Privacy Information

for employees and applicants pursuant to Articles 13, 14 and 21 GDPR, including information on joint controllership pursuant to Article 26 GDPR

Version: 26 September 2026

Dear Employee, Dear Applicant,

This privacy information explains how personal data is processed in connection with your application and with the establishment, performance and termination of an employment relationship. Depending on the specific processing activity, FLEXiCODE GmbH may act as the sole controller, as a joint controller with other companies of the FLEXiCODE Group, or may engage other companies or service providers as processors. The actual arrangements for the specific processing activity are decisive in each case.

1. Controller

Unless joint controllership exists pursuant to Section 7, the controller within the meaning of the General Data Protection Regulation is:

FLEXiCODE GmbH

Address: Kurgartenstraße 37, 90762 Fürth, Deutschland

Telephone: +49 911 477 156 60

Email: info@flexicode.net

Website: www.flexicode.net

2. Data Protection Officer

You can contact our Data Protection Officer at: Dipl.-Ing. Jörg Hagen, Jhcon Datenschutzberatung, Königstraße 50a, 30175 Hannover. Data protection enquiries may also be sent using the FLEXiCODE GmbH contact details provided above.

3. Purposes and Legal Bases of Processing

We process personal data in accordance with the GDPR, the German Federal Data Protection Act (BDSG) and other applicable data protection regulations. Depending on the processing activity, the following purposes and legal bases may apply in particular:

- Processing for decisions on establishing an employment relationship and, after its establishment, for performing or terminating the employment relationship, insofar as this is necessary for these

purposes (Section 26(1) BDSG; supplemented by Article 6(1)(b) GDPR). This includes in particular application and selection procedures, personnel administration, deployment and task planning, remuneration, payroll processing and the organisational administration of the employment relationship.

- Compliance with statutory, employment, tax, social security or other legal obligations and the exercise of statutory rights (in particular Article 6(1)(c) GDPR in conjunction with the applicable provisions). Special categories of personal data may be processed insofar as this is permitted and necessary under Article 9 GDPR and Section 26(3) BDSG.
- Pursuit of the legitimate interests of FLEXiCODE GmbH, other companies of the FLEXiCODE Group or third parties, particularly in efficient group-wide organisation and administration, IT and information security, access and authorisation management, prevention of misuse and fraud, internal communication, and the establishment, exercise or defence of legal claims (Article 6(1)(f) GDPR), provided that the interests or rights of the data subject do not override those interests.
- Processing based on consent for expressly specified purposes (Article 6(1)(a) GDPR, where applicable in conjunction with Section 26(2) BDSG or Article 9(2)(a) GDPR). Consent may be withdrawn at any time with effect for the future.
- Inclusion in the applicant pool:
- If we do not offer you a position, you may have the option of being included in our applicant pool. If you are included, all documents and information from your application will be transferred to the applicant pool so that we can contact you if suitable vacancies arise. Inclusion in the applicant pool takes place exclusively on the basis of your express consent (Article 6(1)(a) GDPR). Giving consent is voluntary and is unrelated to the ongoing application process. You may withdraw your consent at any time. In that case, the data will be permanently deleted from the applicant pool unless statutory retention grounds apply.

Membership of a corporate group or the use of a shared system does not in itself constitute a legal basis. The applicable legal basis must be determined separately for each specific processing activity.

4. Use of AI-Supported Applications

For the purposes stated above, purpose-specific AI-supported applications may be used, for example to structure, analyse, summarise and prepare information or to support administrative personnel and application processes. Personal data arising in connection with an application or employment relationship may be processed in this context. The application used in each case is integrated in accordance with the roles, authorisations and data protection requirements applicable to the specific processing activity.

As a rule, no decision based solely on automated processing that produces legal effects or similarly significantly affects you within the meaning of Article 22 GDPR takes place. If such processing is used in an individual case, we will provide separate information in accordance with the statutory requirements.

