

## JOB APPLICANTS' PERSONAL DATA PRIVACY POLICY

This Job Applicant's Personal Data Privacy Policy (hereinafter – **the Policy**) includes details on job applicant's personal data processing procedure applied by MAXIMA GRUPE, UAB (hereinafter – **the Company** or **we**), including the type of job applicant's data we collect and process, purposes/reasons for which we use such data, for how long we keep the data, etc. It is an important information; therefore, we believe that you will read it carefully.

Please note that the Policy may be modified/changed, supplemented, and updated. The updated and most relevant version of the Policy will be always available on the following website: <http://www.maximagrupe.eu/en/career>.

### 1. What types of your data we process and why?

**Personal data** – any information that can be used to identify an individual, also, any information on the person that has been already identified.

#### 1.1. The selection procedure for the job vacancy (-es) and assessment of your candidature

During the selection of successful job applicants to the job vacancies of the Company and assessment of your candidature, we process the following data.

<b>Types/categories of data</b>	<p><u>General information on a job applicant</u>: applicant's name, surname, place or address of residence, e-mail and/or telephone number, details on work/professional experience of a job applicant (employment, employment period, job title/position, responsibilities and/or achievements), details on education of a job applicant (educational/training/vocational institution/body/establishment, training period, completed education and/or acquired qualification), information on further periodic training (training courses attended/completed, certificates obtained), details on knowledge of languages, information technology and driving skills, other competences, other information provided in your CV, cover letter / letter of motivation or other application documentation.</p> <p><u>References, employer feedback</u>: a person recommending a job applicant or providing a feedback on thereof, as well as contact information/details of such person and the content of the reference or feedback provided by such person.</p> <p><u>Details on assessment of a job applicant</u>: summary of an interview with a job applicant, insights and opinions of a person (-s) carrying out the recruitment selection, and job applicant's testing results.</p> <p><u>Special categories of personal data</u> *: – the data on health, data on criminal records for intentionally committed offences.</p>
<b>Legal basis for data processing</b>	Your consent shall be expressed when submitting job application documentation and legitimate interest of the employer to select the most appropriate employee.
<b>Data processing period</b>	For the duration of selection of candidates to the job vacancy (-es) chosen by you and 1 month after the completion of recruitment procedure (to the extent it is technically feasible to perform optimal periodic destruction/deletion of data)

\* we collect and process special categories of job applicants' personal data only in the cases and to the extent they are necessary when performing the selection to a certain position and to the extent permitted by the applicable legislation. During the recruitment process, we will collect and process data on your health in accordance with the applicable laws, to assess your work capacity/physical performance, the compliance/conformance of a workplace to your health condition and/or your ability/capability to work in the conditions where you are exposed to occupational risk. In any event, we will collect special categories of data during the final stages of selection/recruitment process only.

Your consent to process your data provided in your CV, job applicant's application form and / or other submitted application documentation (resume, cover letter / letter of motivation, etc.) for the purpose provided in the

corresponding section of the Policy shall be considered a received when you submit your CV, job applicant's form and / or other documents.

If we receive information about your candidacy and / or your CV and (or) other application documentation from the Labour Exchange of the Republic of Lithuania, employment agencies, job search internet portals, career social networks (e.g. LinkedIn) and / or other job search, recruitment/selection entities and / or mediation service providers (agencies), we shall presume that you have received all the necessary information about the processing of your data and you have given your consent to process your data for the relevant entity providing such services, which includes, inter alia, the right to provide your data to potential employers (including the Company), enabling such potential employers to process your data in the selection (-s)/recruitment for the job vacancy (-es) and your candidacy evaluation/assessment process.

We will collect your personal data from other sources only having obtained your separate consent. For example, we will check the references you provide, or will only contact your employer asking for a feedback only if you give us your consent to contact the employer and / or other person specified by you and receive the feedback on you.

If, after the selection for the relevant job vacancy, we will not choose your candidature and we will not enter into a contract of employment with you, all of your personal data collected for the purpose of selection will be destroyed safely unless we obtain your consent for the inclusion of your data in the Company's database of job applicants as described in Section 1.2 of this Policy.

