we think will serve our Clients and Candidates best, but we know we won't always get it right for everyone. We may use your data to show you waywise GmbH adverts and other content on other websites, for example Facebook. If you do not want us to use your data in this way, please turn off the "Advertising Cookies" option (please refer to our Cookies Policy). Even where you have turned off advertising cookies, it is still possible that you may see a waywise GmbH advert, but in this case it won't have been targeted at you personally, but rather at an anonymous audience.

You have the right to withdraw that consent at any time and can find out more about how to do so [here](#).

### **To help us to establish, exercise or defend legal claims**

In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

**CLIENT DATA:** We use Client information in two ways:

Marketing Activities; and

To help us to establish, exercise or defend legal claims

Here are some more details about each:

### **Marketing Activities**

We've listed below the various ways in which we use your data in order to facilitate this.

Storing your details (and updating them when necessary), so that we can contact you in relation to Consulting and Recruitment services as well as Counselling and Training services;

Keeping records of our conversations and meetings, so that we can provide targeted services to you;

Undertaking customer satisfaction surveys; and

Processing your data for the purpose of targeting appropriate marketing campaigns.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. If you would like to know more about what this means, please click [here](#).

If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this [here](#).

Subject to any applicable local laws and requirements, we will not, as a matter of course, seek your consent when sending marketing materials to a corporate postal or email address.

If you are not happy about this, you have the right to opt out of receiving marketing materials from us and can find out more about how to do so [here](#).

#### **To help us to establish, exercise or defend legal claims**

In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

**COOPERATION PARTNER AND SUPPLIER DATA:** We realise that you're probably busy, and don't want us to be contacting you about all sorts of things. To find the right balance, we will only use your information:

To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;

To offer services to you or to obtain support and services from you;

To perform certain legal obligations;

To help us to target appropriate marketing campaigns; and

In more unusual circumstances, to help us to establish, exercise or defend legal claims.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. If you want to know more about what this means, please click [here](#).

We will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address.

If you are not happy about this, in certain circumstances you have the right to object and can find out more about how to do so [here](#).

**WEBSITE USERS:** We use your data to help us to improve your experience of using our website, for example by analysing the links you clicked most to help us to present information to you that we think you'll be interested in. If you would like to find out more about cookies, including how we use them and what choices are available to you, please click [here](#).

Furthermore, we use third-party providers for the hosting, administration and design of our website and online scheduling tools. These third-party providers may also collect your personal data when you visit our website. More information on the third-party providers we use can be found [here](#).

### **Who do we share your personal data with?**

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;

Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);

Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);

Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;

Marketing technology platforms and suppliers;

In the case of Candidates: potential employers and other recruitment agencies/organisations to increase your chances of finding employment;

In the case of Candidates and our Candidates' and prospective members of Staff's referees: third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;

If waywise GmbH merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

### **How do we safeguard your personal data?**

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access.

We take appropriate technical measures in accordance with Art. 32 GDPR, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing as well as the different likelihood and severity of the risk to the rights and freedoms of individuals and organisational measures to ensure a level of protection appropriate to the risk.

Measures include, in particular, ensuring the confidentiality, integrity and availability of data by controlling physical access to the data, as well as the access, input, transfer, availability and segregation.

In addition, we have established procedures that ensure the provision of data subject rights, data erasure and data vulnerability. Furthermore, we consider the protection of personal data during the process of development, or selection of hardware, software and procedures, according to the principle of data protection (Article 25 GDPR).

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately. Details of how to contact us can be found [here](#).

