

# Recruitment Privacy Notice

## Join our journey.

This Recruitment Privacy Notice (hereinafter referred to as “Privacy Notice” or “Notice”) explains how your Personal Information (herein “Personal Information” or “Information”) and Other Data (herein “Other Data”), are processed in our recruitment activity and how Archirodon retains such data in its Online Recruitment System (herein the “System”) and other Online Systems as necessary (i.e. career webpage, email software, cloud storage software etc., collectively herein the “Online Systems”).

Additionally, you may find information about your rights under applicable data privacy laws. This Notice also covers all other means except our System, both online and offline, by which Archirodon collects Personal Information (e.g., social media pages, interview assessments, online psychometric and technical testing assessments, telephone or in person discussions, internal and external communication, background checks etc.).

## Introduction

At Archirodon and our subsidiaries and affiliates (collectively “Archirodon”, “we”, “us” or “our”), we utmost value your privacy and we take our responsibility to protect, safeguard and secure your data related rights very seriously. We fully comply with all applicable legislation (including the EU 2016/679) for the protection of such data and we only process Information for specified, explicit and legitimate purposes as detailed in this Notice.

## Why Do We Need Your Personal Information?

Your Personal Information is processed via our System, through which Archirodon’s recruitment team administers the recruitment process, as well as via other Online Systems as necessary. Personal Information is stored and used for the purpose of evaluating your application and processing your hiring in the scope of Recruitment and Selection, as well as for other similar purposes.

All the Personal Information shared during the recruitment process will only be used for intended Recruitment and Selection purposes, with the objective to fill open vacancies in one of the companies of Archirodon, so as to serve our legitimate interests, carry on our business activity, meet our contractual obligations, or to fulfil legal or regulatory requirements where necessary.

We may also process Personal Information that form historical data for purposes of planning, monitoring and recording our recruitment activity on lawful basis of our legitimate interests as stated above. It also includes notifying you from time to time of new vacancies that may suit your qualifications and career aspirations.

## What kind of Personal Information Do We Collect?

Personal Information is considered all data or combination of data that could be used to identify a natural person. Such Personal Information that we collect may include: surname, name, middle name, place of work and position held, contact information (e.g. e-mail addresses, telephone numbers, work address,

home address), or preferred work location, date of birth, nationality, ethnicity, passport, previous employment information, which may include start and end dates, etc.)

In the initial stages of the application process, we do not seek to collect special categories of Personal Information from you (also known as “Sensitive Personal Information”). At the final stages of the selection process and in order to proceed with your hiring, we may require Sensitive Personal Information such as a criminal record for visa issuance, religion or health records for medical fit purposes, as required by local laws and regulations of the specific work location and the nature of the job opening and/or as long as we need to make reasonable adjustments to facilitate your employment. We may also process such special categories of Personal Information, such as ethnic origin, to monitor recruitment statistics. Any end product will refer only to larger aggregations of individuals and will not identify you personally or include any results attributable to you.

Archirodon is an equal opportunity employer. All applications are considered without regard to race/ethnicity, color, religion, gender, sexual orientation, age, gender identity or gender expression, national origin, disability or veteran status, or any other status which is protected by applicable laws.

### **Who Can Access your Personal Information?**

Archirodon will be the Controller (and in some cases the processor) and will determine the purposes and means of processing the Personal Information. Access to your Personal Information is limited by need. Only people involved in the recruitment process (e.g. Hiring Managers, members of the respective hiring department, recruitment & HR team members etc.) may have access to such Information.

If your professional profile is deemed suitable for another opening within Archirodon, your application data may also be exchanged with affiliates, and/or subsidiaries of any other jurisdiction worldwide where Archirodon may conduct business, which may have a different data protection regime than the country in which you reside.

All third parties can access your Personal Information as necessary to perform their functions solely for the intended legitimate purposes, as described within this Notice. In some cases, we use the services of various providers in order to meet contractual and/or statutory obligations. Archirodon will not disclose your Personal Information to unauthorised third parties. We will only disclose your Personal Information to other data processors and only if it is necessary for fulfilling our legitimate purposes, if we or the third party has a legitimate interest in this disclosure, or you have prior provided your consent.