## 1.2. Managing of job applicants' database

If you wish to be included in the database of our or our corporate group of companies (which includes FRANMAX, UAB and MAXIMA LT, UAB as well as other companies listed on the website [www.maximagrupe.eu](http://www.maximagrupe.eu)) job applicants and receive information about the employee searches and selections (recruitment) performed in the future by us or our corporate group of companies, we will process in the job applicant's database the following data about you.

<b>Types/categories of data</b>	<p><u>General information on a job applicant:</u> applicant's name, surname, place or address of residence, e-mail and/or telephone number, details on work/professional experience of a job applicant (employment, employment period, job title/position, responsibilities and/or achievements), details on education of a job applicant (educational/training/vocational institution/body/establishment, training period, completed education and/or acquired qualification), information on further periodic training (training courses attended/completed, certificates obtained), details on knowledge of languages, information technology and driving skills, other competences, other information provided in your CV, cover letter / letter of motivation or other application documentation.</p> <p><u>References, employer feedback:</u> a person recommending a job applicant or providing a feedback on thereof, as well as contact information/details of such person and the content of the reference or feedback provided by such person</p> <p><u>Details on assessment of a job applicant:</u> summary of an interview with a job applicant, insights and opinions of a person (-s) carrying out the recruitment selection, and job applicant's testing results.</p>
<b>Legal basis for data processing</b>	Your consent
<b>Data processing period</b>	One year after the end of selection/recruitment process

You are free to disagree with the inclusion of your data at the end of the selection and further processing in the job applicant database, as well as withdraw your consent at any time and request removal of your data from the database of job applicants. Your reluctance to be included in our database of job applicants or the withdrawal of your consent will not prevent you from participating in the selection for the specific job vacancy you are applying for.

## 2. From which sources we collect your personal data

Usually we collect your data directly from you - when you respond to our job advertisement and / or provide us your CV, job applicant's application form and / or other job applicant's application documentation (CV, cover letter / letter of motivation, etc.).

We can also obtain the information about your candidacy as well as your CV and / or other application documentation from a job search, selection (recruitment) entities and / or mediation service providers (agencies), for example, from the Labour Exchange of the Republic of Lithuania, employment agencies, job search internet portals, specialized career social networks (e.g. LinkedIn).

We can also receive certain information about you from third parties, e.g. the persons recommending you, your current or former employers. However, we will only collect such information if you give us your consent to contact your employer and / or other person indicated by you and receive a reference or feedback about you.

## 3. Longer data storage

Upon termination of the period of processing and storage of your data as set up in herein Policy (i.e. at the end of the selection (recruitment) process or one year after the end of the selection, in case you have given your consent to it), we will destroy your data and, in the cases specified in the Policy, we will reliably and irreversibly depersonalise your data as soon as possible, within a due and reasonable period of time necessary to carry out such an action.

For the period longer than specifically specified in this Policy, your personal data may only be stored if:

- there are reasonable suspicions of an unlawful act that is being investigated;
- your data are necessary for the proper resolution of a dispute, a complaint;
- there are other reasons provided for in the legislation.

In any event, we may maintain your consent and proof of it for a longer period, if necessary, so that we could defend against requests, claims or actions brought against us.

## 4. In what cases and to which third parties we disclose your data?

We may transfer your data for processing to third parties who assist us in carrying out the selection of job applicants or who provide us the services related with the selection (recruitment), assessment of job applicants and internal management. Such persons may include personnel selection (recruitment) and (or) assessment service providers, database software providers, database management (administration) service providers, data centres, hosting and cloud service providers, etc. In any case, we provide the data processor with only as much data as it is necessary to complete a specific assignment or provide a specific service. Our recruited data processors can process your personal data only according to our instructions and cannot use them for other purposes or transfer to other persons without our consent. In addition, they must ensure the security of your data in accordance with applicable law and written agreements with us.

If you participate in the selection for a leading position, we can submit your candidacy and your data to our controlling companies, which, in accordance with the procedures applicable in our corporate group of companies, shall participate in the processes of assessment of the job applicants for leading employee positions and /or in career-related decision-making processes.

