

CANDIDATE'S PRIVACY NOTICE

1. Introduction

The protection of your personal data is very important for Archirodon Group of Companies (hereinafter "Company" or "Data Controller"). The transparency of the processing of personal data is one of the fundamental principles of the General Data Protection Regulation (GDPR), which is applicable for the processing of personal data for recruiting purposes, according to the applicable legislation on personal data protection. The processing includes indicatively the collection, storing, usage, modification, deletion of personal data.

Archirodon Group of Companies (hereinafter "the Data Controller" or "the Company"), is the Data Controller for the processing your personal data, pursuant to EU General Data Protection Regulation 679/2016 (hereinafter "GDPR") and L. 4624/2019. This privacy notice is provided in order to inform you on the personal data collected, to explain the way and purpose of data processing, to state any third parties with whom we share your data and finally to inform you on your rights.

2. Contact details

For issues related to the processing of personal data for recruiting purposes, please contact the Data Protection Officer of the Company at DPO@archirodon.net.

3. How do we collect your personal data?

The Company processes personal data in order to fulfil the recruitment process.

The personal data are provided by you or the person who submits your job application (referrer) and you have the responsibility to inform the Company for any change or modification.

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 data will be forwarded to and used by the Company.

4. Personal data we process

Within the context of the evaluation of your application, the Company collects and further processes your personal data, such as:

- Identification information, indicatively: first name, last name, place of residence,
- Contact details, indicatively: e-mail address, phone number,
- Information regarding your education, professional experience and any certifications or other professional qualifications you have,
- Other information about you, as it may arise from your curriculum vitae or/and any letters of recommendation and/or letters of interest,
- Criminal records (provided that their collection constitutes a legal obligation),
- Evaluation of your suitability for working with the Company in relation to the subject-matter and the job post to which your application corresponds,
- Information about you that may arise from a background check carried out by the Company, deriving, directly or indirectly, from public domain data such as family circumstances information

(e.g. your marital status and dependents) if you are a Politically Exposed Person (“PEP”) or a close associate of a PEP, professional and personal affiliations (e.g. organisations, including sanctioned vessels and aircraft, and individuals that you may be associated with in your professional or personal capacity), your inclusion (if any) on sanctions lists or on public lists of disqualified directors or other positions of responsibility, public domain data about actual or alleged money laundering or terrorist financing crime, or crimes that are a pre-cursor to money laundering or terrorist financing which are also known as predicate offences (e.g. illegal trafficking, environmental offences, smuggling, membership of an organised crime group), your postings on website, blogs or social media applications,

- Information regarding any reasons for rejecting your application.
- In case you refer another person and submit his job application, the Company collects and further processes also your personal data, such as:
 - Identification information, indicatively: first name, last name,
 - Contact details, indicatively: email address.

5. Purposes and Legal Bases for the Processing of personal data

The processing is lawful to the extent that is necessary:

- For the performance of a contract:

In view of the potential conclusion of an employment contract with you, the Company collects and further processes the aforementioned personal data, which are absolutely necessary for the purpose of recording and evaluating your application. It is our priority to carefully select the people who are going to work with us, on merit-based criteria and to ensure that they have all the appropriate educational and professional qualifications.

In order to evaluate your application, we process your personal data, as contained in electronic application forms, CVs, letters of interest, letters of recommendation that you send to us, or as generated from any in-person interview with us or any technical assessment relating to the subject-matter of the job post or as revealed by any background check on your profile.

In case we need to process your personal data for any purpose other than the above, we will inform you appropriately and in advance and ask for your consent, if required.

- For the purposes of the legitimate interests pursued by the Company:

It is in the Company’s legitimate interests to process your personal data when you refer another person and submit his job application, in order to safeguard the trustworthiness of the recruitment process.

