

**Obligation to information by collecting and processing personal data**  
according to Art. 13 and 14 lit. f GDPR

The following obligation to information according to Art. 13 and 14 lit. f GDPR shall create transparency regarding the handling of personal data by the responsible person (lit. 1). In case of questions you can contact us any time (see section 2.).

**Information according to Art. 13 lit. 1 GDPR**

**1. Who are we and who is processing your data?**

Your data is processed by

Huebner Executive Search Consulting GmbH, Noerdliche Auffahrtsallee 64, 80638 Munich, Germany

Tel: +49 89 1711859-0, Fax: +49 89 1711859-9,

E-Mail [privacy@stefanhuebner.com](mailto:privacy@stefanhuebner.com), Internet [www.stefanhuebner.com](http://www.stefanhuebner.com).

**2. Who can be contacted in case of questions?**

Questions within the context of all legal data protection provisions can be addressed to Huebner Executive Search Consulting GmbH (address see above).

Furthermore, you can contact our data protection officer:

DS Consult + Compliance GmbH, Christian Paulus, E-Mail [privacy@stefanhuebner.com](mailto:privacy@stefanhuebner.com)

**3. For which purposes do we process your personal data?**

Your data is processed for the following purposes:

a) Suppliers

(1) in order to be able to identify you as a supplier

(2) in order to correspond with you

(3) for the execution and fulfilment of the underlying contracts and the execution of precontractual measures with you.

b) Clients

(1) in order to be able to identify you as a client

(2) in order to correspond with you

(3) for invoicing

(4) for the execution and fulfilment of the underlying contracts with you, of your orders and the execution of precontractual measures with you

(5) for search and selection of candidates according to your assignment.

c) Candidates

(1) in order to be able to identify you as a candidate

(2) in order to correspond with you

(3) in order to submit job offers

(4) in order to offer you appropriate positions

(5) for billing or reimbursement purposes, e.g. travel expenses

**4. What is the legal basis for processing your personal data?**

a) Suppliers/ clients

The legal basis for processing personal data results from the underlying contracts with you and the execution of precontractual measures, Art. 6 Para. 1 lit. b GDPR and legal obligations we are underlying Art. 6 Para. 1 lit. c GDPR.

b) Candidates

The legal basis for processing personal data results from your declaration of consent, Art. 6 Para. 1 lit. a GDPR and our legitimate interest, Art. 6 Para. 1 lit. f GDPR. If billing or reimbursement applies, e.g. for travel expenses, the additional legal basis is Art. 6 Para. 1 lit. b and c GDPR.

**5. What is the legitimate interest in processing your personal data?**

As far as a legitimate interest in processing your personal data exists, it is based on the already mentioned purposes, e.g. in order to submit job offers or to offer you appropriate positions etc.

**6. To whom is your personal data transferred to?**

The following recipients can receive your personal data:

- a) Suppliers
  - (1) tax consultants
  - (2) financial authorities, e.g tax office
  - (3) banks (payment transactions)
  - (4) official authorities, as far as a legal obligation for provision of information exists
  - (5) where applicable subcontractors/ processors as part of the order fulfilment according to Art. 28 GDPR
- b) Clients
  - (1) tax consultants
  - (2) financial authorities, e.g tax office
  - (3) banks (payment transactions)
  - (4) official authorities, as far as a legal obligation for provision of information exists
  - (5) potential candidates for positions to be filled in your company
  - (6) where applicable subcontractors/ processors as part of the order fulfilment according to Art. 28 GDPR
- c) Candidates (where applicable)
  - (1) tax consultants
  - (2) financial authorities, e.g tax office
  - (3) banks (payment transactions)
  - (4) official authorities, as far as a legal obligation for provision of information exists
  - (5) potential employers (our clients), as far as you profile matches our client's requirements
  - (6) subcontractors/ processors as part of the order fulfilment according to Art. 28 GDPR

**7. Is there an intention to transmit personal data to third countries?**

There is no intention to transmit your personal data to third countries or to an international organisation.

Candidates: If one of our executive search assignments should require such transmission, we will obtain your consent prior to any transmission. In addition to this you will also receive the necessary information according to GDPR.

**Additional information according to Art. 13, lit. 2, GDPR**

**8. How long will your data be stored?**

Your data will be stored as long as a contract with you is existing, you have declared your consent or as long as it is required according to statutory storage periods, depending on which duration is longer. Statutory storage periods provide a minimum of 10 years.

**9. Which rights do you have (right of information, objection)?**

According to GDPR you have several rights. Details follow from Art. 15 to 18 and 21.

- a) Right of information. You may demand a confirmation from the responsible person whether your personal data is being processed by us.
- b) Right of correction. You have the right to correction and/or completion towards the responsible person, provided the personal data affecting you is incorrect or incomplete.
- c) Right of deletion. You may demand deletion of your personal data. Your entitlement may depend on whether the personal data affecting you are required to fulfil a legal obligation for storage.
- d) Right of limitation. You may demand limitation of processing of your personal data under certain conditions.

- e) **Right of objection.** Based on reasons that result from your own specific situation, you have the right to object to processing personal data affecting you that would take place based on Art. 6 Para. 1 lit. e or f GDPR; this shall also apply to any profiling supported by these provisions.
- f) **Right of data transfer.** You have the right to receive personal data affecting you that you have been providing to the responsible person in a structured, conventional, machine-readable format.
- g) **Right of complaint.** If you are of the opinion that processing personal data affecting you is violating the GDPR or that we have not or not fully fulfilled our obligations, you may complain to the supervisory authority. This right exists regardless other effective remedies.  
The supervisory authority responsible for our company is:  
Bayerisches Landesamt für Datenschutzaufsicht (BayLDA), Promenade 27 (Schloss), D-91522 Ansbach, Germany Tel. +49 981 531300, Telefax +49 981 53981300, E-Mail poststelle@lda.bayern.de, Internet www.lida.bayern.de

**10. Withdrawal of your consent to data processing according to Art. 6 Art. 1 lit. a or Art. 9 Abs. 2 lit. a**

You have the right to withdraw your declaration of consent to data processing at any time. By withdrawing your consent, the legality of processing that has taken place based on consent until its withdrawal, shall not be affected.

**11. Is there an obligation for provision of personal data and are there consequences if they will not be provided?**

If you will not provide certain personal data, we cannot agree on, conduct or terminate the contract, parts of the contract or search assignments with you. According to legal obligations you need to provide certain data to enable us to fulfil the contracts we have closed with you, e.g. according to commercial or fiscal legislation.

**12. Do automated decision making or profiling take place?**

*Automated decision making or profiling are not part of our procedures.*

**Additional information according to Art. 14 GDPR:**

**13. Where is your data generated from?**

Your data is generated from the following sources:

- a) Suppliers, clients
  - (1) from yourself
  - (2) referrals
- b) Candidates
  - (1) from research partners assigned by us
  - (2) from yourself

**14. Is your data generated from public sources?**

Your data might be generated from the following public sources:

- a) Suppliers, clients
  - (1) Free accessible internet content (e.g. business register, your website)
  - (2) Press releases
  - (3) Telephone directories, also online
- b) Candidates
  - (1) Press releases
  - (2) Free accessible internet content incl. Social networks, e.g. Xing, LinkedIn etc.
  - (3) Telephone directories, also online.