### **How long do we keep your personal data for?**

We will Delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for two years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services. If you are a Candidate we will consider there to be meaningful contact with you if you submit your updated CV or take part in any of our trainings. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

### **How can you access, amend or take back the personal data that you have given to us?**

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

Details of how to contact us can be found [here](#). We will seek to deal with your request without undue delay, and in any event within 30 days of notice (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

**Right to object:** this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to our Website Users, Candidates, Clients, Cooperation partners and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

we can show that we have compelling legitimate grounds for processing which overrides your interests; or

we can show that we have compelling legitimate grounds for processing which overrides your interests; or

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

**Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing measures), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

**Data Subject Access Requests (DSAR):** You may ask us to confirm what information we hold about you at any time, and request us to modify, update or Delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

**Right to erasure:** You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

the data are no longer necessary for the purpose for which we originally collected and/or processed them;

where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;

the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);

it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or

if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

Where your data are not being processed in an automated way, unless your data are being processed unlawfully, we will not be required to erase your data if erasure would be impossible or would involve a disproportionate effort due to the specific method of storage, provided that we think your interest in erasure is minimal.

Where your data are being processed in an automated way, we will also have the right to refuse to erase your data if we have reason to believe that such erasure will adversely affect your legitimate interests, or if such erasure would cause us to breach any legal obligation to retain your data for a specific period. Instead, in these circumstances, processing of your data will be restricted in the particular ways envisaged by the GDPR.

We would only be entitled to refuse to comply with your request for one of the following reasons:

to exercise the right of freedom of expression and information;

to comply with legal obligations or for the performance of a public interest task or exercise of official authority;

for public health reasons in the public interest;

for archival, research or statistical purposes; or

to exercise or defend a legal claim.

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to Delete the relevant data.

**Right to restrict processing:** You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;

where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;

where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and

where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

**Right to rectification:** You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

**Right of data portability:** If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer your waywise GmbH account details to another service provider. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another service provider. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

**Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority. Details of how to contact them can be found [here](#).

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us can be found [here](#). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

### **Will your data be transferred to countries outside the European Union?**

If we process data in a country outside the European Union (EU) or the European Economic Area or in the context of the use of third party services or disclosure or transmission of data to third parties, this is done only if it is required to fulfil our (pre) contractual obligations, on the basis of your consent, due to a legal obligation or based on our legitimate interests. As waywise GmbH's service is focused on international collaboration, this is often the case.

In order to provide you with the best service and to carry out the purposes described in this Privacy Policy, your data may be transferred:

to third parties (such as advisers, Cooperation partners or other Suppliers to the waywise GmbH business);

to overseas Clients;

to Clients within your country who may, in turn, transfer your data internationally.

to a cloud-based storage provider.

Subject to legal or contractual permissions, we process or have the data processed in a third country only in the presence of the special conditions of Art. 44 et seq. DSGVO. This means that the processing is e.g. on the basis of specific guarantees, such as the officially recognized level of data protection (eg for the US through the Privacy Shield) or compliance with officially recognized special contractual obligations (so-called "standard contractual clauses").

Furthermore, we use third-party providers for the hosting, administration and design of our website and online scheduling tools who may transfer your personal data to a country outside the European Union (EU) or the European Economic Area. These third-party providers may also collect your personal data when you visit our website. More information on the third-party providers we use can be found [here](#).

### **Who is responsible for processing your personal data on the waywise GmbH website?**

Our Data Protection Officer is Jana Köhler.

Email: [info@waywise GmbH.de](mailto:info@waywise GmbH.de)

Address:

waywise GmbH  
c/o Factory Works GmbH  
Rheinsberger Str.76/77  
10115 Berlin

If you have any comments or suggestions concerning this Privacy Policy please contact us. You can find additional information on how to contact us [here](#). We take privacy seriously so we'll get back to you as soon as possible.

## Cookies policy

### What's a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. We also provide information about this in our Marketing preferences page on the waywise GmbH website.

### How do we use cookies?

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need.

The table at [Annex 3](#) lists the cookies we use in your jurisdiction, why we use them and what types of cookies they are.

### What types of cookies exist?

**Session cookies:** these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or

**Persistent cookies:** a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see below).

### Cookies can also be categorised as follows:

**Strictly necessary cookies:** These cookies are essential to enable you to use the website effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

**Performance cookies:** These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

**Functionality cookies:** These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have



requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.

**Personalisation cookies:** These cookies help us to advertise details of potential job opportunities that we think may be of interest. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for jobs that are similar to jobs that you have previously browsed.

