

DATA PROTECTION INFORMATION
"StartUs.cc" and "StartUs-Insights.com" including all subdomains
of StartUs GmbH

(1)	Processing activities	Operation of career network and job exchange for (registered) customers	
(2)	Controller	StartUs GmbH	
(3)	Contact details of responsible entity for data protection	StartUs GmbH c/o Data Protection Mariahilfer Straße 136 Vienna, Austria info@startus.cc	
(4)	Purposes of data processing <ul style="list-style-type: none"> • on the legal basis of <u>performance or preparation of contracts</u> 	(a)	Operation of an online job platform to compile the interests of potential employees and employers
		(b)	Keeping job advertisements accessible to prospective employees and employers, informing interested parties about suitable offers
		(c)	Provision of communication channels to the controller for servicing the contractual relationship
		(d)	Maintaining and enhancing customer satisfaction and customer retention through an analysis of user behaviour
		(e)	Collecting user data to document reach
		(f)	Recommending jobs and candidates in the following cases: <ul style="list-style-type: none"> • show best matching candidates to a job • show best matching jobs to a candidate • show best matching jobs to a job • show best matching candidates to a candidate
		(g)	Enable network participants to establish and maintain networks
	<ul style="list-style-type: none"> • on the legal basis of the (overriding) <u>legitimate interests of the controller: direct marketing</u> 	(h)	Customer recovery and attracting new customers
		(i)	Dissemination/presentation of advertising for (other) goods and services of the controller by means of direct marketing ("marketing purposes"), to the extent permitted by law
		(j)	Analysis of reader behaviour and personal preferences of customers for the purpose of targeted dissemination of advertising with the aim of avoiding scatter losses (using profiling, see paragraph 9)
(5)	Legal basis for data processing	(1) Online use. Performance of the contract. The use of the career network and job exchange is already based on a contract as defined in Art. 6 (1) (b) GDPR; a registration relationship is established upon registration. Through the use of the social media channels of the controller the primary contractual relationship exists with the respective service provider. (2) Additional services. Consent. The controller will obtain the customer's express	

		consent for specific services (e.g. social media tools, recommender tool). Such consent may be withdrawn at any time with effect for the future.	
(6)	Description of (overriding) legitimate interests for the purposes • of IT security:	The controller will store the IP addresses of its customers for a period of 7 days in order to protect against targeted attacks in the form of server overloads (Denial of Service attacks) or other damage to the systems. The controller has an overriding legitimate interest in such data processing for the purposes of maintaining the functionality of its online services (Recital 49 GDPR).	
(7)	Evaluating personal aspects of the customer (profiling)	Type	Description
		Evaluation of personal interests with regard to jobs	For the purpose of compiling suitable job offers the controller processes and evaluates search and user behaviour, and draws conclusions about specific personal interests. The controller uses those evaluated interests to send the customer targeted job offers.
(8)	Objection to profiling:	The customer may object to the use of his personal data for the purpose of profiling at any time and without having to state reasons. Upon objection the controller will no longer use the customer's personal data for the purposes of profiling.	
(9)	Obligation to provide data	The customer is under no obligation to provide data. Reasonable use of the platform is, however, inconceivable without entering any data.	
(10)	Automated decision-making	The customer is subject to <u>no</u> automated decision-making which would become legally effective vis-à-vis him.	
(11)	Processed types of data	provided by the customer	additionally collected by the controller
		Name/Company name, academic degree	IP addresses (log files)
		Username	Data on the terminal equipment
		Phone number	Browser used
		Email address	Equipment used
		Place of residence or address	Communications protocol
		Title	Information on account use (e.g. date created, number of logins, date of the last request)
		Date of birth	Information on newsletter subscription
			User ID
		Application text	Facebook user ID
		Message contents	Facebook email address
		Password	Facebook profile link
		Curriculum vitae	Date of the last Facebook alignment
		Photo, Video	LinkedIn user ID

