

Data protection at Kempers Recruiting & Consulting GmbH

Contents:

- 1) Data protection explained
- 2) Technical and organizational protection of electronic data against misuse
- 3) Data secrecy
- 4) Candidate information
- 5) Obtaining permission to store data
- 6) Deletion of personal data
- 7) Employee training
- 8) Data transfer
- 9) Data transfer into customer systems
- 10) Revocation of consent to process data
- 11) Right of appeal
- 12) Right to data transferability
- 13) Marketing emails
- 14) Contact form
- 15) Social media
- 16) Cookies
- 17) Google Maps
- 18) Service provider
- 19) Changes to the privacy policy
- 20) Persons responsible

1) Data protection explained

The protection of personal data is an inherent part of our work as personnel consultants. We are conscious of the need to protect the data that are made available to us for the purposes of recruiting and career advice. As a BDU member, we are committed to complying with European data protection directives.

During the course of our activities, we collect data from people in the sectors of our partners and consultants. This data collection is for the purpose of maintaining a database of candidates for our clients and is therefore a component in our business success.

On the one hand, the data come from freely accessible information sources such as Xing, LinkedIn, Experteer and company websites. The data we collect include first and last names, date of birth, contact details, job title, company, any target functions, skills. These data are collected as part of client projects. The collection of data in our Meffert CRM system is used to identify candidates with particular skills and allows us to contact them on an on-going basis.

On the other hand, we carry out a phone ID to identify suitable candidates in the workplace. During this process, only the first and last name, job title and contact details are collected for the subsequent process of direct contact at the workplace.

When a candidate is approached directly at the workplace, additional data are recorded by telephone to assess the candidate's suitability for a client project, e.g. salary range, mobility, career goals, specific skills. These are recorded electronically for the purpose of maintaining a database for client projects. A direct approach can also be by email and coincide with the collection of data. The data are provided by the candidate him/herself; Kempers Recruiting & Consulting GmbH clearly states here that it is a personnel consultant.

If interested, the candidate sends documents (CV, photo, references) during the course of the project. These are also stored electronically. Electronic approval by the portal [datenschutz-freigabe.de](https://www.datenschutz-freigabe.de) is used for the collection of this data from candidates. The approval is entered automatically in Meffert. If approval is not obtained, the CV, photo and references are deleted at the conclusion of the project. The contact details continue to be stored to use for future idents and for the purpose of maintaining a database for our clients.

We operate in the same way when giving career advice.

We store information on our clients, including contact details, employee names, invoices, project details, activities (emails, phone calls) in order to check the progress of the project.

2) Technical and organizational protection of electronic data against misuse

We take various measures to protect data from unauthorised access and improper use.

The organizational measures include:

- seamless monitoring of operation and access around the clock
- security outside office hours using an alarm system connected to a security service
- storage of the server in a lockable room
- only authorized people have access to the Meffert system
- data storage on our own servers
- continuous back-up of data on separate hardware
- passwords must follow a set format (letters, numbers, special characters), with at least 7 characters and can only be assigned once
- Passwords are changed every 180 days, enforced by IT
- data on laptops are encrypted.

3) Data secrecy

Kempers Recruiting & Consulting GmbH is obliged to maintain data secrecy in accordance with § 5 Federal Data Protection Act (BDSG) and the directives of the GDPR when processing the client's personal data. When processing and using the client's personal data, we only use employees who, in accordance with § 5 BDSG have undertaken in writing to maintain data secrecy. The same condition applies to freelancers and partners.

4) Candidate information/Clients

The candidate/client can at any time obtain details of the data stored about him/her. The data are deleted or blocked immediately and completely upon request.

5) Obtaining permission to store data

After sending personal documents, the candidate is requested by an electronic system for registering permission for storage to give his/her permission (Datenschutz-Freigabe.de). The agreement is automatically stored in Meffert. If permission is declined, the candidate receives a reminder email after 7 days. If he/she does not respond to this, the candidate is informed again about the process. If permission is not received after a reasonable time, the information (CV, references) is deleted. The contact details are retained.