The table at [Annex 3](#) lists the cookies we use in your jurisdiction, why we use them and what types of cookies they are.

### **How to reject cookies**

If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings

Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

For more information generally on cookies, including how to disable them, please refer to [www.aboutcookies.org](http://www.aboutcookies.org). You will also find details on how to delete cookies from your computer.

## **OUR LEGAL BASES FOR PROCESSING YOUR DATA**

### **LEGITIMATE INTERESTS**

Article 6(1)(f) of the GDPR is the one that is relevant here – it says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

We don't think that any of the following activities prejudice individuals in any way – in fact, they help us to offer you a more tailored, efficient service, so everyone's a winner! However, you do have the right to object to us processing your personal data on this basis. If you would like to know more about how to do so, please click [here](#).

### **CANDIDATE DATA:**

We think it's reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information with prospective employers and assess your skills against our bank of vacancies. Once it's looking like you may get the job, your prospective employer may also want to double check any information you've given us or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws. We need to do these things so that we can function as a profit-making business, and to help you and other Candidates get the jobs you deserve.

We want to provide you with tailored job recommendations and relevant articles to read to help you on your job hunt. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content.

We also think that it might help with your job search if you take part in one of our trainings or some of our more interactive services, if you have the time.

We have to make sure our business runs smoothly, so that we can carry on providing services to Candidates like you. We therefore also need to use your data for our internal administrative activities, like payroll and invoicing where relevant.

We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting! If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

#### **CLIENT DATA:**

To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, requested offers, registered jobs and placements as well as feedback on our services. From time to time, we may also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

#### **COOPERATION PARTNERS and SUPPLIER DATA:**

We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Cooperation partners or Suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

#### **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES SUCH AS REFEREES:**

If you have been put down by a Candidate or a prospective member of Staff as one of their referees, we use your personal data in order to contact you for a reference. This is a part of our quality assurance procedure and so we deem this to be necessary for our legitimate interests as an organisation offering recruitment services and employing people ourselves.

#### **CONSENT**

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:

you have to give us your consent freely, without us putting you under any type of pressure;

you have to know what you are consenting to – so we'll make sure we give you enough information;

you should have control over which processing activities you consent to and which you don't. We provide these finer controls; and

you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We will keep records of the consents that you have given in this way.

We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the recruitment services we provide as long as you do not actively opt-out from these communications.

As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found [here](#).

## **ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS**

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

## ANNEX

### Annex 1: How to contact us

The country in which you use waywise GmbH' services or supply waywise GmbH with services is Germany.

How you can get in touch with us:

to access, amend or take back the personal data that you have given to us;

if you suspect any misuse or loss of or unauthorised access to your personal information;

to withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data);

with any comments or suggestions concerning this Privacy Policy

You can write to us at the following address:

waywise GmbH  
c/o Factory Works GmbH  
Rheinsberger Str.76/77  
10115 Berlin  
Germany

Alternatively, you can send an email to our Data Protection Officer Jana Koehler:

[info@waywise GmbH.de](mailto:info@waywise GmbH.de).

If you want to update your marketing preferences please email us at: [info@waywise GmbH.de](mailto:info@waywise GmbH.de) or click the unsubscribe link in case of newsletters.

### Annex 2: How to contact your local supervisory authority

The country in which you use waywise GmbH' services or supply waywise GmbH with services is Germany.

Contact details of the Berlin supervisory authority for data protection and information freedom can be found here: <https://www.datenschutz-berlin.de/>

### Annex 3: Cookies list (website)

We use cookies to run our website and obtain information about our visitors for Squarespace Analytics and Google Analytics. To make sure that we do not collect any of your personal data without your agreement, we have added a cookie banner to our website where we ask for your consent to the collection of cookies.

