

PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA OF PROSPECTIVE EMPLOYEES

PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA RELATING TO JOB APPLICATIONS/ SUBMISSION OF CURRICULUM VITAE (CVs) FOR EMPLOYMENT

Ancoria Bank Ltd (hereinafter referred to as the “Bank”) hereby wishes to inform you that, in a transparent way and in full respect to your rights and personality, collects and processes your personal data (which may be hereby referred to as “personal data” or as “data”). This Privacy Notice is addressed to all individuals who are potential employees of the Bank.

The Bank collects and processes your personal data in accordance with the applicable legal and regulatory framework, and particularly with the General Data Protection Regulation (EC) 2016/679 of the European Union (hereinafter referred to as the “GDPR”).

For the purposes of this Privacy Notice, personal means every information about you that establishes or can establish your identity, for example your name and surname, your residential address, your telephone number or your ID/passport number. Further, processing of personal data means any act or series of acts performed on your personal data, including, among others, the collection, recording, organization, structuring, storage, data search, use, any way of disposal, erasure, or destruction.

1. Who is the controller of your personal data?

Controller:	Ancoria Bank Ltd
Registration Number:	HE 324539
Address:	12 Demostheni Severi Avenue, 1 st Floor 1080 Nicosia P.O. Box 23418, 1683 Nicosia, Cyprus
Telephone No.:	+357 22 849001
FAX:	+357 22 849002
Email Address:	info@ancoriabank.com
Website:	www.ancoriabank.com

Contact details of the Bank’s Data Protection Officer:

Address:	12 Demostheni Severi Avenue, 1 st Floor 1080 Nicosia P.O. Box 23418, 1683 Nicosia, Cyprus
Telephone No.:	+357 22 849001
Fax No.:	+357 22 849002
Email Address:	dpo@ancoriabank.com

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2. From which sources is your personal data collected from and how is the processing conducted?

The Bank processes personal data it receives from you during the recruitment process and data which it lawfully receives from third parties (e.g. references).

Indicatively, the personal data collected is the following:

- Personal information (e.g. your name and contact details such as your home address and your email address).
- Other information/documents (e.g. your professional and academic qualifications, as well as your prior work experience).
- Additional supporting documents, where necessary (e.g. copy of an identity document or of your passport).

Additional personal data might be collected related to the abovementioned categories depending on the case and need.

3. Why is your personal data processed and what is the legal basis of this processing?

Below (in paragraphs 3.1 to 3.4) the purposes and the legal basis of processing your personal data are outlined.

3.1 For the performance of a contract (section 6 par. 1 (b))

The Bank processes your personal data in order to be able to complete its recruitment process upon receiving your job application or CV prior to a potential conclusion of an employment contract with you. If such contract is concluded these data are required both for implementing the contract of employment and other related requirements as per the Bank's policy.

3.2 For the purposes of the legitimate interests (section 6 par. 1 (f))

Where necessary and without prejudice to your fundamental rights and freedoms which require the protection of your personal data, the Bank processes your personal data, beyond any contractual obligations, to safeguard the legitimate interests pursued by the Bank or third parties.

Based on the legitimate interests, the Bank mainly seeks to maintain the smooth operation of the Bank, the safety of its clients and employees.

Indicative examples where such process is done or may be done are in the context of:

- the operation and security of the Information Technology (IT) infrastructure of the Bank,
- the Bank's risk management,
- for purposes of improving the services and products of the Bank,
- In the context of recording telephone calls for investigation as well as quality control purposes.

3.3 Due to your consent (section 6 (1) (a))

If you consent to the processing of your personal data for specific purposes, the legal basis for the processing of your personal data is your explicit consent. Note that you can recall your consent at any time. The said recall does not affect the legitimacy of the data processed prior to the recall.

3.4 Due to compliance with a legal obligation (section 6 (1) (f)) and/or the performance of a task carried out in the public interest (section 6 (1) (e))

The Bank is subject to various legal obligations as well as to requirements of regulatory/legal provisions which it is obliged to implement. Depending on the particular circumstances of your job application/submission of your CV for employment with the Bank, the processing purposes may include verification controls of identity.

4. Who receives your personal data?

A. Within Ancoria Bank

In the context of the Bank's operation, various departments of the Bank may receive your personal data. In this manner the Bank will be able to assess your job application/CV for employment at the Bank as well as to carry out its contractual and legal obligations.

B. Outside Ancoria Bank

The Bank may, from time to time, assign the processing of your data to third parties referred to as 'the Processor' (e.g. Human Resources counseling service). In this case, the relevant information to be transmitted will be to the minimum possible and will be used for the particular purpose.

