

JOB APPLICANTS' PRIVACY POLICY

1. COMPANY DETAILS

The company under the name “**MARGARITA KONTZIA MONOPROSOPI IDIOTIKI KEFALAIOUCHIKI ETAIREIA**” having its registered office in Athens, Tompazi Street no. 10, with Tax Identification Number 801194883 and with a GEMI number 151486701000, as legally represented [hereinafter "the Company" or "we"] constitutes the **Data Controller** of your personal data as our prospective employees, in accordance with no. 679/2016 General Data Protection Regulation (GDPR) or simply "**GDPR**") and the no. 4624/2019 national law on the protection of personal data, as in force from time to time (hereinafter collectively “**applicable law**”).

2. SCOPE

This Job Applicants' Privacy Policy (hereinafter "**the present**" or simply "**Policy**") informs you about the way we process any kind of information that can directly or indirectly identify you, i.e. any personal data you provide to us as a candidate employee when you submit a job application to us, either unsolicited or in response to one of our job postings for a vacant position.

In particular, we inform you about the way in which we process the personal data you provide to us, either directly or through authorized third parties (e.g. employment agencies) throughout the recruitment process, i.e. from the submission of your job application to the stage of its possible approval or rejection by our Company.

If your application is accepted, our Company will inform you of how it processes the personal data of its employees as an employer through a specific policy it maintains for this purpose.

Please note that we do not use automated decision-making without human intervention (including profiling).

3. CATEGORIES OF PERSONAL DATA

The provision of personal data by you to our Company is optional. In the event that you do not provide or provide your personal data incompletely, we may not be able to evaluate your application.

A. Submission of Job Application

When you submit your job application in any way (e.g. by email), we generally collect and process the following categories of personal data about you, which you provide to us:

- Identification details, i.e., first name, last name.
- Contact details & Communication details, i.e., e-mail, phone number.
- Curriculum Vitae (CV/Resume), i.e., education, working experience, skills details, such as language skills, qualifications, talents, professional memberships, any other information you provide in your CV/resume or the cover letter.

B. Application Assessment

If we invite you to an interview to further evaluate your application and the information you provided with it, we generally collect and process the following categories of personal data that you provide to us:

- Information you provide to us during the job interview, i.e., your answers to certain questions relevant to the job role, Eligibility to work in Greece, eligibility to job position, reasons for your application.
- Information generated by us during the job interview, i.e., interview notes.

C. Conditional Offer

If we send you a conditional offer of employment and you accept it, we may ask you for additional information so that we can conduct certain necessary checks before hiring you. In particular, we have to verify, prior to hiring, the identity of our staff as well as their competence, reliability, and integrity. At this stage, we typically process the following categories of personal data that you provide to us:

- Identification details, i.e., proof of your identity, father's name and mother's name, ID number, gender, date and place of birth, nationality and a passport-style photo.
- Contact details, i.e., postal and e-mail address, telephone number (landline, mobile).
- Curriculum Vitae (Resume), i.e., proof of education degrees and diplomas, such as foreign language degrees and certificates, certificates of professional training seminars (if any), as well as any letters of recommendation that you provide to us yourself or consent to our obtaining.
- Personal & Family Status Details, i.e., stamps certificate of IKA or AMA, Tax Identification Number, Social Insurance Identification Number (AMKA), marital status, dependent members.

As mentioned above, if you accept the job offer and are hired by our Company, we will inform you about how our Company processes the personal data of its employees as an employer through a specific employee information policy.

4. PURPOSE AND LEGAL BASIS OF PROCESSING

Our Company collects and processes your personal data to the extent permitted or required by applicable law, in order to:

- contact you and evaluate your application, in particular whether it meets the conditions for recruitment of the available job,
- to suggest future employment opportunities to you, in the event that your initial job application is rejected, provided that you have requested and given us your consent to receive such information.

The legal basis for the processing of your personal data is paragraph 1 (b) of Article 6 of the GDPR, according to which the processing of your personal data is necessary in order to take steps at your

job request prior to entering into a contract with our Company. We rely for your personal data processing on your given consent, in accordance with par. 1 (a) of art. 6 of GDPR, in case that your job application has been rejected and you have asked us to be informed for future job opportunities.

