

## Privacy Policy

### **information on the processing of personal data**

#### **Why are we presenting you with this information on the processing of personal data?**

The purpose of this document is to provide you with information about the processing of personal data that we collect, why we collect such data, how we use them, what sources we collect them from, what the purpose of their collection is, who we may provide with such personal data and where you can obtain further information on which of your personal data are processed and how they are secured.

If you have used our services in the past, you probably know that we offer employment agency services, in person, through the website [www.grafton.sk](http://www.grafton.sk) or in other ways, including partner websites or social media. This information leaflet on the processing of personal data applies to all personal data that we collect through the above-mentioned platforms or in other ways associated with these platforms.

#### **Grafton as the controller of personal data**

**Grafton Slovakia s.r.o.**, Comp. Reg. No.: 46113282, registered office at Obchodná 2, 811 01 Bratislava, is the controller of your personal data. The fact that our company is the personal data controller means that we comply with the principles of personal data processing and that we handle your personal data only in accordance with the applicable laws and regulations, including without limitation Regulation (EU) 2016/679 of the European Parliament and of the Council of 27<sup>th</sup> April 2016 (General Data Protection Regulation) (hereinafter referred to as the “**GDPR**”), we decide on the purpose and means of processing of your personal data and ensure that your personal data are properly secured. We protect your personal data using state-of-the-art technology and continuously evaluate and update our procedures for the protection of your personal data.

#### **Why do we process your personal data?**

Whether you are looking for a job, responding to a particular advertisement, creating a profile on our website, providing us with your CV (directly or as part of our recruitment processes and search for suitable candidates) or otherwise contacting us to obtain job information (electronically, in writing, through our recruitment form, by phone, etc.), you provide us with your personal data that we handle during the entire process of filling vacancies and in the provision of our services. All our services are related to job search, recruitment processes, search for suitable candidates and personal development.

The processing of personal data helps us in our activities as an employment agent and also helps us provide related services which include, among other things, replies to your response to a job advertisement and correspondence between you and your potential employers during the recruitment process.

The provision and processing of some of your personal data is a legal requirement (e.g. for record-keeping purposes under the Employment Services Act) and if you do not provide us this personal data, we will not be able to provide you with some of our services.

We process your personal data for legitimate reasons only. Unless otherwise stated, we process jobseekers' personal data on the basis of a request sent in accordance with Article 6 (1) (b) of the GDPR, i.e. for the purpose of implementing measures before entering into an employment contract. We may subsequently retain your personal data if this is necessary for the establishment, exercise or defence of our legal claims, for reasons of our legitimate interest.

In accordance with Article 6(1)(c) of the GDPR, we may also process some of your personal data on the grounds that it is necessary for the performance of our legal obligation, e.g. pursuant to Act No. 5/2004 Coll. on Employment Services and on amendments and additions to certain acts.

Based on your consent, we send you other suitable job offers, or we process your personal data for marketing and statistical purposes to the extent of the consent granted. You can withdraw your consent at any time via e-mail sent to [dpo.sk@grafon.sk](mailto:dpo.sk@grafon.sk). Withdrawal of the consent, however, does not affect the lawfulness of processing based on consent. All information on the

processing on the basis of your consent can be found in the Conditions of the Consent Given section.

### **What personal data do we process?**

We may process the following personal data or categories of personal data. This does not mean that we process all the personal data listed below for each candidate. For example, we cannot list all personal information with which job seekers provide us in their resumes and other related documents. Please note that the list below may not be complete.

- Name and surname
- Academic degree, educational attainment
- Address of permanent residence, contact address
- Address of place of residence in the Slovak Republic (if a citizen of a Member State of the European Union or a third-country national)
- Name of the State of which the citizen of a Member State of the European Union or third-country national is a citizen
- Nationality
- Date and place of birth
- Birth number or other identifier (if a citizen of a Member State of the European Union or a national of a third country)
- Sex
- Telephone number, e-mail address
- Name, registered office, organisation identification number or other identifier, if the employer is established abroad, and type of economic activity of the employer with whom the employment for remuneration was arranged
- Type of employment relationship or similar employment relationship mediated
- Name of the State, if the employment for remuneration was arranged abroad
- Date of placement
- The period during which the placement is to be carried out or the duration of the employment relationship with our company as a temporary employment agency
- Date of actual commencement of the placement and duration of the placement
- The duration of the temporary assignment of the agency worker to the user employer
- Date of early termination of the temporary assignment
- Expected remuneration / salary