However, this Privacy Notice does not address, and Archirodon is not responsible, for the privacy, Information or any other related practice received from any third parties, including any third party operating any website or service to which our System links. The inclusion of a link on our System by no means implies an endorsement of the linked site or service by Archirodon.

### **What About the Information of Third Parties that You Provide?**

If you provide any Information of a third party (e.g., referees), you are responsible for obtaining their consent and ensuring they are aware that their Personal Information will be forwarded to and used by Archirodon.

## Processing of Your Personal Information

Processing of Personal Information which is collected through the recruitment and selection process may involve the following procedures: collection, recording, systematization, accumulation, storage, modification (e.g., updating, revision), retrieval, use, deletion, destruction, blocking, transfer (e.g., dissemination, provision, access) of Personal Information as necessary under the circumstances or as otherwise required by law.

## Your Rights

Provided that the requirements of the law are met, you may request at any time to:

- access and obtain a copy of your data on request and/or to receive all your Personal Information in machine-readable format while having them completely deleted from our System and other Online Systems (in cases where there are no legal conflicts, please also see the section *“Consent”* below)
- change incorrect or incomplete Personal Information
- erase/delete or stop processing your Personal Information
- restrict/stop processing of your Personal information
- object to the processing of your Personal Information for the intended purposes as described in this Notice
- withdraw your Consent at any time

In the event of placing such a request Archirodon retains the right to request from you information that will confirm your identity, before the provision of the requested service to you and will inform you regarding the actions taken no later than thirty (30) days.

You may find specific information regarding the exercise of your rights within the *“Consent”* section of this Notice or by directly contacting us via the details as presented in the *“Contact Us”* section below.

## Your Candidate Profile

Our goal is to provide you with the best matching opportunities. You, as a candidate, have a responsibility to ensure that the Personal Information we hold about you is accurate, correct, true and up to date. This can be done via the "Candidate Profile" (herein also referred as "Profile") in the System's Candidate Portal, where you can amend your Personal Information, should you wish to do so, or by directly contacting the recruitment team to inform us of any relevant changes.

The Candidate Profile requires a valid e-mail address as a login, along with other Information, some of which is mandatory, as indicated accordingly. Your email address allows us to contact you, when your qualifications and career preferences match job opportunities, or if you opt to receive automated notifications of job openings at Archirodon.

Your Candidate Profile also makes it possible for you to access the System, monitor the progress of your application, delete your Profile at any time or revoke your Consent. You are welcome to further search information regarding this matter in the *“Consent”* section of this Notice.

## How Do We Collect Your Personal Information?

Personal Information might be contained in application or registration forms that we receive either directly through our Career Portal or from any third party to which we subscribe (e.g., online job boards, advertisements, LinkedIn or other social media), any Information being publicly available, or may be collected through interview assessments, reporting and profiling, psychometric and technical testing assessments or direct conversations you have with us, on the ground of the legal basis of processing.

From time to time, we may also receive Personal Information about you from colleagues and former employers, other candidates, or from professionals for whom you have provided services or been otherwise engaged. In any case, it is our obligation to inform you of the source we have obtained your Personal Information when we first get in touch.

In case any of your publicly available Personal Information enters into our System through any third party (e.g., LinkedIn), you will be invited via email to activate your Profile within thirty (30) days, otherwise your Profile collected from any of the above sources along with any collected Personal Information, will be permanently deleted. Please also refer to the *“Membership to Archirodon Candidate Communities”* section for further relevant information.

### 1. Application for a Specific Position

For transparency and data privacy reasons, only applications made through our Career Portal will be considered. So, the simplest and safest way to apply for a job at Archirodon is a direct application through our Career Portal which is linked to the job boards we partner with. Your application will be assessed as per our internal recruitment processes.

One exception are paper applications which are entered manually in the System and then either returned to you or destroyed. In any case, in the event that any Personal Information manually enters into our System for whatsoever reason, you will receive an email allowing you to activate your application and subsequent Profile once it has been manually entered in the System. If you do not activate your application within thirty (30) days, your data will be permanently deleted from our System and collectively from all other Online Systems, and you will be removed from the selection process.

