

JOB APPLICANT PRIVACY NOTICE

INTRODUCTION

The purpose of the Notice is to explain to you as job applicants how Photos Photiades Group (the “Company” “we”, “us” “Group”) processes your personal data. We do take your privacy very seriously and it is our priority to safeguard your rights under the data protection law in every possible way.

CONTACT DETAILS

Photos Photiades Group is the data controller of your personal data. This means that we determine the purposes (why) and the means (how) of processing your personal data.

If you have any questions or concerns about this Notice, please do not hesitate to contact us via email at dpo@photiadesgroup.com or by post at the address shown below. Our Data Protection Officer will get back to you as soon as possible to help with your enquiry.

PO BOX 12586
2251 Latsia
Cyprus

SHARING YOUR DATA AND TRANSFERS TO THIRD COUNTRIES

We inform you that, during the assessment of your application, your personal data will be processed only by authorised personnel of the Group, namely the Human Resources Department and any other member of the staff responsible for assessing or administering your application.

At this stage of the recruitment procedure, we may only share part of your personal data namely data necessary to assess your entitlement to work in Cyprus namely we may share part of your personal data with the Civil Registry and Migration Department (CRMD) or other relevant bodies as this may be required by applicable law. We will not transfer any of your personal data to a third country.

YOUR RIGHTS

You have the right to:

- access your personal data (right to access)
- request the correction of inaccurate / completion of incomplete personal data (right to rectification)
- withdraw your consent.
- request the deletion of your personal data stored on your person (right to erasure).
- object to the processing of your personal data (right to object).
- to lodge a complaint to the Supervisory Authority. (Data Protection Commissioner – commissioner@dataprotection.gov.cy)

- to request restriction of the processing of your personal data (right to restriction)
- to request the transfer of your personal data to you or to another data controller (right to portability).

* Please note that these are by no means absolute as they are subject to various exceptions by law. The legal basis we rely on will determine which rights you are entitled to exercise. For example, when your personal data are processed by us on the legal basis of legitimate interest, the right to portability is not applicable; or, when processing your personal data as required by legislation, your right to erasure will not apply

To exercise your rights please use the contact details mentioned above.

We will need 1 month to respond to any of your requests, or 3 months when the request is excessive and/or requires more detailed investigation from our part.

PURPOSE AND LEGAL BASES

We are committed to protecting and processing your personal data only in accordance with EU (GDPR) and Cyprus (L.125(I)2018) data protection legislation. We will therefore process your personal data by following all fundamental principles of data protection law: lawfulness, fairness, transparency; purpose limitation; data minimisation, storage limitation; accuracy; confidentiality, integrity and availability.

We normally require the following categories of personal data from you in order to assess your job application:

- Identification data / contact details, such as: Full name, home address, email address, phone number, date of birth, ID, Passport, gender.
- Academic/educational data, such as: educational achievements, diplomas, transcripts, skills, languages.
- Employment data, such as: work permit, work experience and employment history, professional memberships, previous employer feedback / references.
- Other data, such as: hobbies and various assessments (possible in case you are shortlisted)
- Special categories of data: such a health condition, disability, ethnic origin.
- Previous criminal convictions / offences.

The legal bases on which we may rely on in order to process your data, are:

- You have given your clear and unambiguous consent for a specific processing activity (consent)
- We have a legal obligation to process the data (legal obligation)
- The processing is necessary for us to pursue our legitimate interests, provided that your fundamental rights and freedoms do not override those interests (legitimate interest)
- The processing is necessary in order to take steps at your request prior to entering into an employment contract with you. (contract)

The following table will help you better understand the purposes, legal bases, the categories of personal data we process and the sources from which the personal data originate.

CATEGORIES OF DATA	PURPOSE	LEGAL BASIS	SOURCE
- Identification/ contact data	- To confirm your identity, - To contact you during the assessment of your application, e.g. to allow us to invite you to an interview or otherwise contact you for other reasons regarding your application)	- Legitimate Interest	- Yourself as the data subject, through the application form, CV or LinkedIn.
- Identification/ contact data - Academic/educational data - Personal life data	- To confirm that you fulfill the criteria for a specific job position. - To confirm you are entitled to work in Cyprus.	- Legitimate Interest - Legal obligation	- Yourself as the data subject, through the application form, CV or LinkedIn. - Your previous employer (s) - Your named referees.
- Special categories of data	- We may ask you to provide us with this information in order to help us <ul style="list-style-type: none"> ○ when it is necessary to make reasonable adjustments, ○ when it is necessary to determine whether you are able to perform a specific task, or ○ where the duties associated with the position require us to conduct specific health or medical checks. We will not request to collect any relevant health certificates unless the company makes you an offer for a specific position.	- Legitimate Interest - Carrying out the obligations of the data subject in the field of employment and social security and social protection law.	- Yourself as the data subject,
- Criminal convictions / offences	- This limited only to cases where it is strictly necessary for purposes linked to the responsibilities and duties of the employment relationship or where it is required by law. We will not request to collect a certificate of clean criminal record unless the company makes you an offer for a specific position.	- Legitimate interest - Legal obligation	- Yourself

DATA RETENTION

The personal data of applicants whose application was not successful will be retained by the Group for approximately 12 months from the date of their application, in order to examine these specific applicants when assessing future job opportunities for which they may be suitable.

Therefore, if your application is not successful and you do not give your consent as below, your personal data will be retained for 12 months for the sole purpose of contacting you for any relevant future vacancies that may become available during those 12 months, unless there is a legal obligation requiring us to retain the data for a longer period.

If during the assessment of your application you have any concerns which may stop the procedure, please inform accordingly the HR department. In this case, the processing of your personal data will stop, we will not be able to further assess your job application stop, and the data will immediately be deleted.

SECURITY

We take a risk-based approach, which is laid on the principle of implementing those technical and organisational measures necessary to address the risks to the data you provide to us.

In this respect, we aim to provide a set of security principles to follow, so that we ensure the appropriate confidentiality, integrity and availability of the personal data we process within the context of this job application process.