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**Recruitment Privacy Policy
within the recruitment process**

No. VP-21-20

History of document's amendment

Version No.	Date	Brief description of amendment
1.0	25.01.2021	Original version of the document (Group's document).
2.0	18.05.2021	Separate version for VIA Payments UAB has been prepared.
3.0	31.05.2022	DPO contact information update.
4.0	23.10.2023	Formatted whole document to the same format as other policies; Updated and added information in the "Purpose of Personal data processing" section; Updated "Contacts" section
5.0.	13.02.2024	Updated Data storage period section; Added Data processors and sub-processors section; Added Interview video recording section.

Artjoms Grivkovs

Managing director

Privacy Policy within the recruitment process

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Definitions

Processing – any activity that involves use of your Personal data (including data collection, registration, storage, view, use, disclosure by sending, disseminating or otherwise making available, alignment, erasure or destruction, etc.).

Personal data – any information that relates to you, for instance, your name, surname, address, phone number, e-mail, information included in CV.

Consent – any confirmation you provide freely and knowingly regarding your Personal data Processing for specific purpose/purposes.

Regulation – Regulation of the European Parliament and of the Council (EU) 2016/679 on the Protection of Individuals with Regard to the Processing of Personal Data and on the Free Movement of Such Data (GDPR).

Company or We – VIA Payments UAB, reg. No. 304531663, legal address: Konstitucijos pr.7, Vilnius, Lithuania, e-mail: info@vialet.eu; Data Protection Officer, dataprotection@vialet.eu.

You – job candidate or a trainee whose Personal Data are processed by us.

Supervisory authority – State Data Protection Inspectorate of the Republic of Lithuania.

General provisions

These provisions describe how the Company carries out the Personal data Processing within the staff recruitment process. We ask you to provide Personal data in order to assess your suitability for the offered position. Non-provision of personal data may limit or prevent the Company from cooperating with you, for instance, the Company will not be able to fully assess your suitability for the vacant position, which could deny the opportunity for you to establish an employment relationship with the Company.

We process your Personal data only for the stated purposes and to the extent necessary in accordance with the requirements of legislation. We do not ask to provide more Personal data than we need. We also guarantee non-disclosure and security of Personal data.

Categories of personal data

For the purposes stated herein and to the extent necessary, we process the following categories of your Personal data:

Categories of personal data	Types and description of personal data
Your identification data	Name, surname, personal identity number, date of birth, personal photo
Your private contact details	Residential address, phone number, e-mail
Information related to the assessment of you as a candidate	CV, application letter and other documents required by the legislation for particular positions' categories; our written notes during the job interview, audio or video recordings made during the job interview;

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	<p>references from your previous employer(s); verified information about you in publicly available registers (validity of personal identification document, information on employment, in some cases – debt history, certificate confirming the absence of any criminal record, etc.); notification of the results of the recruitment process, etc.</p>
<p>Information related to your professional activity and education</p>	<p>Information included in CV: work experience (employers), profession(s), position(s), type(s) of occupation, length of service; education, language skills, driving experience, additional education (training, courses, seminars, certificates obtained, etc.) and other skills; membership of professional and other associations and bodies.</p>
<p>Special categories of personal data</p>	<p>The legislation specifies Personal data of specific categories which we will process if the Processing of such data for the purpose is permitted by legislation. Personal data of special category are, for instance, data related to health, membership in trade unions, data relating to criminal records.</p>

Data processors and sub-processors

We have entered into contractual agreement with Teamtailor Ltd and use its platform for recruitment process. Below is a list of sub-processors engaged by the Teamtailor Ltd for processing personal data on Our behalf.

Name	Service provided	Data processed	Data Center Location
Amazon Web Services EMEA SARL.	Storage, Cloud Computing	All data processed within the service	Ireland
Heroku (SFDC Ireland Ltd.)	Storage, Cloud Computing	All data processed within the service	Ireland
Crunchy Data Solutions, Inc.	Storage	All data processed within the service	Ireland
Pusher Ltd.	Communication between the service backend and web client.	All data visible in the web client	Ireland
Flowmailer B.V.	Email notifications	Email communication and data related to the sender / recipient of the communication (e.g. email and name)	Netherlands
Optidash GmbH.	Image processing	Images	Germany
Datadog, Inc.	Log management	Logs of all events occurring in the service	Germany

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Clickhouse, Inc.	Storage	Event log of CareerSite visits and job ad-related events	Germany
Cronofy B.V	Calendar integration for scheduling interviews and meetings	Contact details, calendar information.	Germany
HrFlow.ai SAS	Parsing from CV files when uploading CVs manually.	Information in CVs	France

Purpose of Personal data processing

Before we begin to process your Personal data, we always assess data processing purposes. The processing of your Personal data is legitimate if we perform it according to at least one of the following grounds:

- **fulfilment of the statutory obligations of the Company, or**
- **on the basis of your provided consent, or**
- **to pursue the legitimate interests of the Company, you or a third party, after assessing whether these interests in processing your Personal data are proportionate to your right to privacy, or**
- **to protect vital interests of you or a third party, or**
- **to carry out tasks in the interests of the Company or to exercise official powers legally conferred to the Company.**

The main purpose of your data processing is to assess the suitability of your application for the employment at the Company.