6) Deletion of personal data

The following data are deleted:

- CV/documents/contact details of people not in the working life any more (exclusion: contact details of people acting as tipsters remain in the database)
- CV/documents/contact details of people from areas outside the industry
- CV/documents from candidates older than 60 (exclusion: contact details of people acting as tipsters remain in the database)
- upon request, documents and contact details of individual people
- documents from people who have not given their permission for data storage after a reasonable period.

The deletion of data is the responsibility exclusively of people who have been appointed to do so.

7) Employee training

Once a year, Kempers Recruiting & Consulting GmbH trains/informs its employees about data protection. Freelancers and partners are also trained.

8) Data transfer

Kempers Recruiting & Consulting GmbH sends out CVs or personal data only with the prior permission of the candidate/applicant. The transfer is by email or by storage in the client's application management system. The permission to transfer data is obtained by email or telephone. We draw attention especially to the fact that the transfer of data via the Internet (e.g. communication by email) can be subject to security breaches. It is not possible to protect data 100% from access by third parties. Because Kempers Recruiting & Consulting GmbH collaborates with a number of different clients, it is not practical to use data encryption.

9) Data transfer into client systems

Some companies/clients use an application management system and require Kempers Recruiting & Consulting GmbH to enter the candidate's documents in that system. As described above, Kempers Recruiting & Consulting GmbH obtains prior written or verbal permission for this from the candidate.

10) Revocation of consent to process data

Candidates and clients can at any time revoke consent already given. All they need to do is send an informal message by email to Kempers Recruiting & Consulting GmbH. The legality of data processing before revocation remains unaffected by revocation.

11) Right of appeal

In the event of breaches of data-protection law, the person involved has the right to appeal to the competent supervisory authority.

12) Right to data transferability

Candidates and clients have the right to allow data that Kempers Recruiting & Consulting GmbH processes on the basis of their consent or to fulfil our business purpose to be provided to third parties in a standard format. If the direct transfer of data to a responsible person is requested, this will be done if it is technically feasible to do so.

13) Marketing emails

Kempers Recruiting & Consulting GmbH sends out emails to inform candidates and clients about recruiting or career advice topics. We also send emails with dates for free webinars. This can be stopped at any time by sending us a simple email. Prior consent can be revoked at any time. The legality of data processing before revocation remains unaffected by revocation. For the emails Kempers Recruiting & Consulting GmbH uses Meffert.

14) Contact form

If Kempers Recruiting & Consulting GmbH receives applications or registrations for webinars via the contact form, the information from the application form and the contact details are stored for processing. This information is not transferred without prior permission.

Consent to store the data can be revoked at any time; a simple email message is sufficient. Data entered via the website remain with Kempers Recruiting & Consulting GmbH until deletion is requested, consent to storage is revoked or the purpose of the data storage no longer applies. The legality of data processing before revocation remains unaffected by revocation.

15) Social media

The sites of Kempers Recruiting & Consulting GmbH contain the social media buttons of social networks LinkedIn and Xing. The links are constructed in such a way that they must be activated before contact to the particular site in the social network is established. Clicking on these buttons (e.g. in order to view profiles of consultants) establishes a connection to the relevant network(s). The operators are informed that visitors have accessed our Internet site from their IP address. Kempers Recruiting & Consulting GmbH would like to point out that we have no knowledge of the content of the transferred data or its use by LinkedIn and Xing. Kempers Recruiting & Consulting GmbH refers to the data protection provisions of these providers.

16) Cookies

The Internet site uses cookies that do no damage to the visitor's computer. Most cookies are deleted after the visit but some remain on end devices until they are deleted there. End devices can be set to inform about cookies and/or to delete these automatically. The deactivation of cookies may limit the functionality of the website.

Cookies required for the execution of an electronic communication process or the provision of desired functions (notifications of webinars) are stored. Cookies for the analysis of user surfing behavior are not used.

