



**Euro
Finance**
Member of Eurohold



Privacy policy for recruitment

POLICY ON THE PRIVACY OF PERSONAL DATA PROCESSED BY EURO-FINANCE AD AS A PERSONAL DATA CONTROLLER IN THE RECRUITMENT PROCESS

This privacy policy is intended to provide clarity to applicants for employment with EURO-FINANCE AD (the Company), regarding the following circumstances:

- On what basis of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation/ GDPR) this data is processed.
- For what purposes this personal data is processed.
- For how long this data is kept.
- Whose personal data the Company processes in connection with the recruitment process.
- What personal data is processed in connection with the recruitment process.
- Who has access to that data.
- What rights data subjects have and how they can exercise them.

The controller of the personal data provided on the recruitment of employees is EURO-FINANCE AD, registered in the Commercial Register at the Registry Agency with UIC: 831136740, with address of its seat and head office in Sofia, Iskar res. area, 43 Hristofor Kolumb Blvd., tel: (+359 2) 980 56 57, fax: (+359 2) 981 14 96, email address: office@eurofinance.bg, for the purposes of protection of personal data: dpo@eurofinance.bg, website: www.eurofinance.bg. The Personal Data Protection Officer of EURO-FINANCE AD is Natalia Ivanova Popova - Tsepenisheva with contact details as follows: Sofia, 1592, Iskar res. area, 43 Hristofor Kolumb Blvd., fl. 5, email address: dpo@eurofinance.bg, tel: (+359 2) 980 56 57.

GROUNDINGS FOR PROCESSING

The basis for processing of personal data in employee recruitment by EURO-FINANCE AD is to take steps at the request of the data subject before concluding a contract pursuant to Art. 6 para 1, let. (b) of the GDPR. The provision of personal data is voluntary and a necessary condition for participation in the selection procedure.

If, during the selection process, the candidate for the position, through deliberate consent, gives permission for his/her data to be stored and used for the purpose of future selection for other positions, for a period longer than 6 (six) months but not longer than 1 (one) year, then the basis for processing the data is consent - Art. 6, para 1, let. (b) of the GDPR.

Consent shall be provided in an appropriate and accessible manner and may be withdrawn by the data subject at any time and as easily as it was provided. Consent shall be given and withdrawn by the same action.

PURPOSES OF PROCESSING

EURO-FINANCE AD processes your personal data for the following purposes:

- To carry out recruitment for a specific announced vacancy, with the ultimate aim of concluding an employment contract with the selected candidate.

- To carry out future recruitment, if the subject has given his/her explicit consent to the processing of his/her data for this purpose and for a period of more than 6 (six) months, but no longer than 1 (one) year.

TIME LIMIT OF DATA STORAGE

The personal data contained in the CVs shall be kept for a period of 6 (six) months after the recruitment process has been completed and an employment contract has been signed with the selected candidate. The period of storage of CVs for the purpose of future recruitment, for those who have given their explicit consent, shall be 1 (one) year from the date of consent.

TYPES OF PERSONAL DATA AND CATEGORIES OF DATA SUBJECTS

The Company processes personal data of persons who participate in a recruitment procedure, namely the data contained in the CVs of the subjects provided by them. Such categories of data may be:

- Identification data/physical identity
- Social identity data (education and professional experience)
- Family identity
- Other data indicated in the announcement launching the selection procedure, where such data are required by law for the announced vacancy.

ACCESS TO DATA

Only certain employees of the Company involved in the selection process have access to the applicants' data. These are the Human Resources expert, the immediate head of the structural unit for which the selection is being made, the members of the company's management body in connection with the performance of their assigned management functions. The above-mentioned persons are bound by confidentiality clauses in relation to the processing of personal data in the course of and in connection with the performance of their duties.

Candidates' data are accessible from the website through which the person applied for the job and on which the vacancy notice was published (in particular <https://www.jobs.bg/>).

