

JOB CANDIDATE PRIVACY NOTICE

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1. What is the purpose of this document?

Sovcomflot (Cyprus) Limited and its affiliated Companies are “data controllers”. This means that we are responsible for deciding how we hold and use personal information about you. You are being provided a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation (EC) 2016/679 and applicable data protection laws and regulations (“**Data Protection Laws**”).

2. Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided or has been provided to us in your curriculum vitae and covering letter.
- The information provided or has been provided to us via recruitment agency.
- The information you have provided on your CV, including name, surname, middle name, title, address, telephone number, personal email address, date of birth, place of birth, civil status, gender, employment history, qualifications.
- Any information you provide to us during an interview.

Please note that we will not make use of your particularly sensitive personal information.

4. How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies, from which we collect the following categories of data: the information you have provided on your CV, including name,

surname, middle name, title, address, telephone number, personal email address, date of birth, place of birth, civil status, gender, employment history, qualifications.

5. How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the work.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

6. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

7. Data sharing

Why might you share my personal information within our group of companies and/or third parties?

We will share your personal information within our group of companies in case of recruitment in any other companies of our Group.

Other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

8. Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any supervisory authority of a suspected breach where we are legally required to do so.

9. Data retention

We will retain your personal information for a period of six (6) months from the date of receipt of the information, unless you become our employee.

We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with Data Protection laws.

If you wish us to retain your personal information on file, over and above the six months stated above, on the basis that a further opportunity may arise in future and you may wish us to consider you for that, you should provide us with your explicit consent on your application form to retain your personal information for a fixed period on that basis.

10. Rights of access, correction, erasure, and restriction

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Group's Data Protection Officer in writing: dpo@scf-group.com.

11. Right to withdraw consent

You have the right to withdraw your consent for processing your personal information for the purposes of the recruitment exercise at any time. To withdraw your consent, please contact the Group's Data Protection Officer in writing: dpo@scf-group.com. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

12. Data protection officer

We have appointed a data protection officer [dpo@scf-group.com] to oversee compliance with this privacy policy. If you have any questions about this privacy notice or how we handle your personal information, please contact the [dpo@scf-group.com]. You have the right to make a complaint at any time to the Data Protection Commissioner's Office, the Republic of Cyprus' supervisory authority, for data protection issues.

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E-mail: commissioner@dataprotection.gov.cy

13. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.