The Bank ensures that the Processor provides the Bank with adequate assurances that it processes your personal data according to the Regulation, also ensuring, at the same time, your rights, as contained in the Regulation (e.g. by signing confidentiality and data protection contracts).

Indicatively, the Processor may be:

- Companies managing technical support services
- Companies/persons providing advisory services, for example consultants on Human Resources matters.
- Companies providing archiving services.

5. How long is your personal data kept for?

A. Job Applications

The Bank processes and stores CVs for the recruitment process. If your application for employment is not successful the Bank maintains your CV for one (1) year in case the job vacancy re-opens.

B. CV Submissions

All CVs submitted, whether as part of a specific job application or to be on-file in case a suitable position/vacancy opens, are kept for a period of one (1) year. If you wish to extend this period for another year please inform us by sending us an email stating this wish.

6. Is personal data transmitted to a third country or to an international organization?

Your personal data is not transmitted to third countries (i.e. to countries outside the European Economic Area - EEA).

7. What are your rights according to GDPR?

Your rights according to GDPR are the following:

- i. **Right to access your personal data** (section 15): You may ask and receive from the Bank information and/or copies of your personal data free of charge.
- ii. **Right to rectification of your personal data** (section 16): You may ask the Bank to correct or complete your data at any time.
- iii. **Right to erasure** ("right to be forgotten") (section 17): You may ask the Bank to erase your personal data. It is clarified that the Bank reserves the right to deny the said erasure, if the processing is necessary for the compliance with a legal obligation, for reasons of public interest and/or for the assertion of legal claims.
- iv. **Right to restriction of processing of personal data** (section 18): You may require from the Bank to restrict the processing of your personal data if you contest its accuracy, the lawfulness of the processing and/or because it is not necessary for the processing purposes it had been collected for and/or when you have already objected to the Bank in processing your data in accordance with the **Right to Object** below and you expect the Bank's position as to the legitimate grounds which override your opposition.
- v. **Right to data portability** (section 20): You may receive, if applicable, the personal information concerning you, in a structured, commonly used and machine-readable format, to transfer it to other organizations/companies or ask the Bank to directly do so on your behalf.
- vi. **Right to object** (section 21): You have the right to object at any time to the processing of your personal data, including profiling, based on the legitimate and/or public interest (section 6 (1) (e) and (f)) when you deem that it is justified due to a particular situation concerning you. In case that you do not agree, the Bank shall no longer process your personal data unless it demonstrates compelling legitimate grounds which override your interests, rights and freedoms or if the processing serves the establishment, exercise or defense of legal claims. Your abovementioned right may be exercised by contacting.
- vii. **Right to withdraw your consent:** As mentioned at point 3.3 above, you reserve the right to withdraw your consent on processing of your personal data at any time. In such case, the withdrawal of the consent does not affect the lawfulness of the processing conducted prior to the withdrawal of your consent.

It is noted that the abovementioned rights apply with the restrictions provided for in GDPR.

If you wish to exercise any of the above rights or to ask any questions in regards to the processing of your personal data, do not hesitate to contact the Bank's Data Protection Officer (dpo@ancoriabank.com)

8. How can you file a complaint?

In case that you have any complaint and/or dispute in regards to the way your personal data is used, you are invited to notify the Bank's Data Protection Officer accordingly (dpo@ancoriabank.com) and the Bank will directly undertake to investigate and inform you in regards to your complaint.

In any case, you are entitled to submit a complaint to the Commissioner of Personal Data Protection. You can find information regarding the filing of complaints on the relevant website (www.dataprotection.gov.cy).

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9. Are you obliged to provide your personal data?

A. Job Applications

In order to be able to review your application for employment at the Bank, during the recruitment process, you have to provide the Bank with your personal data (CV) to the extent that it is necessary for the assessment of your application.

B. CV Submissions

In order to be able to review your CV during a job vacancy for employment at the Bank, you have to provide the Bank with your personal data to the extent that it is necessary for the assessment of your CV.

10. 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. It is noted that the Bank does not make automated decisions in matters of recruitment.

11. 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 the Bank does not use your data for automated profiling in matters of recruitment.

12. Changes or amendments to the Privacy Notice.

The Bank reserves the right to amend the present privacy notice from time to time, by uploading the revised version on the Bank's website (www.ancoriabank.com). In such case the revised number and issuance date of the Privacy Notice will be displayed.

Do not hesitate to contact us through our Data Protection Officer (dpo@ancoriabank.com) for anything you need in regards to the present notice.