It is also in the Company’s legitimate interests to process your personal data in the context of the performance of due diligence and other screening activities in accordance with its legal or regulatory obligations and risk and compliance management policies and procedures, including but not limited to the purposes of anti-money-laundering, anti-bribery or anti-corruption or other regulatory compliance checks, or for preventing financial crime, fraud or other criminal or unlawful activity (for example, modern slavery, illegal trafficking, environmental crime, etc.) and any unethical conduct.

6. With whom do we share them?

Your personal data are collected and further processed by the responsible and authorized Company's personnel. However, the aforementioned personal data may be disclosed to recipients outside Archirodon Group of Companies, such as:

- The Company's website operator,
- Online forms providers, and any other third parties with which we collaborate for the fulfillment of the aforementioned purposes,
- Judicial, administrative and regulatory authorities, in the context of their competences and upon their relevant request, order, decision or judgment, or based on specific requirements under the applicable law.

The Company has implemented all necessary measures, in order for the personnel and its partners to be specifically authorized for these purposes and fully committed to confidentiality and legal obligations under the legislation for the collection and further processing of the aforementioned personal data.

Where transfers outside the European Union/European Economic Area take place, the Company implements appropriate data processing agreements or terms with the recipients to ensure that the transfers of personal data are in compliance with GDPR requirements and are based on relevant adequacy decisions by the European Commission or are subject to appropriate safeguards.

7. Retention and Security of personal data

The data provided with your expression of interest, collected for the purpose of evaluating your application for any current and/or future position, as well as the respective results of the evaluation, are kept by us for as long as required to fulfill this purpose and in any case, for five (5) years following the end of the calendar year of the collection thereof, unless you inform us in the meantime that you wish to delete them.

In case the Company wishes to keep them for a longer period of time, we will ask for your consent.

The Company implements appropriate technical and organisational measures to ensure that candidates' personal data are processed in a manner that guarantees appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures include in particular the implementation of appropriate data protection policies, inter alia for taking information security measures and other measures to ensure the confidentiality, integrity, availability, durability and technical reliability of technological and information systems, and for managing and timely notifying personal data breaches, the pseudonymisation and encryption of personal data, where appropriate or feasible, and the adoption of binding confidentiality clauses by business partners who process personal data on behalf of the Company.

8. Your Rights

In any case we would like to inform you that according to applicable legislation, you may exercise the following rights, after verification of your identity:

- to obtain from the Company confirmation as to whether personal data concerning you are being processed, and, where that is the case, to receive a copy of the personal data and related information (right of access),

- to obtain the rectification of inaccurate personal data concerning you, or have incomplete personal data completed (right to rectification),
- to obtain the erasure of personal data concerning you, where the data are no longer necessary in relation to the purposes for which they were collected, or where there is no legal ground for the processing, among others (right to erasure),
- to obtain restriction of processing, according to law provisions,
- to receive your personal data in a structured, commonly used and machine-readable format, and to have the personal data transmitted directly to other persons or legal entities (right to data portability),
- to object, on grounds relating to your particular situation, at any time to processing of personal data concerning him or her, under certain conditions (right to object).

You can exercise any of the above-mentioned rights by submitting a written request to our Company. You can expect a reply to such a request within one (1) month following its receipt by the Company and in any case within two (2) months depending on the perplexity of your request or the high volume of requests received.

Furthermore, our Company is responsible for informing you, without undue delay, for any breach concerning your personal data, which may put in danger your rights and freedoms and under the condition that it doesn't fall under the exceptions provided in the law.

9. Right to Lodge a Complaint

In case you deem that we have not duly satisfied your request and the protection of your personal data is somehow affected, you may lodge a complaint through the dedicated online portal of the Office of the Commissioner for Personal Data Protection (Postal address: P.O.Box 23378, 1682 Nicosia, Cyprus | Tel: +357 22818456 | Fax: +357 22304565 | Email: commissionerdataprotection.gov.cy). You may find detailed guidelines on how to lodge a complaint on the Commissioner's website (https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home_el/home_el?opendocument).