You can monitor the status of your application via your Candidate Profile as well as withdraw your application at any time, if you are no longer interested in the current opening. If you withdraw your application, you will no longer be considered as an active candidate for that specific opening. Still, you be considered for other career opportunities that may suit your qualifications and career interests, unless you delete yourself your Profile from our System or you instruct us to do so.

### 2. Unsolicited or General Application

If you apply unsolicited in our System, you agree to be contacted for any current and future job opportunities, matching your qualifications and career preferences.

The provided Information and documents will then be used worldwide within Archirodon and our recruitment team may contact you, should a career opportunity arise, matching your professional profile. In such cases, our recruitment teams may forward your data to the responsible Hiring Managers or any

other Archirodon associate. If, at a specific time, you no longer wish to be contacted, you can delete or withdraw your unsolicited application, so that you will not be found in our candidate pool.

### 3. Other Sources

You also have the option to make use of your referral network and submit your application for a specific opening via an Archirodon employee, whom we can identify that has recommended you. You can simply send your CV to the Archirodon employee, who will then upload it to the System. The employee can see an overview of the status of your application but cannot see any details of your application process. You will then receive an email allowing you to activate your Profile in our System. If you do not activate your Profile within thirty (30) days, your Information will then be permanently deleted from our System and other relevant Online Systems and you will be removed for our candidate pool, so that your Profile will no longer be available for any recruitment purpose.

In case you wish to use your referral network within Archirodon for an unsolicited application, our Archirodon employee or any other Archirodon external associate, will notify our recruitment team, who in turn will contact you to provide you with guidelines on how to access our System and apply yourself. Your referee name will be manually associated with your Profile. This process will also be followed when you wish to apply for a specific opening via an Archirodon external associate.

#### Do We collect Other Data?

Archirodon and third parties may collect Other Data that does not reveal your specific identity in a variety of ways, including:

- **using Cookies**

Please see our Cookie policy in our [Privacy Protection Statement](#) which describes the types of cookies we use and why.

- **physical location**

We may collect the physical location of your device by, for example, using satellite, cellphone tower, Wi-Fi signals etc.

- **by the aggregation and de-identification of information**

Aggregated and de-identified data are not personal identifiers. Please see the “*Consent*” section of this Notice for further information in respect to this matter.

#### Membership in Archirodon Candidate Community

If you are invited to join one of our Archirodon candidate communities in our System, your Personal Information will be retained in our candidate pool and will be available to all recruitment and HR teams of Archirodon, so we can proactively contact you should any further suitable openings arise. You are free to accept or reject the invitation to our candidate community that you will receive via email.

However, if you accept to become a member, it enables us to inform you about the future vacancies, build an ongoing relationship with you and make your Personal Information available for these openings. You may delete/withdraw your Profile in Archirodon candidate community at any time, so that your Profile is no longer searchable for potential openings.

## Your Consent

You will be prompted to take positive and affirmative action in giving us your Consent for Processing Personal Information – we will provide you with a tick box for you to check or Accept/Reject option to select from, so that this requirement is met in a clear and explicit fashion. By providing your Consent, you agree that all legal entities of Archirodon may contact you for Recruitment and Selection purposes as per our legitimate interests and that your application Information may be used to consider you for other opportunities at Archirodon, other than the one(s) you applied for.

The provision of your Consent is optional at any time. However, please be aware that your refusal to provide us your Consent for processing your Personal Information, may result in, Archirodon not being able to carry out any activity related to your recruitment, and hence being unable to consider your employment application.

You may opt-out from your Consent for Processing of Personal Information at any time by sending a written notice to Archirodon's Data Protection Officer (DPO), whose contact information is listed below. You can also revoke your Consent for the use of your Personal Information yourself by deleting your Candidate Profile and all relevant Personal Information from our System. Doing so, all applications associated with that Profile and all Information contained in it and in all applications will be permanently deleted. We will be then respectively notified via the System and we will manually proceed to delete your personal Information from other Online Systems, where applicable and subject to any legal, contractual and/or operational limitations in force at the time, whilst you will be informed for the actions taken within thirty (30) days after the written notice is received and the requestor's identity is confirmed by Archirodon.

