



## DOCPLANNER CANDIDATE PRIVACY POLICY

To access this policy in your local language and view any country-specific provisions please follow the relevant links here: ([TR](#), [ES](#), [PL](#), [PT](#), [ITA](#), [BR](#), [MX](#), [DE](#), [COL](#))

### I. INTRODUCTION

At Docplanner we are passionate about what we do.

We are an international group of companies. Transparency is a very important value for our group. For this reason, this policy explains how Docplanner companies process your personal data in the context of a recruiting process.

It also describes your rights under the European Regulation (EU) 2016/679 on personal data ("GDPR") and/or other applicable data protection laws.

This policy serves as our global framework, and while the core principles apply globally across all our operations, please note that additional country-specific provisions may apply depending on your location. Localized privacy notices for the countries where you are applying can be found at the end of this document.

**Please read this policy before submitting an application.** If you have questions or want to exercise your rights you will find how to do it below.

### II. WHO WE ARE

Docplanner is a group of companies with presence in numerous countries in Europe and Latin America.

Our headquarters are based in Barcelona (Spain) and Warsaw, (Poland). See detailed information about our companies:

Spain	Doctoralia Internet S.L., Carrer de Josep Pla 2, Building B2, Floor 13, 08019 Barcelona, SPAIN, tax number : B-62834981
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Poland	ZnanyLekarz sp. z o.o., Kolejowa 5/7, 01-217 Warszawa, Poland, court register: 0000347997
Italy	Docplanner Italy s.r.l. (MioDottore), Piazzale delle Belle Arti n. 2, CAP 00196, Roma, Italy, Registration N. RM - 1493266 TuoTempo s.r.l., via Garibaldi n. 1, CAP 40124, Bologna, Italy, Registration N. BO - 456906
Brazil	Doctoralia Brasil Servicos Online e Software Ltda (Doctoralia Brasil), Rua Visconde do Rio Branco, nº 1488, lojas 05 e 06 - Batel - Curitiba / Parana - CEP: 80420-210, BRAZIL, court register: 3523037030-5
Mexico	Doctoralia México S.A. de C.V., Boulevard Manuel Avila Camacho 118, Piso 19, Col. Lomas de Chapultepec V Sección, Alcaldía Miguel Hidalgo, CP 11000 CDMX, Mexico, court register: N-2017048079
Germany	Jameda GmbH, Balanstraße 71a   81541 München, Germany, court register : Amtsgericht München HRB 168659
Turkey	DocPlanner Teknoloji A.Ş., E-5 Karayolu, Esentepe Mahallesi, Lapis Han, No:25, D:102-103-120,34870 Kartal İstanbul, (postal code:34870), TURKEY, trade register : 843951
Colombia	Doctoralia Colombia, SAS, Tv 23 No. 97 - 73, Municipio: Bogotá D.C., Court register 3911568

To know more about who we are and what we do we recommend that you visit our site at <https://www.docplanner.com/>.

### III. WHO IS THE DATA CONTROLLER OF YOUR DATA?

If you apply or are contacted for a position, the data controller of your data will be the Docplanner entity that is communicating with you. Other companies of the group may also process your data for the purpose of analyzing your vacancy and handling the recruitment process.

“we”, “us”, “Company” or “our” refer to the legal entity that will act as data controller of your data and to companies of Docplanner group that may access your data.

### IV. HOW YOUR PERSONAL DATA IS COLLECTED

We collect your personal data:



- provided directly by you when you apply for a role with us, during your interactions with us (e.g. interviews, and other exchanges) and/or in the course of assessments for that role;
- obtained from third parties such as recruitment agencies, job placement services (*i.e. LinkedIn*), headhunters or an internal Company contact when you are being recommended for consideration for a role. Please note that such third parties may act as independent controller, we recommend that you check their respective privacy policies which they should make available to you;
- created by us in the course of the recruitment process including during the course of the interviews which may be recorded and transcribed. You will always be informed in advance if we are going to record the interview.

#### **V. WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU**

During the recruitment process, we collect the following personal data:

- Personal data required by local laws: We collect personal data that is required under local laws, this includes: your name and surname, your contact details, your previous professional experience as well as your education.
- Personal data provided by you in your *curriculum vitae*, application form and other documents and information you provide us during the recruiting process, this may include: date of birth, age, gender, home address, personal email address, education, qualification and work experience details, references, training and diplomas, knowledge of foreign languages, driving license details, data contained in employment certificates.
- Information collected or created by us during the recruitment process including interview notes and correspondence between us.
- Information collected from third companies to which we have asked for references

#### **VI. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA AND WHICH IS THE LEGAL BASIS**

We process your personal data for the following purposes:

- To analyze your vacancy and information provided in this regard, progress the recruitment process, have interviews with the different stakeholders, assess and



make a decision about your suitability for a role, and to communicate with you; in this case the processing is necessary in order for us to handle the recruiting process. In some cases we may record the call. In such cases, you will always be informed in advance and, where required, we will obtain consent from you or give you a right to object;

- To carry out pre-employment checks according to the applicable legislation, and to undertake any steps that we need to take prior to engagement; in this case the processing is also necessary in order for us to handle the recruiting process;
- In case you were not selected for the position but your professional profile suits for other recruitment vacancies we may contact you during the first 2 years after the closure of the recruiting process in which you were not selected, we would do that based on our legitimate interest or another appropriate legal basis under local data protection laws; however, different retention periods may apply in certain countries please see the country-specific provisions at the end of this document.
- we may also need to process your data to comply with legal requirements;
- we may also process your data to ask for references to your previous employers or companies you have worked with, based on your consent;
- where it is necessary, for the establishment, exercise or defense of legal claims.