5. Categories of Personal Data

Depending on whether you are applying to us or are employed by us, the following categories of data may be processed in particular:

- Master and contact data, e.g. name, address, date of birth, telephone number, private or business email address and, where applicable, personnel number;
- Application, qualification and selection data, e.g. CV, certificates, education and professional experience, information on knowledge and qualifications, and interview and selection records;
- Employment, contract, organisational and performance data, e.g. employment contract, function, organisational assignment, working time, absence, leave, project and activity data;
- Remuneration, payroll, tax, social security and bank data, as well as other information required for payroll accounting and statutory reporting obligations;
- Communication, usage, access, log and technical metadata generated when using our communication tools, IT systems, applications, devices and portals;
- Where necessary and legally permissible, special categories of personal data as well as other data that you provide to us in connection with the application or employment relationship.

6. Sources of Data

We obtain personal data primarily directly from you, e.g. from application documents, personnel questionnaires, employment contracts, emails, conversations, forms and ongoing communication and collaboration. In addition, where legally permissible and necessary for the relevant purpose, we may obtain data from publicly accessible professional sources, recruitment agencies, public authorities, social security institutions, affiliated companies or other authorised bodies.

7. Recipients and Processing within the FLEXiCODE Group

7.1 Internal Recipients and Processors

Within FLEXiCODE GmbH, access is provided only to those departments and persons who require the data to perform their tasks, in particular HR personnel, responsible managers and, depending on the purpose, departments such as IT, Finance or Administration. Where necessary, personal data is also transferred to external service providers, public authorities, social security institutions, tax advisers, banks, insurance companies or other authorised recipients. Where service providers are engaged as processors, processing is carried out on the basis of an agreement pursuant to Article 28 GDPR.

Depending on the specific systems and services used, the following external processors in particular may be engaged:

Service provider	Service / purpose	Place of performance
DBConcepts Deutschland GmbH	IT infrastructure, Microsoft Azure, Oracle databases and hosting	Germany
Schwarz Cloud GmbH & Co. Digits KG (STACKIT)	Technical cloud infrastructure, if used	Germany
Odoo SA	Project management, invoicing, financial accounting, digital signatures and order management, where used in an employment context	Belgium / EU
Microsoft Ireland Operations Ltd	Microsoft 365, SharePoint, email, Copilot and Microsoft Azure	Ireland / EU
Annyway GmbH	In exceptional cases, IFS modules for financial accounting and human resources	Switzerland
IFS Deutschland GmbH	IFS software and support services	Germany
P&I Personal & Informatik AG	Internal payroll accounting, internal time recording and leave requests	Germany

7.2 Affiliated Companies and Role-Dependent Processing

Depending on the specific processing activity, companies of the FLEXiCODE Group may assume different roles under data protection law. In particular, they may act as processors, independent controllers or, where they jointly determine the purposes and essential means of processing, joint controllers pursuant to Article 26 GDPR. Membership of the group alone does not result in joint controllership.

The affiliated companies referred to in these documents include in particular:

Company	Address
FLEXiCODE Group GmbH	Kurgartenstraße 37, 90762 Fürth, Deutschland
FLEXiCODE GmbH	Kurgartenstraße 37, 90762 Fürth, Deutschland
FLEXiCODE Schweiz AG	St. Leonhard-Straße 45, 9001 St. Gallen, Schweiz
Aveso Oy	Lemminkäisenkatu 34, 20520 Turku, Finnland
Curit ApS	Skomagervej 1A, 7100 Vejle, Dänemark

7.3 Joint Controllership pursuant to Article 26 GDPR - Essential Terms of the Arrangement

Joint controllership exists only for specific processing activities for which two or more participating companies jointly determine the purposes and essential means of processing. Under the Group Data Processing Agreement, this may apply in particular to central software, cloud and platform services, group-wide administrative processes and certain shared services, depending on the specific allocation of decision-making responsibilities.

