



Privacy Notice for OGE Applicant Portal (incl. Information on the Use of Artificial Intelligence (AI) in the Recruiting Process)

Thank you for using our Applicant Portal. This Privacy Notice describes how we process your personal data as part of the application process. We are committed to ensuring that your personal information is protected in compliance with applicable data protection regulations, in particular the General Data Protection Regulation ('GDPR'), which has been in place since 25 May 2018.

Name and address of the controller

The controller within the meaning of the GDPR is Open Grid Europe GmbH, Essen (also referred to hereinafter as 'Open Grid Europe', 'OGE' or 'we').

You can reach us at the following address: Kallenbergstraße 5, 45141 Essen (Germany)

Further information about our company can be found in our legal notice at www.oge.net.

Contact details of the data protection officer

You can reach our company data protection officer at oge-datenschutz@oge.net.

Processed data

We primarily process the following types of personal data, which are either entered directly by you in the Applicant Portal or are contained in documents provided by you:

User ID and password for logging into the Applicant Portal, applicant master data (name, address, date of birth, nationality, etc.), contact details (telephone, email address, etc.), career information (CV with details of school/university education, training, work experience, etc.), performance assessments (references, certificates, etc.), applicant photo and billing information for any cost reimbursements. This information may also include details on special categories of personal data in accordance with Art. 9, para. 1 GDPR, such as information on religious affiliation or health data.

When the Applicant Portal is used, we will also collect certain – predominantly technical – information, which may, however, be categorised as personal data by case law (IP address, browser characteristics, etc.).

Processing purposes

Personal data from your application, which you enter in our Applicant Portal or provide as a document (cover letter, CV, references, etc.), will only be processed by OGE for the purpose of performing and handling the application procedure and assessing the extent to which you are suitable for the position in question. This means that your applicant data has to be processed so that we can decide on the establishment of an employment relationship.



Legal bases of the processing

The legal basis for the above processing is Art. 88 GDPR in conjunction with Section 26 (1) of the Federal Data Protection Act (BDSG-neu). If special categories of personal data are processed, the basis for this is Art. 9 (2) lit. b GDPR.

Recipients of personal data

Within OGE, your personal data is accessible to the relevant HR business partners, recruiters and managers. If you are hired, we will include the data collected from you in our personnel file.

Your data will be stored by a service provider commissioned by us (SmartRecruiters GmbH) on a server within the European Union in accordance with applicable data protection regulations. Your online application data will be encrypted during transmission. There are no plans to transfer the data to third countries.

Storage period

If the application process does not lead to a position being filled, your personal data, including your application documents, will be deleted six months after completion of the recruitment process. If you apply to us again within these six months, the data from your first application will be stored until the last recruitment process has been completed.

Subcontractor (processor)

As part of the recruitment process, OGE uses the following service provider with whom a contractual agreement on order processing has been concluded in accordance with Art. 28 (2) to (4) GDPR:

Subcontractor	Address/country	Service
SmartRecruiters GmbH	Wilhelmstraße 118, 10963 Berlin	Operation of Applicant Portal

Job agent

You also have the option of registering with our job agent. We use the job agent to inform you about new vacancies that match your selection criteria. For this purpose, we store and use your first and last name, your e-mail address and your selection criteria for the vacancies you may be interested in.

The processing of your data and the sending of information about suitable job offers to the e-mail address you have provided is based on your voluntary consent (Art. 6 (1) sentence 1 lit. a GDPR). You may deactivate the search agent at any time by clicking on the unsubscribe link in the email received. Deactivation will be without prejudice to the legality of the processing carried out on the basis of your consent until it has been revoked. If you unsubscribe from the job agent, we will delete the data stored for this purpose.

Talent pool

If you give us your consent to include you in the OGE Group talent pool, we will also consider your application data for other vacancies within the OGE Group. In this case, your personal data provided in the original



application, including your application documents, the position for which you have applied, your desired salary and assessments by HR business partners or recruiters from your interview will be made available to other HR business partners or recruiters and managers of the OGE Group. We will discuss the respective position with you as the applicant in advance.

The legal basis for the processing of your personal data as part of the talent pool is your voluntary consent (Art. 6 (1) sentence 1 lit. a GDPR), which will be obtained separately from you by an HR Business Partner or recruiter.