The list of cookies used by our third party providers is updated frequently. In order to provide you with the most current information, we have created an overview where you can access all lists of cookies we use:

Provider	Type of cookies used	Purpose, type and duration	Full overview
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<b>Squarespace</b>	Functional and required cookies	<p>We use Squarespace for our website building and hosting including the scheduling and payment of services.</p> <p>Squarespace uses some necessary cookies because they allow visitors to navigate and use key features on our website. These cookies vary from site to site depending on the features we use. For example, Functional and Required Cookies help these features work:</p> <ul style="list-style-type: none"> <li>• Customer accounts</li> <li>• Shopping cart and checkout</li> <li>• URL redirects</li> </ul>	<a href="https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses">https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses</a>
<b>Squarespace</b>	Analytics and performance cookies	<p>We use Squarespace for our website building and hosting including the scheduling and payment of services.</p> <p>Squarespace uses Analytics and Performance cookies to collect information on our behalf about how visitors interact with our site. Based on the storage of these cookies, Squarespace generates data such as traffic sources, unique visitors, and cart abandonment which waywise GmbH uses to optimize its website and customer experience.</p>	<a href="https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses">https://support.squarespace.com/hc/en-us/articles/360001264507-The-cookies-Squarespace-uses</a>
<b>Google Analytics</b>	Analytics cookies	<p>Google Analytics is Google's analytics tool that helps us understand how our website visitors engage with our properties. It may use a set of cookies to collect information and report site usage statistics without personally identifying individual visitors to Google. The main cookie used by Google Analytics is the '_ga' cookie.</p> <p>In addition to reporting site usage statistics, data collected on Google properties by Google Analytics may also be used, together with advertising cookies, to help show more relevant ads on Google properties (like Google Search) and across the web and to measure interactions with the ads we show on our website.</p>	<p>General types of cookies used by Google:  <a href="https://policies.google.com/technologies/types?hl=en">https://policies.google.com/technologies/types?hl=en</a></p> <p>Specific details on cookies used by Google Analytics:  <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=en">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=en</a></p>

#### Annex 4: Third-party providers (website)

Provider	Data processing for waywise GmbH	Description	Further information
<b>STRATO</b>	Domain Hosting	When our website is visited by you, your IP address is recorded and stored in log files. Visitors' IP addresses are stored by STRATO for up to seven days to detect and prevent attacks.	<a href="https://www.strato.de/faq/article/2763/Fragen-zur-Auftragsverarbeitungsvertrag-AVV-und-der-neuen-EU-Datenschutzgrundverordnung-DSGVO.html#verarbeitung">https://www.strato.de/faq/article/2763/Fragen-zur-Auftragsverarbeitungsvertrag-AVV-und-der-neuen-EU-Datenschutzgrundverordnung-DSGVO.html#verarbeitung</a>
<b>Squarespace</b>	Website building and hosting & Acuity scheduler	We use Squarespace for our website building and hosting including the scheduling and payment of services. Squarespace is a service by Squarespace Inc., based in the US, and has self-certified to the EU-US and Swiss-US Privacy Shield, which allows Squarespace to lawfully transfer EU and Swiss personal data to the US, including to its US-based data centers. You can read more about Squarespace's Privacy Shield certifications <a href="#">here</a> .	<a href="https://www.squarespace.com/data-privacy">https://www.squarespace.com/data-privacy</a>
<b>Google</b>	Google Web Fonts	On our website we use Google Fonts. Google Fonts is a service of Google Inc. ("Google"). These web fonts are integrated via a server call - usually to a Google server in the USA. Hereby, information on which of our web pages you have visited is transferred to the server. In addition, the IP address of the browser of the terminal of the visitor of this website is stored by Google.  Google operates servers around the world. Therefore, your data may be processed on servers located outside the country which you live in. Regardless of where your data is processed, Google generally applies the same protections as described in the Google Privacy Policy. Google also adheres to certain legal frameworks for data transfers, such as the EU-US Privacy Shield Agreement, and between Switzerland and the US.	<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>
<b>Google</b>	Google Analytics	We use Google Analytics to analyse the use of our website. Google Analytics is a service of Google Inc. ("Google"). Google Analytics gathers information about website use by means of cookies.	<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>

