

## Privacy Notice for Job Applicants

This privacy notice is issued by Alfa Capital Holdings (Cyprus) Limited (together, ‘ACC’, the ‘Company’, ‘we’, ‘us’, or ‘our’) and it concerns natural persons who wish to apply for a position with ACC or submit their resume for future consideration (together, ‘you’, ‘your’).

ACC respects your privacy and is committed to handling your personal data with transparency and integrity. When processing personal data provided by you, ACC is subject to the provisions of the General Data Protection Regulation (EU) 2016/679 (‘GDPR’) and the data protection law of the Republic of Cyprus.

### What information do we collect?

In order to apply for a position with ACC, the following personal data is required from you:

- a. Your name, address and contact details, including email address and telephone number;
- b. Details of your qualifications, skills, experience and employment history;
- c. Information about your entitlement to work in Cyprus.

Data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

### Why do we process personal data?

Your personal data is processed lawfully, fairly and in a transparent manner on the following bases:

- a. The processing of your personal data is necessary to take steps at your request prior to entering into a contract with you and for the performance of the contract to which you will be subject when and if you join the Company.
- b. The processing of your personal data is necessary to comply with the legal obligations emanating from the Cyprus Employment and Labour Law. Compliance with these legal obligations requires, inter alia, the confirmation of a successful applicant's eligibility to work in Cyprus before employment starts. ACC liaises with the Civil Registry and Migration Department of the Republic of Cyprus for the reason set out hereinabove.
- c. The processing of your personal data is necessary for the purposes of the legitimate interests pursued by ACC, where those interests do not put your interests, fundamental rights and freedoms in jeopardy. These legitimate interests include record keeping and management of the recruitment process, confirmation of a candidate's suitability for employment, preparation of our defence in litigation procedures, etc.

If your application is unsuccessful, ACC may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose and you are free to withdraw your consent at any time.

### Who has access to your data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their duties.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. In this case, we will need to perform the necessary background checks.

## How does ACC protect your data?

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is protected against unauthorised or unlawful processing, accidental loss, destruction or damage.

## For how long does ACC keep data?

If your application for employment is unsuccessful, ACC will store your data on file for twelve (12) months after the end of the relevant recruitment process, for consideration for future employment opportunities. If you are not applying for a specific position and you just wish to submit your resume for future consideration, ACC will store your data on file for twelve (12) months after your application. At the end of that period, or as soon as you choose to withdraw your consent, your data will be deleted or destroyed. You will be asked when you submit your CV whether you give us consent to hold your details for 12 months in order to be considered for other positions or not.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personal file, which will be created by the Human Resources department (electronic and paper based). The periods for which your data will be retained, as well as further information on the processing of your personal data, will be provided to you in a new privacy notice.

## Your rights

As a data subject, you have the right to:

- a. Access and obtain a copy of your data on request;
- b. Require the organisation to change incorrect or incomplete data;
- c. Require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- d. Object to the processing of your data.

## Do you have an obligation to provide us with your personal data?

You are under no statutory or contractual obligation to provide data to ACC during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

## Contact details

If you have any questions or concerns relating to the processing of personal data by ACC, you can contact our Data Protection Officer by email at: [GDPR\\_dpo@alfacapital.com.cy](mailto:GDPR_dpo@alfacapital.com.cy) or by letter to 3, Themistoklis Dervis Street, Julia House, 4th floor, 1066, Nicosia, Cyprus.