We can also provide your personal data processed in our job applicants' database to our corporate group companies – FRANMAX, UAB and MAXIMA LT, UAB, etc., if, in our opinion, your candidacy may be suitable for employment in the companies mentioned above.

Data may also be provided to the competent [public] authorities and bodies or law enforcement agencies, e.g. the police, law enforcement authorities or supervisory bodies, however, only upon request of thereof and only when required by applicable law or in the cases and under the procedures prescribed by law to ensure our rights, the security of our customers, employees and resources, to bring against, submit, and protect/defend the legal requirements.

## 5. In which territories and jurisdictions we process your personal data

We do not currently intend to transfer and we do not transfer to your personal data to the processors or recipients in the third countries.

## 6. What rights you are entitled to by data protection laws and how you can enjoy these rights?

**The right of access to your personal data which we process:** You are entitled to receive our confirmation that we process your personal data, as well as the right to access your personal data processed by us and the

information about the purposes of data processing, the categories (types) of the data processed, the categories of recipients of data, the period of data processing, and the sources of data obtaining.

**The right for any inaccuracies in personal data to be corrected:** If the data submitted to us in your job application documentation has changed or you believe that the information we process about you is inaccurate or incorrect, you have the right to request that information be amended, revised or corrected.

**The right to withdraw the consent:** You have the right to cancel your consent at any time and request to stop any further processing of your personal data that is carried out on the basis of consent.

**The right to make a complaint:** If you believe that we process your data in breach/violation of the requirements of data protection law, we will always ask you to contact us directly first. Should you be not satisfied with our proposed solution to the problem or, in your opinion, we will not take action as required by your request, you will have the right to file a complaint with the supervisory authority, which in the Republic of Lithuania is the State Data Protection Inspectorate (A. Juozapavičiaus g. 6, 09310 Vilnius; tel. (8 5) 271 2804, 279 1445; e-mail: [ada@ada.lt](mailto:ada@ada.lt)).

**The right to have information/data deleted (the right to be 'forgotten')**: In certain circumstances specified in the data processing legislation (when the processing of personal data is carried out unlawfully/illegally, the reason for the processing of data has gone, etc.), you have the right to request that we delete your personal data.

**The right to restrict the processing of the data:** In certain circumstances specified in the data processing legislation (when the processing of personal data is carried out unlawfully/illegally, you dispute the accuracy of the data, you have filed an objection to the processing of data on the basis of our legitimate interest, etc.), you also have the right to restrict the processing of your data.

**The right to portability of the data:** You have the right to transfer the data we process by applying automated tools (applies only to your data processed in job applicant database) to another data controller. The data you wish to transfer, we will provide to you in the format generally used in our systems and computer-readable, and when requested by you and technically feasible, we will forward the data directly to another data controller, specified by you.

## 7. Request examination procedure

In order to protect the data of all of our job applicants against unauthorized disclosure, we will have to determine your identity upon receipt of your request for the data or for the exercise of your other rights. For this purpose, we may ask you to provide your identity document

Upon the receipt of your request for the implementation of any of your rights and having made ourselves confident in your identity, we shall undertake to inform you without undue delay, however, in any case, not later than one month from the receipt of your request, about the actions that we have taken in relation to your request. Having taken into account the complexity and number of requests, we have the right to extend the one-month period for another two months, having notified you about the extension by the end of the first month and indicating the reasons for such extension.

If your request is submitted by electronically, we will also provide you with an answer by electronic means, except for the cases when this is not possible (e.g. due to extremely large amounts of information) or if you will ask us to respond in another manner.

We will refuse to satisfy your request by a reasoned reply (by informing you in writing) when the circumstances specified in the legal acts are determined.

## 8. By which means and contacts you can contact us

### **9. How secure is your data?**

We use various security technologies and procedures to protect your personal information from unauthorized access, use or disclosure. Our suppliers are carefully selected; we require them to use appropriate tools to protect your confidentiality and to ensure the security of your personal information. However, the security of information transmission over the Internet or mobile communications cannot be guaranteed; any transfer of information to us using the specified methods shall be performed at your own risk.