		The information gathered relating to our website is used to make the use of our website easier for you and find out what interests our website users the most.	
<b>Stripe</b>	Online payment application (used when booking online our website)	<p>If you book and pay for a service on our website, you will have the option to pay via credit card. In this case, Stripe will receive your transaction information. The information that Stripe collects will include payment method information (such as credit or debit card number, or bank account information), purchase amount, date of purchase, and payment method. Depending on which of the offered payment method you choose, the different payment methods may require the collection of different categories of information.</p> <p>Stripe Inc. complies with applicable laws to provide an adequate level of data protection for the transfer of your Personal Data to the US. Stripe Inc. is certified under the EU-U.S. and the Swiss-U.S. Privacy Shield Framework and adheres to the Privacy Shield Principles.</p>	<a href="https://stripe.com/de/privacy">https://stripe.com/de/privacy</a>
<b>PayPal</b>	Online payment application	<p>If you book and pay for a service on our website, you will have the option to pay via PayPal. If you select PayPal as a payment option during the booking process, your data will be automatically transmitted to PayPal. By selecting this payment option, you consent to the transmission of personal data required for payment processing.</p> <p>The personal data transmitted to PayPal are usually first name, last name, address, e-mail address, IP address, telephone number, mobile phone number or other data necessary for the processing of the payment. Personal data that is necessary for the processing of the purchase contract is also data that is related to the respective order.</p>	<a href="https://www.paypal.com/us/webapps/mpp/ua/privacy-full">https://www.paypal.com/us/webapps/mpp/ua/privacy-full</a>
<b>Mailchimp</b>	Newsletter account	<p>If you sign up for our newsletter, your data such as name and email address will be stored in our Mailchimp account. Mailchimp is owned and operated by The Rocket Science Group LLC ("Mailchimp"). Mailchimp is headquartered in and has offices in the United States. Mailchimp's servers are also located in the United States. This means that processed data may be transferred to, stored, or processed in the United States.</p> <p>Mailchimp is certified under the EU-U.S./Swiss-U.S. Privacy Shield Frameworks.</p>	<a href="https://mailchimp.com/legal/privacy/">https://mailchimp.com/legal/privacy/</a>





## GLOSSARY

**Candidates:** Includes applicants for all roles advertised or promoted by waywise GmbH, including permanent, part-time and temporary positions and freelance roles with waywise GmbH' Clients; people who have supplied a speculative CV to waywise GmbH not in relation to a specific job as well as people who have filled in a waywise GmbH application form at one of waywise GmbH's Cooperation partners.

**Clients:** While it speaks for itself, this category covers our customers, clients, and others to whom waywise GmbH provides services in the course of its business. We distinguish between two kinds of services we provide to our clients:

Consulting and recruitment services for Organisations (i.e. Companies, Universities, Associations): This refers to i.e. consulting and recruitment services such as: National and international recruitment incl. candidate search, international branding strategies and channels, international organizational, personnel and team development, intercultural training or organizational support for international assignments. These services are tailor-made for the individual needs of the client. Counselling and training services (mainly for Individuals): This refers to all our counselling and training services i.e. for career guidance, application checks or interview trainings you can book with us online through our website.

**General Data Protection Regulation (GDPR):** A European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any

**Staff:** Includes employees and interns engaged directly in the business of waywise GmbH (or who have accepted an offer to be engaged) as well as certain other workers engaged in the business of providing services to waywise GmbH (even though they are not classed as employees). Independent contractors and consultants performing services for waywise GmbH fall within the definition of a 'Supplier' for the purposes of this Privacy Policy.

**Cooperation partners and Suppliers:** Refers to partnerships and companies (including sole traders), and atypical workers such as independent contractors and freelance workers, who provide services to waywise GmbH. In certain circumstances waywise GmbH will sub-contract the services it provides to Clients to third party suppliers who perform services on waywise GmbH' behalf. In this context, suppliers that are individual contractors, freelance workers, or employees of suppliers will be treated as Candidates for data protection purposes. Please note that in this context, waywise GmbH requires Cooperation Partners and Suppliers to communicate the relevant parts of this Privacy Policy (namely the sections directed at Candidates) to their employees.

**Website Users:** Any individual who accesses any of the waywise GmbH websites.