17) Google Maps

The Internet site of Kempers Recruiting & Consulting GmbH uses Google Maps. By using the website, the visitor declares that he/she agrees to the collection, processing and use of automatically collected data by Google Inc, its representatives and third parties. The terms of use of Google Maps can be found here: http://www.google.com/intl/de_de/help/terms_maps.html.

18) Service provider

Kempers Recruiting & Consulting GmbH collaborates with a variety of service providers.

Contracted service providers		
Name	Address	Purpose of data processing
Meffert Software GmbH & Co.KG	Daimlerring 4, 65205 Wiesbaden	Programming and maintenance of Meffert software, Datenschutz-Freigabe.de
Steen Harbach AG	Alte Garten 60, 51371 Leverkusen	Hardware and software maintenance, incl. data back-up
EDV-Service Wolfgang Pallasch	Kurt-Schumacher Str. 9, 40764 Langenfeld	Processing salaries, accounts
Consulting 1x1 GmbH	Campusallee 4, 51379 Leverkusen	Web hosting
Ohlig Dienstleistung GmbH & Co.KG	Borsigstr. 17, 51381 Leverkusen	Destruction of data files
Hogrefe Verlag GmbH & Co.KG	Herbert-Quandt-Str. 4, 37081 Göttingen	Test systems (BIP, BOMAT, I-S-T 2000 R)
Schuhfried GmbH	Hyrtlstr. 45, AT-2340 Mödling	SMART test system
Dickinger, Christiane	privat	
Kempers, Andreas	privat	

User service providers		
Name	Address	Purpose of data processing
Experteer GmbH	Lenbachplatz 3, 80333 Munich	Search for candidates, publication of job advertisements
Google LLC	Mountain View, California, USA	Search function / Google Maps
LinkedIn Ireland Unlimited Company	Wilton Place, Dublin 2, Ireland	Search for candidates, jobs, publication of job advertisements, buttons on profiles
Xing AG	Dammtorstraße 30, 20354 Hamburg	Search for candidates, jobs, publication of job advertisements, buttons on profiles
Textkernel BV.	Nieuwendammerkade 26A-5, 1022 AB Amsterdam, Netherlands	Use of Jobfeed software to search for job advertisements
Scheelen AG	Klettgastr. 21, 79761 Waldshut-Tiengen	Testsystem Insights

The companies Meffert Software GmbH, EDV-Service Wolfgang Pallasch, CBK GmbH Consulting 1x1 and Ohlig Dienstleistung are bound by the data protection conditions. The other service providers have no access to our database. All data used by these providers are entered by the candidates/clients themselves. The data protections regulations of these service providers apply.

19) Changes to the privacy policy

We reserve the right to make changes at any time in order to ensure that Kempers Recruiting & Consulting GmbH always complies with the current legal requirements. This also applies in the event of the data protection declaration having to be modified because of new or revised services.

20) Persons responsible

Persons responsible in accordance with Art. 30, para. 1 a GDPR

1.	Person responsible	Kempers Recruiting & Consulting GmbH Brückenstrasse 2 51379 Leverkusen Tel: 02171-3635-0 info@k-p-p.de www.k-p-p.de	Art. 4 no. 7 GDPR
2.	Legal representative	Michael Kempers CEO Brückenstrasse 2 51379 Leverkusen Tel: 02171-3635-0 Email: kempers@k-p-p.de	
4.	Data protection officer	Inka Kempers Brückenstrasse 2 51379 Leverkusen Tel: 02171-3635-0 Email: i.kempers@k-p-p.de	
5.	Responsible supervisory authority	North Rhine Westphalia	

Contact information

Kempers Recruiting & Consulting GmbH
 Brückenstrasse 2
 51379 Leverkusen
 Tel: +49 2171 3635 0
 Fax: +49 2171 3635 138
 Email: info@k-p-p.de

For questions about Kempers Recruiting & Consulting GmbH data protection, please contact: Inka Kempers

(Version of 01.10.2020)