		Uploaded data		LinkedIn email address
		Information on the desired job		LinkedIn profile link
		Current occupation, work experience		Date of the last LinkedIn alignment
		Languages and other skills		
		Training and continuing education		
		Contact requests		
		Bookmarked jobs		
(12)	Data sources (to the extent not provided by the customer nor collected by the controller)	Source	Types of data	
		Facebook login:	Email, name, gender, Facebook UID, Facebook link, photo	
		Xing login:	Email, name, gender, Facebook UID, Facebook link, photo	
		Google login:	Email, name, gender, Facebook UID, Facebook link, photo	
		LinkedIn login:	Email, name, sex, Facebook UID, Facebook link, photo, current occupation	
		MailChimp:	IP location, preferred email client, registration source, campaign details (receipt, open, click)	
		Social media channels:		
		Facebook:	Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, https://de-de.facebook.com/about/basics	
		LinkedIn:	LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland, https://www.linkedin.com/legal/impressum	
		Xing	XING SE, Dammtorstraße 30, 20354 Hamburg, Deutschland, https://www.xing.com/imprint	
		Twitter	Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, https://twitter.com/de/tos	
		Google Plus:	Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA	
(13)	External recipients of data:	Processor:		
		Operator of the career network and job exchange : epiqo GmbH, Mariahilfer Strasse 136, 1150 Vienna, Austria		
		Email campaign sending and sending of system emails "MailChimp" (and/or Mandrill): The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA		
		Pipedrive as CRM: Pipedrive Inc, 460 Park Ave South, New York, NY 10016, USA		
		Extracting data from uploaded curricula vitae by "Textkernel": Nieuwendammerkade 28A17, Amsterdam, Noord-holland 1022 AB		

		Analytics tools:		
		Google Analytics (with "anonymize IP"): Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA		
		Cloud and technical services		
		Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany		
		Code Enigma, Smithfield Business Centre., 5 St John's Lane, London, EC1M 4BH, United Kingdom		
		Google G Suite, Google LLC, Googleplex, Mountain View, California, USA		
		WP-Engine for hosting StartUs Magazine: Irongate House, 22-30 Duke's Place, London, EC3A 7LP, United Kingdom		
		All external recipients can be written to and contacted via the controller with regard to questions under data protection law.		
(14)	Transfer to third countries	The following data will be transmitted to countries outside of the EU in connection with data processing:		
		Country	Application	Types of data
		USA	Google	Google Analytics: anonymised IP address, website title, browser-specific information, information about website use Google G Suite (storage): email address, name
		USA	Facebook	Social plug-ins (upon consent using double click): IP address, website title, browser-specific information, information about website use
		USA	LinkedIn	Social plug-ins (upon consent using double click): IP address, website title, browser-specific information, information about website use
		USA	MailChimp	Transmission by email (newsletter): email address, name;
		USA	Mandrill	Transmission by email (system messages): email address, name
		USA	Pipedrive	Online CRM (storage): email address, name, contact number
(15)	Storage period	<u>Non-registered users.</u> Personal data (in particular the IP address) of (non-registered) visitors to the website will be stored for purposes of IT security for a period of 7 days.		
		<u>Registered users:</u> Data on registered users will be processed by the controller on the legal basis stated above for the term of the contractual relationship. Users may edit or delete such data at any time. In any case the use agreement will end upon deletion of the account by the customer or after a period of 7 years of inactivity; this will lead to immediate deletion.		

		<u>Registered employers.</u> Generally, personal data of registered employers will be processed by the controller on the legal basis stated above for another 40 months after termination of the contract (= 36 months for potential contractual claims for damages + max. 4 months service period for a statement of claim) and then deleted (in any case, links to personal data). In any case the use agreement will end after a period of 7 years of inactivity and will lead to immediate deletion.	
(16)	Rights of the data subject	Basis	Contents
		Art 15 GDPR "Access"	The customer shall have the right to obtain confirmation as to whether or not his personal data is being processed.
		Art 16 GDPR "Rectification"	The customer shall have the right to obtain without undue delay the rectification of inaccurate personal data or to have them completed.
		Art 17 GDPR "Erasure"	The customer shall have the right to obtain the erasure of personal data without undue delay as long as the reasons stated in Art 17(1) GDPR are fulfilled.
		Art 18 GDPR "Restriction"	The customer shall have the right to obtain restriction of processing of personal data as long as the reasons stated in Art 18(1) GDPR are fulfilled.
		Art 21 GDPR "Objection"	Objection to profiling. The customer shall have the right to object to processing of his personal data for the purposes of profiling at any time. Objection to direct marketing: The customer shall have the right to object to processing of his personal data for the purposes of direct marketing at any time.
		Art 20 GDPR "Data portability"	The customer shall have the right to receive the personal data concerning him in a structured, commonly used and machine-readable format.
(17)	Right to lodge a complaint	Art 77 GDPR	Each customer shall have the right to lodge a complaint with the supervisory authority if he considers that the processing of personal data relating to him infringes this Regulation.
(18)	Supervisory authority	Austrian Data Protection Authority Wickenburggasse 8-10 1080 Vienna Phone: +43 1 52 152-0 Email: dsb@dsb.gv.at	