Collection of personal data

We obtain your Personal data:

- when you provide it to us:
 - when referring to the vacant position advertisement (e.g. information from CV, application letter and other documents requested by the Company and submitted to it);
 - when you contact the Company or the specialists of the involved cooperation partners within the staff recruitment process, also during the job interview by phone, coming to us in person, by e-mail or post.
- when job vacancy portals provide access to your Personal data;
- when provided to us by third parties:
 - recommending you as a candidate for a vacancy;
 - our cooperation partners who process your Personal data on our behalf;
 - based on the Company's request, maintainers of public databases and registers specified in legal enactments.

Interview video recording

To maintain transparency and respect privacy, we notify candidates in advance that the interview will be recorded and transcribed for documentation purposes.

Recipients of Personal data

We transfer your Personal data to:

- **the Company's undertakings**, for instance, on the basis of concluded agreements within the framework of mutual cooperation;

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- **our cooperation partners (processors, controllers, co-controllers)** involved in processing of your Personal data, which we have carefully assessed before beginning the cooperation. For instance, cooperation partners providing support in staff recruitment process;
- **maintainers of databases established according to the procedures specified by legal enactments;**
- **in cases specified by legal enactments**, e.g., to courts, supervisory authorities and other institutions on the basis of a written requests or obligations to the Company specified in legislation, and to other persons specified in legislation;
- **audit firms, legal service providers.**

Within the framework of your Personal data processing, only our authorized employees and employees of our cooperation partners can access your Personal data, which is necessary for the performance of their duties and for the purposes and reasons specified herein, in compliance with the technical and organizational requirements for the processing of Personal data set out in the legislation on the protection of personal data, as well as in the internal regulations of the Company.

Automated decision-making and profiling

When processing your Personal data for the purposes set out herein, we do not make automated decisions and do not use profiling.

Transfer of personal data outside the EU/EEA

We ensure storage of your Personal data within the territory of the European Union and the European Economic Area.

Taking into consideration global nature of entrepreneurial activities and technological solutions, in order to ensure your Personal data processing for the purposes stated herein, your Personal data may be transferred for Processing purposes to the Personal data recipient located outside the territory of the European Union and the European Economic Area, for instance, if the provision of services is ensured by a cooperation partner (processor, individual controller, joint controller). Any such international transfer of Personal data is carried out in compliance with the requirements of the Regulation, and in these cases, we comply with the Personal data Processing procedures laid down by law and ensure protection level, equivalent to that laid down in the Regulation.

Data storage period

To pursue the legitimate interests of the Company, you and third parties, for instance, after the end of the staff recruitment process, the documents submitted by you as a rejected candidate, are stored for 6 months, taking into consideration possible claims against the Company in accordance with labour law.

Towards the end of the storing period, you will receive an email asking for your permission to keep this information for another 6 months. You will need to actively approve this request.

If your job application is successful and you accept a position, the personal data collected during the recruitment process will be added to your human resources file and retained for the duration of your employment.

Your rights

Within the framework of compliance with the requirements of privacy and personal data protection legislation, the Company grants you the right, by submitting a written request to the Company:

- **access your Personal data;**
- **correct your Personal data.** If your personal data is inaccurate, you have the right to have the data rectified without undue delay;
- **delete your Personal data;**

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- **restrict Processing of your Personal data;**
- **transfer your Personal data.** You can obtain your personal data from the Company, in a format that makes it easier to reuse your information in another context, and to transmit this data to another data controller of your choosing;
- **object to Processing of your Personal data;**
- **withdraw your Consent to your Personal data Processing** for the relevant purpose for which it was given at any time. However, you should consider that such withdrawal of consent will not affect the lawfulness of your Personal data protection before the withdrawal of consent.

Submission of claims

The Company confirms that it ensures your Personal data processing in accordance with the requirements of the Regulation, other European Union and national legislation and this Privacy policy. However, if you believe that we have violated your right to privacy by processing your Personal data, you have the right to submit a claim to protect your interests to the Company, the Supervisory authority or court.

Contacts

In case of questions related to your Personal data processing, you can contact us by writing to the e-mail address of the Company, or by contacting a Personal data protection specialist, and you will be provided with all necessary information related to your Personal data processing, including answers to unclear questions. All the information will be handed over to the employee in charge, who will provide a response to your request.

HR department – hr-vialet@vialet.eu

DPO – dataprotection@vialet.eu