

Privacy Notice regarding the processing of the Personal Data of potential employees

This notice explains what Personal Data (information) we will hold about you, how we collect it, and how we will use and may share Personal Data (as defined below) about you during the application process for vacancy filling in A.J.K. Bureau of Consultants Ltd (hereby referred to as “AJK” or “Company” or “we”). We are required to notify you of this information, under data protection legislation.

We would like to ensure you that AJK handles your Personal Data with respect to your personality and your rights and in accordance with Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “Regulation”). This Notice addresses all natural persons who are interested in applying for a position at AJK and/or in having any employment relationship with AJK.

“Client” or “Clients” shall mean a natural and/or legal person to whom administrative services and/or other services are provided by AJK.

“Personal Data” means any information about you, that could identify you directly or indirectly, such as your personal information described in paragraph 3.1. below.

“Processing” means any operation or set of operations performed on Personal Data, by automated means or otherwise, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process Personal Data about you.

1. Who collects and holds your Personal Data?

A.J.K. Bureau of Consultants Ltd
1 Naousis Str., 4th Floor Suite 2
P.O. Box 40634, 6018 Larnaca, Cyprus
Tel: +357 24 668800
Fax: +357 24 668866
Email: humanresource@ajkboc.com
Website: www.ajk-group.com

2. Who is the Data Protection Officer (DPO)?

1 Naousis Str., 4th Floor Suite 2
P.O. Box 40634, 6018 Larnaca, Cyprus
Tel: +357 24 668800
Fax: +357 24 668866
Email: dpo@ajkboc.com

3. About the Personal Data we collect and hold:

3.1. What information

We may collect the following Personal Data during your recruitment process:

- Your name, surname, your contact details (i.e. address, fixed and mobile phone numbers, email address).
- Details of your qualifications, experience,(including CV, academic or educational degrees).
- Your nationality and date of birth.
- Details of your references.
- Information about your previous academic and/or employment history, including your salary.
- Information regarding your academic and professional qualifications.
- Your nationality and marital status.
- Copy of your ID or passport and/or a copy of your driving license.

3.2. How we collect the information

We may collect the Personal Data from you, your referees (details of whom you will have provided) your education provider or any relevant professional body.

3.3. Why we collect the information and how we use it

We will typically collect and use the Personal Data for the following purposes:

- to evaluate the potential employees/candidates in order to determine whether or not the potential employee/candidate is suited for a position within the Company.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

3.4. Who we share your data with

We may need to share some of the above categories of Personal Data with other parties, such as HR consultants and professional advisers. Usually, information will be anonymised but this may not always be possible. Sometimes, we may also need to share some of the above categories of personal data with other parties, such as Clients of AJK interested for recruiting. The recipients of the data will be bound by confidentiality obligations. We may also be required to share some Personal Data due to an obligation imposed by law.

We also note that your personal data are generally not transferred to third countries (countries outside the European Economic Area) or to international organisations, unless you provide us with your express consent to transfer the data to Clients located in third countries.

4. How long we keep your information for

We keep the Personal Data that we obtain about you during the recruitment process for no longer than necessary for the purposes for which it is processed. How long we keep your Personal Data for will depend on whether your application is successful and you are employed by us, the nature of the Personal Data concerned, the purposes for which it is processed or according to any relevant Directive of the Commissioner of Personal Data Protection or other applicable law.

We will keep your Personal Data for no longer than 6 months ("Recruitment Period"), after which it will be destroyed. If there is a clear business reason for keeping your Personal Data for longer than the Recruitment Period, we may do so but we will first consider whether the records can be pseudonymized, and the longer period for which they will be kept.

If your application is successful, we will keep all your Personal Data that is necessary in relation to your employment.

5. Your rights

You have a number of significant rights, under the Regulation. Specifically:

(a) right to access your Personal Data (Article 15): meaning you might receive information and/or copy of the personal information we hold free of charge.

(b) right to rectification (Article 16): you might ask us to correct any mistakes in your information which we hold.

(c) right to erasure ("right to be forgotten") (Article 17): you might ask us to erase the personal information concerning you.

However, we reserve the right to deny the erasure, if the processing is necessary for compliance with a legal obligation, for reasons of public interests or for the establishment, exercise or defense of legal claims.

(d) right to restriction of processing (Article 18): you might require us to restrict our processing of your Personal Data if you contest the accuracy of your Personal Data, the lawfulness of the processing, or you have objected to processing (according to article 21) and you wait for our reply whether we have legitimate grounds which override yours.

(e) right to data portability (Article 20): you have the right to request and receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to a third party under certain circumstances.

(f) **right to withdraw your consent:** you reserve the right to withdraw your consent by email at humanresource@ajkboc.com at any time. However, the withdrawal of the consent does not affect the lawfulness of the processing based on consent before its withdrawal.

If you wish to exercise any of the above rights or to ask any questions or clarifications or to complain, please do not hesitate to contact our Data Protection Officer at dpo@ajkboc.com.

Moreover, you also have the right to file a complaint at the Commissioner of Personal Data Protection. For more information concerning the process of filing a complaint, please visit the website www.dataprotection.gov.cy or via e-mail at commissioner@dataprotection.gov.cy

6. Keeping your Personal Data secure

We have appropriate security measures in place to prevent Personal Data from being accidentally lost or used or accessed in an unauthorized way. We limit access to your Personal Data to those who have a genuine business need to have access to it. Those processing your Personal Data will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

7. Does automated decision-making take place?

Automated individual decision-making means the process of making decisions through automated means of processing Personal Data/details, without human intervention (e.g. automated performance assessment).

It is noted that we do not make automated decisions.

8. Is your Data used for automated profiling?

Automated profiling means the automated processing of Personal Data for evaluating your Personal aspects for profiling.

It is noted that we do not use your Data for automated profiling.

9. Changes in this Privacy Notice

We may change this privacy notice from time to time and in such case we will inform you accordingly.

We hope that our HR Department or our Data Protection Officer can resolve any query or concern you raise concerning our use of your Personal Data or regarding this notice.