



# HIVEMQ

## Privacy Notice for Job Posting

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Document Author	Dhawal Desai, CISO
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<b>1. Introduction</b>	<b>3</b>
<b>2. Responsible Entity</b>	<b>3</b>
<b>3. What Personal Data do we collect</b>	<b>3</b>
<b>4. How do we use your Personal Data</b>	<b>4</b>
<b>5. Legal requirements to process Personal Data</b>	<b>4</b>
<b>6. How do we share your Personal Data</b>	<b>4</b>
<b>7. How do we process your Personal Data</b>	<b>5</b>
<b>8. Transfer of your data abroad</b>	<b>5</b>
<b>9. Your data protection rights</b>	<b>6</b>
<b>10. Deletion and retention periods</b>	<b>7</b>
<b>11. Changes to this Privacy Notice</b>	<b>7</b>
<b>12. Contact Us</b>	<b>7</b>

# Document Control

The following table records information regarding released versions of this document and briefly describes the changes made to them.

**Note:**

1. The latest version of this document is stored electronically.
2. Any printed copy is an uncontrolled copy for reference or training purposes only.
3. This document is not for release to external parties without approvals.

## Approval History

Version	Date	Created By	Approved By	Changes
Draft	12.Jan.2023	Information Security Team		First Release
1.0	09.Mar.2023		Marc Dressel	Reviewed the changes.

## Reviewer History

Version	Date	Reviewed By	Changes/Remark/Feedback
Draft	28/02/2023	Maxim Letski	Changed various paragraphs in order to make them GDPR compliant
Draft	01.Mar.2023	Alexander Old...	Updated section 6 of the document.

# 1. Introduction

In the following Privacy Notice we shall inform you according to Art. 13 para. 1 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”) about the collection, use and processing of your personal data in connection with your job application process with HiveMQ GmbH (“HiveMQ”). This Privacy Notice describes how we collect, use, and disclose your personal information when you apply for a job.

## 2. Responsible Entity

The responsible entity for the processing of your personal data under this policy is:

For EMEA	For Americas
HiveMQ GmbH Ergodinger Straße 2A 84030 Landshut	HiveMQ Inc. 600 N Broad Street, Suite 5 #553 Middletown DE 19709 USA

If you have any questions concerning this Privacy Notice or our data protection procedures, you can contact us at any time by email. Please refer to [contact us](#) section of the document.

## 3. What Personal Data do we collect

In this context, personal data means all detailed information about personal or factual circumstances of a specific or identifiable natural person, such as e.g. your name, your telephone number or your address. Your data will only be transmitted to third parties, if this is necessary for the performance of your employment contract or if you have previously consented to this by written consent. We may collect the following types of personal data:

- Your name, address, email address, and phone number.
- Your job application documents, such as your CV, cover letter, and references.
- Your employment contract and other employment-related documents.
- Information about your job performance, disciplinary records, and appraisals.
- Information about your salary, benefits, and other employment-related payments.
- Information about your health and disability status, if relevant for your job.

## 4. How do we use your Personal Data

We use your personal data for the following purposes:

- To manage your job application or employment with us.
- To communicate with you about your job application or employment with us.
- To pay your salary, benefits, and other employment-related payments.
- To comply with our legal and regulatory obligations, such as tax and social security obligations.
- To monitor and improve our recruitment and onboarding processes.

## 5. Legal requirements to process Personal Data

We process your personal information on the legal grounds of Art 6 para (1) b) GDPR in conjunction with § 26 para 1) and para 8) BDSG as it is necessary for the decision to establish an employment relationship. This means that your data is processed as necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.

Under certain circumstances we may also process your data on the legal grounds of Art. 6 para (1) a) wherever we are granted your consent or c) and f), in order to meet our legal and regulatory requirements or to pursue our legitimate interests, such as recruitment or onboarding process management and employee performance monitoring.

## 6. How do we share your Personal Data

We may disclose your personal information to the following third parties:

- Our service providers, such as Greenhouse, Talentwall, Personio, Zavy, Google (Drive & Gmail), Slack
  - Greenhouse - In order to provide the online application procedure the recruiting team transfers personal data of candidates to Greenhouse Software Inc., 110th Avenue, New York, NY, 10011, USA, a cloud services provider located in the United States of America and engaged by HiveMQ to help manage its recruitment and hiring process on HiveMQ's behalf.