## **VII. CONFIDENTIALITY**

We protect your data with organizational and technical measures to keep it confidential and secure. If we share your data, we require our suppliers and companies of the group to respect strict confidentiality obligations.

## **VIII. WITH WHOM DO WE SHARE YOUR PERSONAL DATA**

During the recruitment process, we will need to share your personal information internally and with certain third parties.

We may share the data internally within our group companies. This means that our employees who are engaged in the recruitment process will have access to your personal data, however the access will be limited to the data strictly necessary to perform the recruitment process.

We may also share your personal data externally:



- With recruitment agencies or recruiting experts
- With your prior consent, with entities, companies or individuals you worked for in the past for validation and/or reference purposes;
- Recruiting and hosting tools (which may include the transcript, call recording and summaries to help streamline our assessments while ensuring a smooth and focused conversation).
- External advisors to do pre contractual checks
- other third party suppliers who provide services on our behalf.

Every time we share your data, internally or externally, we will take steps to protect your personal data in line with the applicable data protection requirements.

## **IX. USE OF AI-POWERED TOOLS**

We use AI-powered tools at various stages of the recruitment process to support our team in (i) providing structured guidance and assistance in conducting consistent and objective assessments; (ii) analysing interview interactions and generating structured feedback and summaries in assessing your suitability for a role (iii) transcribing and summarising conversations during interviews to keep accurate and structured records of the process; and (iv) monitoring and improving our recruitment processes and supporting the professional development of our recruitment team members.

When an AI tool provided to us by a third-party vendor is used, we always ensure that those are vetted and compliant with applicable data protection requirements.

We want to be clear that the AI tools do not decide whether to discard or hire a candidate. We have a human centric process and the final decision is made by our recruiting team. No decision about your candidacy is based solely on automated processing. The use of AI helps us have more consistent, objective, and fair candidate assessments.

The AI tools may process the following types of personal data: curriculum vitae (CV), application materials, interview notes and assessments, and any documents you provide during the recruitment process, and where consent has been given, video and audio recordings.



All recordings and transcripts are stored securely and only accessed by authorised recruitment team members. Also, bear in mind that, when an AI tool is provided to us by third-party vendors, those are carefully checked before we start using them.

Participation in AI-assisted interviews and transcription is not mandatory. If you prefer not to use AI tools during your interview, you may request a fully human interview without AI assistance. You may also choose not to have your interview transcribed.

#### **X. DO WE CARRY OUT INTERNATIONAL DATA TRANSFERS?**

Yes. Some of the companies with which we share data may be located out of the European Union or out of the country where the candidate is located.

When we transfer your data we always do it in accordance with data protection applicable regulations and requirements and we always use an international legal mechanism such as standard contractual clauses.

#### **XI. HOW LONG WILL WE KEEP YOUR PERSONAL DATA**

We will only retain your personal data for as long as permitted by applicable law or necessary to fulfill the purposes we collected it for. In all cases, we will retain your personal information for the duration of the recruitment process in connection to the position you applied for.

We will also hold some personal information about you as required for legal purposes and for the length of any applicable limitation period for claims which might be brought against us in the future.

If:

- your application is successful, your personal information will be retained for the duration of your employment or engagement with us. Upon hire, your personal information will also be transferred to our HR system and will from that point be governed by our Personal Data Privacy Policy.
- your application is not successful, we will retain your personal data for 2 years as follows:



- For compliance and legal purposes (such as evidencing that we have fulfilled our obligations during the recruitment process and for potential use in legal proceedings);
- For talent pool purposes based on our legitimate interest in identifying suitable candidates for future roles (such as contacting you in case your profile is suitable for a new vacancy). You can always object to this at any time by contacting us at [privacyrecruiting@docplanner.com](mailto:privacyrecruiting@docplanner.com).

Please note that specific retention periods may vary by country; refer to the country-specific provisions at the end of this policy for details applicable to your location.

## **XII. WHAT ARE YOUR RIGHTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA**

You have the following rights:

- right to be informed about the processing of your personal data (i.e., for what purposes, what type of personal data, to what recipients it is disclosed, storage periods, any third-party sources from it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences). Reading this Privacy Policy forms part of your right to be informed;
- right to lodge a complaint with us [privacyrecruiting@docplanner.com](mailto:privacyrecruiting@docplanner.com) or with your supervisory authority if you consider that we process your personal data unlawfully;
- right to request a copy of the personal data that we process about you;
- right to ask us to delete your personal data;
- right to ask us to rectify your personal data;
- where applicable, you can object to the processing of your personal data and/or withdraw your consent by sending an email to [privacyrecruiting@docplanner.com](mailto:privacyrecruiting@docplanner.com)
- you have the right to restrict the processing of your personal data;
- where applicable, you can ask for your data to be provided on a portable basis.

## **XIII. HOW AND WHERE TO CONTACT US**

If you have any questions or concerns regarding this Candidate Privacy Policy or our processing of your personal data, or you want to exercise any of your rights in accordance with the applicable regulations, please contact us by e-mail at

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[privacyrecruiting@docplanner.com](mailto:privacyrecruiting@docplanner.com) or by post mail at the address of the entity listed above that you are applying to work for or collaborate with.

#### **XIV. CHANGES TO THE CANDIDATE PRIVACY POLICY**

We may change and update this policy from time to time. Any changes we may make to our policy in the future will be posted on this page and, where necessary, notified to you by email.