You are also free to edit or withdraw your application at any time during the application process. To do so, you can either access your Profile within the System or you can inform our recruitment team member that you work with to do it for you.

If your Personal Information is deleted, your data may be anonymized in a way that can no longer identify you and used only for statistical or reporting purposes. Such aggregated or de-identified data ("Other Data") may be treated lawfully for any purpose as long as it is a non-identifier of your personal identity. For example, we may aggregate Information to gain analytics, for example data concerning the regional distribution of our candidate pool, our reporting statistics etc.

## How Long Do We Retain Your Personal Information?

We retain your Personal Information in the System and other Online Systems as necessary, for a period of time that enables Archirodon to pursue the above-mentioned purposes, to serve our legitimate interest in its retention and comply with applicable laws and legal purposes.

Your information will remain on file with us as long as you are actively pursuing career opportunities with Archirodon. However, if your specific application is unsuccessful or withdrawn at any stage of the process, the Information you have provided and generated throughout the recruitment process (e.g., interview notes) until that point, will be retained for five (5) years from the above-mentioned events. In the same events of a rejected or withdrawal of your unsolicited application on any occasion, your Profile is deleted after five (5) years and is no longer searchable for matching future openings.

At that point, we may contact you to inform you that your Information will be removed from the System unless you instruct us otherwise.

If your application is neither deleted or withdrawn, nor do you delete your Candidate Profile yourself, your Personal Information will be stored until further action is taken on your side or as long as you are actively pursuing career opportunities with Archirodon. No automatic deletion will take place. Nevertheless, we advise you to retain a copy of the Personal Information provided to us, since we may delete data about you from our System at any time and without providing any reason or warning.

We may retain Information for longer than the below-mentioned period, based on the following criteria which we use to determine our retention periods: i. the duration of the recruitment cycle; ii. where we have a legal or contractual obligation which apply for a long period, for example for the period during which claims may be against us iii. as long as we have an ongoing candidate relationship with you iv. where we form the view that there is an otherwise continued basis on business related interest/need to do so, for example where your Personal Information identifies specialist skillsets which may remain in demand for long periods or form historical or reporting Information of past recruitment activity; v. The long cyclical and technical expert nature of Archirodon's business activity, which may require on-going demand of market industry's specialists. Whatsoever, your Personal Information will not be used for any other purposes and their processing will fully comply with this Privacy Notice.

### **Transfer of Personal Information Upon Hiring**

If your application is successful and you proceed to hiring, the Personal Information you have provided during the recruitment process, will be transferred to the HR Information system in accordance with Archirodon's Privacy Notice for employees. You will also be prompted to provide a new consent for the processing and storage of your Information to this end, upon receiving your offer of employment and upon your hiring.

### **Storage & Security**

We take all reasonable and fair information measures to ensure that your Personal Information will not be lost accidentally or unlawfully destroyed, misused or disclosed, and will not be accessed except by our authorized staff in the proper performance of their duties. We process Personal Information lawfully, fairly and in a transparent manner in relation to you.

Personal Information may be stored in a range of different places, including your application record, our System and other Online Systems. Archirodon has implemented acceptable standards of technical measures and security policies that protect your Information and keep a record of where your Personal Information is stored in its systems.

### **Contact Us**

If you have questions or requests about the process or how we handle your Information or if you simply want to exercise your rights, please feel free to reach our associate appointed for such matters using the following contact details:

Data Protection Officer

**Email:** [DPO@archirodon.net](mailto:DPO@archirodon.net)

**Address:** 3, Aghiou Andreou, Aghia Paraskevi, 15343  
Athens, Greece

### **Revisions of this Privacy Notice**

We reserve the right to regularly review this Privacy Notice at any time in order to address future changes in our business, internal processes, the System or in applicable laws.

We will publish the updated Privacy Notice on the System and we will announce the respective changes on our Career Portal which is linked to the System. Any changes will come into effect upon the posting of the revised Privacy Notice on our Career Portal. You can determine when this Privacy Notice was revised by referring to the “Last Updated” sign at the bottom.

**Last Updated:** 25/07/2019