The following principles apply in particular to a specific joint processing activity:

- The participating companies document the specific processing activity and their respective responsibilities. The actual functions and decision-making powers are decisive.
- Where FLEXiCODE Group GmbH is involved in joint processing, it generally acts as the central contact point for enquiries from data subjects and supervisory authorities under the intra-group agreement. Where only other group companies are involved, they designate a joint contact point.
- The central contact point coordinates compliance with information obligations and the handling of data subject rights. The participating companies support one another and provide the required information.
- Each participating company remains responsible for compliance with the data protection obligations applicable to it and for the lawfulness of its processing. The internal allocation of responsibilities does not restrict the statutory rights of data subjects.
- You may exercise your rights under the GDPR against any company participating in the specific joint processing activity, irrespective of the internal allocation of responsibilities.
- In the event of personal data breaches or requests for rectification, erasure or restriction, the participating companies coordinate and support one another in accordance with the procedures established in the Group Data Processing Agreement.

Central contact point where FLEXiCODE Group GmbH is involved in joint processing: FLEXiCODE Group GmbH, Kurgartenstraße 37, 90762 Fürth, Deutschland, email: info@flexicode.net, telephone: +49 911 477 156 60.

8. Transfers to Third Countries

Depending on the specific systems and services used and the companies involved, personal data may also be transferred to, or accessed from, countries outside the European Union or the European Economic Area. According to the available documents, this applies in particular to Switzerland.

Where the European Commission has adopted an adequacy decision for the relevant third country pursuant to Article 45 GDPR, the transfer is made on that basis. In the absence of an adequacy decision, appropriate safeguards pursuant to Article 46 GDPR are used where required, particularly the European Commission's Standard Contractual Clauses and, where applicable, supplementary measures. Derogations pursuant to Article 49 GDPR are used only where the statutory conditions are met.

The applicable transfer mechanisms are documented before the transfer begins and reviewed regularly. Where processors are used, the transfer chain to sub-processors is also taken into account.

9. Retention Period

As a rule, we process and store personal data only for as long as this is necessary for the application process, the performance or termination of the employment relationship, or for the respective additional processing purposes. Application data is deleted after the application process has been completed as soon as it is no longer required; temporary further retention may take place in particular for the establishment, exercise or defence of legal claims. With your consent, application data may be retained for longer for future recruitment. After the end of an employment relationship, statutory retention and documentation obligations as well as limitation periods may require or justify further retention of employee data.

10. Your Rights

Subject to the statutory requirements, you have the following rights in particular:

- Access to your personal data (Article 15 GDPR);
- Rectification of inaccurate data (Article 16 GDPR);
- Erasure of personal data (Article 17 GDPR);
- Restriction of processing (Article 18 GDPR);
- Notification of recipients in the event of rectification, erasure or restriction (Article 19 GDPR);
- Data portability (Article 20 GDPR);
- Objection to processing based on Article 6(1)(e) or (f) GDPR (Article 21 GDPR);
- Withdrawal of consent with effect for the future (Article 7(3) GDPR);
- Lodging a complaint with a data protection supervisory authority (Article 77 GDPR).

Where joint controllership exists pursuant to Article 26 GDPR, you may exercise your rights against any participating joint controller. To facilitate handling, you may contact the central contact point specified in Section 7.3.

11. Right to Object pursuant to Article 21 GDPR

Where we process personal data on the basis of Article 6(1)(f) GDPR, you have the right to object to the processing at any time on grounds relating to your particular situation. We will then no longer process the data concerned unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing serves the establishment, exercise or defence of legal claims.

Where personal data is processed on the basis of Article 6(1)(f) GDPR, the right to object described above applies. Processing of employee or applicant data for direct marketing purposes is not covered by this privacy information.

12. Requirement to Provide Data

The provision of personal data is generally voluntary. However, certain information is required so that we can decide whether to establish an employment relationship, perform an employment relationship or comply with statutory obligations. Without the required data, an application may not be capable of being processed, or an employment relationship may not be capable of being established or properly performed.

13. Automated Decision-Making

As a rule, we do not use solely automated decision-making, including profiling, for decisions on the establishment, performance or termination of an employment relationship where such decision-making produces legal effects concerning you or similarly significantly affects you. If this occurs in an individual case, we will provide separate information in accordance with the statutory requirements.