5. Data transfer – Recipients

Our Company may appoint external/third-party service providers, who will provide any support services to the Company, such as internet service providers, or providers of technical and operational support services of the Website or recruitment processes. In order to provide our Company with these support services, it may be necessary for third party providers to process your personal data. In this case, they will act in accordance with the GDPR as "Processors" and must process your personal data securely, act under our instructions in the context of the contractual relationship between us and comply with the applicable legislation on the protection of your personal data. Our Company ensures that these providers are contractually committed to the protection of your personal data and to compliance with the applicable legislation. We may also transfer your personal data to judicial and/or prosecuting authorities, independent authorities, government authorities, if required under applicable law. We do not share your personal data with third parties for the purpose of promoting products or services.

6. INTERNATIONAL DATA TRANSFERS OUTSIDE THE EU/EEA

As a general rule, we do not transfer your personal data outside the European Union/European Economic Area (hereinafter simply "EU/EEA"). To the extent that, in the context of and for the needs of the above-mentioned purposes, your personal data need to be transferred outside EU, such data transfer will take place in accordance with applicable law, and our Company will ensure an adequate level of data protection. By way of entering into appropriate data transfer agreements based on Standard Contractual Clauses which are accessible to you at your request at **info@alkimathens.com** or by taking other measures to provide an adequate level of data protection, our Company ensures that the recipients are adequately committed to the protection of your personal data.

7. SECURITY OF PERSONAL DATA

Taking into account the latest developments, the costs of implementation and the nature, scope, context and purposes of the processing, as well as the possible risks of different origin and severity to the rights and freedoms of prospective employees, the Company implements appropriate technical and organizational measures in order to ensure the appropriate level of security, integrity and confidentiality of the personal data of prospective employees, in accordance with the applicable legislation.

8. RETENTION PERIOD

Your personal data will be retained for as long as it takes to fulfill the purposes for which they may be collected. Once the purpose of processing your personal data has been fulfilled, we will either delete the personal data or anonymize your personal data, unless there are legitimate reasons for retaining it. The Company may retain anonymous statistical data for the purpose of improving recruitment processes.

In particular, the personal data of prospective employees whose job application is rejected are securely deleted within one month after the fulfillment of the recruitment procedure. If your application is rejected and you ask our Company to retain your personal data in order to inform you about future cooperation opportunities, your personal data will be retained for the period of twelve months or until you withdraw your consent.

9. YOUR RIGHTS

You may exercise, as the case may be, the rights deriving from the applicable Greek Legislation and the GDPR which are as follows:

- **the right of access (Article 15 of the GDPR):** You have the right to obtain confirmation from us as to whether or not personal data concerning you is being processed, and, where that is the case, to request access to the personal data.
- **the right to rectification (Art. 16 GDPR):** You have the right to obtain from us the rectification of inaccurate personal data concerning you.
- **the right to erasure (Art. 17 GDPR):** Under certain circumstances, e.g., personal data are no longer necessary, you withdraw consent, you have the right to ask us to erase your personal data.
- **the right to restriction of processing (Article 18 of the GDPR):** You may have the right to request the restriction of processing your personal data.
- **the right to data portability (Article 20 of the GDPR):** You have the right to receive the data concerning you in a structured, commonly used and machine-readable format, as well as the right to transmit those data to another entity (controller), indicated by you to our Company.
- **the right to object (Art. 21 GDPR):** You have the right to object to processing your personal data from our Company on grounds relating to your particular situation, unless there are compelling and legitimate grounds for the processing which override your interests, rights and freedoms. You also have the right to object when a decision concerning you is based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you (the law provides exceptions which may apply).
- **the right to withdraw your consent (Art. 7 par. 3 GDPR):** In the event that the processing of your personal data is based on your consent (such as when you ask us to retain your personal data in order to inform you about future employment opportunities in the event of your job application

being rejected), you have the right to withdraw your consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

Please note that the aforementioned rights may be restricted under applicable law.

You also have the right to lodge a complaint with the Hellenic Data Protection Authority (HDPa) if you consider that your personal data are being processed unlawfully or your rights are being violated. The HDPa is based in Athens (1-3 Kifissias Street, P.C. 115 23). Regarding the competence of the HDPa and how to lodge a complaint, you can visit the website of the HDPa (www.dpa.gr).

In the event that you send us a written request for the exercise of any of your above rights, our Company will make sure to respond immediately and in any case no later than one (1) month from the submission of the request and the identification of the applicant. This deadline may, under certain conditions, be extended by two (2) more months in accordance with the applicable legislation.

If you have any questions or queries regarding this Agreement, or wish to exercise any of the above rights, you may contact us in writing at the following email: **info@alkimathens.com**.

For more information, you can also refer to our Company's Privacy Policy, which you will find available at our Website.