The Company shall take and implement all necessary technical and organisational measures to protect the personal data of the subjects and ensure respect for their rights.

The Company shall guarantee that the personal data received will be processed fairly and impartially with regard to the interests of the subject and their fundamental rights and freedoms.

WHAT RIGHTS DO DATA SUBJECTS INVOLVED IN THE RECRUITMENT PROCESS HAVE AND HOW CAN THEY EXERCISE THEM?

The data subject has the right to:

- On request, obtain all necessary information relating to the processing of the data he or she has provided.
- To request from the Company the rectification or erasure of personal data or the restriction of the processing of personal data if the prerequisites for this are present.

- To object to the processing and to lodge a complaint with the Commission for Personal Data Protection (CPDP) and with the competent court in case of unlawful processing of the data.
- To withdraw his/her consent to the processing of his personal data at any time where the data was provided on the basis of consent.
- To be informed of the consequences of not providing consent to the processing of his/her personal data.
- To be informed of the purposes and duration of the processing of his/her personal data, and whether the Company intends to process the data for a purpose other than that for which it was collected, as well as in the event of a change of the purposes of processing.
- To be informed of changes in the controller's identification data. The information is provided via the official website of the Company.
- To receive a copy of his personal data collected.

All requests for the provision of the information shall be made in one of the following ways:

1. In person, on paper - in the office at the seat of the Company at: Sofia, 43 Hristofor Kolumb Blvd.
2. By letter addressed to: Sofia, 1407, 43 Hristofor Kolumb Blvd. - to Natalia Popova - Data Protection Officer.
3. Electronically to the following email address of EURO-FINANCE AD: dpo@eurofinance.bg. In this case, your request should be signed with a qualified electronic signature. A template of the request for the exercise of rights is available on the website of EURO-FINANCE AD for your convenience.

If a request is submitted, the Company reserves the right to request additional information to identify the person submitting the request or other information necessary to process the request, and the response period will begin after it is provided.

The request to exercise the rights of the data subject should contain the following information:

- Identification of the person - name.
- Contact details for feedback - address, telephone, e-mail address.
- Request - description of the request.
- Other information you consider relevant to the request.
- Date and signature (handwritten).

The company shall respond to the subjects' requests in a reasoned manner, complying with them if there are grounds for doing so, or issuing a reasoned refusal if there are grounds for doing so, indicating also the subjects' right to object to the CPDP and to the competent court.

SUPPLEMENTARY PROVISIONS

Definitions

1. "Personal data" means any information relating to an identified natural person or a natural person who can be identified by name, identification number, location data, online identifiers or by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
2. "Processing of personal data" means any operation or set of operations which is performed upon personal data or a set of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

3. "Consent of the natural person" means any freely given, specific, informed and unambiguous indication of the data subject's wishes, by means of a statement or a clear affirmative action, which signifies his or her agreement to personal data relating to him or her being processed.
4. "Data subjects" are the natural persons who hold the personal data. In this case, the personal data subjects are the job applicants.
5. "Right of access" - the data subject has the right to obtain confirmation from the controller as to whether personal data relating to him or her are being processed and, if so, to obtain access to the data.
6. "Right to rectification"- the data subject has the right to request the controller to rectify inaccurate personal data concerning him or her.
7. "Right to erasure" - the data subject shall have the right to request the controller to erase personal data relating to him or her and the controller shall have the obligation to erase the personal data where the personal data are no longer required for the purposes for which they were collected or processed, or the data subject withdraws his or her consent on which the processing of the data is based, or the personal data have been unlawfully processed.
8. "Right to restriction of processing" - the data subject has the right to require the controller to restrict processing where the accuracy of the personal data is contested by the data subject, for a period which permits the controller to verify the accuracy of the personal data, or the processing is unlawful but the data subject does not wish the personal data to be erased but requests instead that their use be restricted.

For cases not covered by this Policy, the Privacy Policy of EURO-FINANCE AD shall apply, as well as the provisions of the applicable law.

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