- Talentwall - In order to do analysis with the aim of continuously improving the Recruitment Process at HiveMQ the data is handled by Talentwall, a product of Crosschq Inc, 145 E Prospect Ave Ste 200, Danville, California, 94526, United States.
  - Personio - Once a candidate is hired, personal data will be transferred to Personio SE & Co. KG Seidlstraße 3 80335, Munich, Germany in order to coordinate the onboarding of the future employee. Personio is also used as the Human Resource Information System at HiveMQ and data will be stored here once the future employee starts with HiveMQ.
  - Zavy - Will become applicable once a candidate is hired and becomes an employee at HiveMQ. In order to conduct performance and onboarding reviews data will be transferred to Zavy GmbH, Herzogspitalstraße 24, 80331, Munich, Germany.
  - Google (Drive & Gmail) - HiveMQ uses the Google G-suite from Google by Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043, United States in order to contact candidates and facilitate the creation of any documents involved in and applicable to the recruitment process.
  - Slack - For internal communication around recruitment and related processes, Slack Technologies LLC, a Salesforce company, 500 Howard Street, San Francisco, CA 94105, United States is used.
- If necessary by law, law enforcement and regulatory authorities.

## 7. How do we process your Personal Data

After application, a candidate's personal data is imported to Greenhouse and the information is strictly used for coordination and scheduling with respect to the recruitment process, which could include scheduling interviews, sending feedback emails or contacting candidates for other reasons related to the recruitment process. Once a candidate is successfully hired their data will be transferred to our internal Platforms used for employee management such as Personio and Zavy.

## 8. Transfer of your data abroad

To the extent that HiveMQ transmits personal data to countries outside the EU, HiveMQ ensures that the recipient of the data guarantees an adequate level of data protection. If data is transferred to the United States, HiveMQ will oblige the recipient to comply with and observe the principles of the Privacy Shield (to recognize minimum standards in the handling of personal data) or HiveMQ will enter into the Standard European Union Model Clauses with the respective recipient.

## 9. Your data protection rights

You are entitled at any time to receive information about your stored personal data, its origin and recipient and the purpose of the data processing.

Furthermore, in the cases listed in §§ 16ff GDPR, you are entitled to the correction, deletion, restriction or data portability of your personal data. HiveMQ hereby points out that corresponding documentation may be requested in order to authenticate a job applicant before its issue, because personal data is not allowed to be issued to unauthorised persons.

If you have granted consent to use data, you may revoke this at any time with effect for the future. Until the date of the withdrawal, data processing remains legally correct.

It is hereby pointed out that in some cases, collection and storage of data regardless of consent may be required by applicable law. In such cases, we will discontinue any further processing and use of your personal data and delete or restrict them, insofar as we are not obligated under statutory provisions to continue to process or in particular to store them.

Please direct all requests for information, queries or revocations regarding data processing via email to [contact@HiveMQ.com](mailto:contact@HiveMQ.com) or in writing to the specified address in Section 2 above.

Notwithstanding the above provisions, you have the right under Art. 77 GDPR to complain to a supervisory authority, if you believe that the processing of your data was unlawful.

You are entitled to the following data protection rights:

- 9.1. *To have access to and obtain a copy of your personal data stored with HiveMQ.*  
If you need a copy of a record stored with HiveMQ, send an email or send a letter to the contact information listed in the document's Contact Us section.
- 9.2. *To correct any errors in your personal information that is stored HiveMQ.*  
If you believe that your personal information stored with HiveMQ is incorrect, please contact us via email or contact the Talent Acquisition Lead to update the record. You can update your record in Greenhouse at any time if you believe the information is inaccurate or out of date.
- 9.3. *To delete your personal data under specified conditions.*  
If a candidate wishes to delete the data from HiveMQ systems, the candidate can do so by reaching out to us (refer to [Contact Us](#) section of the document). When we receive the request, we will delete the data from our HR systems within 15 business days.
- 9.4. If we rely on your consent for the processing of your personal data, you have the right to withdraw your consent at any time.

## 10. Deletion and retention periods

Personal information is kept for 6 months after the candidate submits his or her records. After 6 months, the candidate receives a notification with the option to retain or delete the candidate information from our systems. If the candidate chooses to delete the records, they will be deleted from our systems.

Greenhouse will send an automated reminder every 6 months asking the candidate to confirm if they want HiveMQ to keep the data. The candidate will have the option to request data deletion or allow HiveMQ to keep the data using Greenhouse.

## 11. Changes to this Privacy Notice

This Privacy Notice may be updated from time to time to reflect changes in our data protection practices. Any significant changes to this Privacy Notice will be communicated to you.

## 12. Contact Us

Please contact us ([contact@hivemq.com](mailto:contact@hivemq.com)) or HiveMQ talent acquisition lead you are in touch with via email if you have any questions or issues about this Privacy Notice or our data protection practices.