We will retain your data for the described purpose for a period of two (2) years from the date of your consent and then delete it from the talent pool. You may withdraw your consent at any time with effect for the future by email to oge-datenschutz@oge.net.

Your rights

You can view or change personal data stored on you at any time under the identifier you have selected in the Applicant Portal and assert the rights to which you are entitled under the GDPR by writing to oge-datenschutz@oge.net, provided the legal prerequisites are met. Specifically, these include your right to information, correction, deletion, transfer or restriction of the processing of personal data concerning you. You can also object to the processing of your personal data, and you have the right to lodge a complaint with a supervisory authority.

Use of artificial intelligence (AI) in the recruiting process

OGE uses the SmartAssistant, an AI-supported tool within the SmartRecruiters platform, to assess incoming applications in terms of their suitability for the advertised position and to provide candidate recommendations from the application pool. The aim of this use is to enable faster and high-quality application processes by prioritising and making a high-quality pre-selection in day-to-day business. No candidates are rejected automatically or without being screened by the recruiters.

Purpose of use

The SmartAssistant is based on what is known as the match score, a confidence interval for the suitability of applicants for a specific position. This score is calculated based on the matches with the job advert and serves as the basis for the candidate assessment.

Calculation of the match score

The match score is shown on a scale of 1 to 5 stars, with 4 and 5 stars indicating a good match and 1 to 2 stars indicating a poor match. The score is calculated as soon as the application is received in SmartRecruiters and is recalculated if there are any changes to the content of the job adverts. The calculation of the match score relies exclusively on data from the job title, job description and qualifications fields of a posted job vacancy.

Data protection and security

The processing of personal data in the context of the use of SmartAssistant is carried out in accordance with



the provisions of the GDPR and the EU regulation on artificial intelligence (Regulation 2024/1689; also referred to as the AI Act). By way of a separate agreement with the provider of SmartAssistant, we ensure that all data protection requirements are met, especially in terms of transparency, purpose limitation and data minimisation. Applicants have the right to information, correction, deletion and restriction of the processing of their data as well as the right to data portability and objection.

Non-discrimination and human oversight

It is technically impossible and organisationally prohibited for the SmartAssistant to make discriminatory assessments. The entire process is subject to human oversight to ensure that all decisions are made in a non-discriminatory, fair and transparent manner.

Processing of personal data by the SmartAssistant

SmartRecruiters' SmartAssistant processes personal data in strict compliance with data protection and data security guidelines.

- **Data anonymisation:** All applicant data used for modelling and training the algorithms is anonymised. This means that no personal data such as names, age, gender, ethnicity, email addresses, telephone numbers, employer names or university names are used. This information is removed to avoid potential bias.
- **Data security:** The machine learning models, including the large language models (LLMs), are hosted on SmartRecruiters' cloud infrastructure to ensure data security. This infrastructure is fully compliant with applicable laws and security guidelines.
- **In-house development and data hosting:** SmartRecruiters develops and hosts the models in-house to ensure that no external data is used and clients' data remains secure. The models combine internally developed models, customised open-source models and third-party models.
- **Avoidance of bias:** SmartRecruiters conducts annual independent audits to check for and prevent bias in the models. For example, names of universities and employers are removed from the training data to ensure that no hidden human bias influences the results.
- **Data retention:** The data always remains in the customer's instance at SmartRecruiters. This means that the data is not stored or processed outside the customer's environment.
- **Human decision-making:** SmartRecruiters' AI products do not replace human decision-making in the recruitment process. The scores generated by the AI only serve as support and must not be used as the sole basis for hiring decisions.

Consent and transparency

Applicants are comprehensively informed about how their data is processed by the SmartAssistant. Further information is available directly from the manufacturer SmartRecruiters at [AI-Powered Talent Acquisition Software – SmartRecruiters](#). Express permission for AI to use the data described above is obtained through the applicant's consent to the data protection information before the application process begins. This ensures



that all data protection requirements and all requirements of the AI Act are met and that the rights of applicants are safeguarded.

Open Grid Europe

Data Protection Officer

Last revised: 5 March 2025