- Driver's licence
- Information stated in your CV, in your profile on our website, attachments to your response to an advertisement or your request for information
- Work experience/information on previous and current employment
- Information on registration at the Labour Office
- Photographs (if you provide them as an attachment to your CV)
- Link to your profile on social media and your profile's content
- Information on starting a job, salary, termination of employment
- Knowledge of languages, special skills and professional qualifications
- Evaluation of personality characteristics

Our website allows you to attach attachments to responses to advertisements for specific positions. You send such attachments voluntarily, and the personal data contained therein will be processed for the purpose of evaluating your suitability as a candidate for the position.

If you create a candidate profile on our website, we allow you to link your response to a job advertisement with your accounts on social media (such as LinkedIn or Facebook). If you choose to provide a link to your account on social media, we may process not only such a link but also the data that are publicly available on such a link, though only in connection with our employment agency activities and for the purpose of placement. The rules for registration and use of the candidate's profile are governed by the [General Terms and Conditions](#). Our external partner (third-party contractor), Freely Agency s.r.o., ID: 05758319, seated on: Slezská 844/96, Vinohrady, 130 00 Praha 3 takes care of candidate profiles on the web sites [www.grafton.sk](http://www.grafton.sk). Our contractor is in the role of processor of personal data. You can delete your candidate account anytime, the processor will delete all the data connected to the candidate profile in such a case.

## **Profiling**

We collect personal data to make the recruitment process easier for candidates and to make evaluation of your skills, experience, qualifications and suitability for current and future job positions that you may be interested in easier for clients. Including without limitation, we evaluate whether you as a candidate are suitable for the position and also that your education,

experience and language skills meet the requirements of the advertised position, and whether the remuneration offered is in line with your expectations. This evaluation process can be categorised as profiling of personal data to the extent of Article 4 (4) of the GDPR.

### **Where do we get your personal data?**

We obtain most of the personal data that we process directly from you (e.g. through our website, responses to job advertisements, trade fairs or other events, from your business card you give us, etc.). Sometimes we also receive your personal data from third parties, such as job portals or your previous employers if you have provided us with their contact details, and from our clients if an employment contract or other similar agreement has been entered into.

### **How long do we retain your personal data?**

We process personal data only for the time that is absolutely necessary for the purpose which we process the data for. Most often, for the period of the selection process for a specific job position, and subsequently, if, at least, your contact has been disclosed to an employer, for the time strictly necessary for the establishment, exercise or defence of our legal claims. If you have given your consent to the processing of personal data or have registered on our website, we process the relevant personal data only until your consent is withdrawn or your registration is cancelled.

If we find that your data are no longer necessary for any of the purposes for which they have been processed, we will erase such data.

### **Who do we transfer your personal data to?**

As we process your personal data for the purpose of our activities as an employment agency and to provide related services, we transfer your personal data to employers looking for employees for advertised positions or advertisements created by Grafton. In this case, Grafton and such a potential employer are independent controllers of your personal data. Based on your consent, your personal data may be transferred for the purpose of arranging employment to other

companies from Gi Group in the Slovak Republic, which we work closely in the field of employment placement activities (scroll down to see more details).

Your personal data may also be provided to any authorised public authorities, institutions or other entities in compliance with the applicable statutory requirements. Where required for the purpose of processing, your personal data may be transferred to our third-party contractors who provide us with support during the recruitment process. Such third-party contractors may be in the position of processors of your personal data, in which case a personal data processing contract is always entered into with such contractors.

### **What are your rights?**

You have the right to request information about your personal data as well as the right to access them. You also have the right to obtain from us rectification or erasure of your personal data or restriction of their processing. You may also object to the processing of your personal data or request the portability of such data. However, please keep in mind that we do not always have to comply with your demands, especially if the processing is carried out under laws and regulations or for our legitimate interest.

You also have the right to address your claim, complaint or other inquiry directly to the Office for Personal Data Protection with its registered office at Hraničná 12, 820 07 Bratislava 27, phone: +421 2 32 31 32 14, e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk).

### **Contact details of the Data Protection Officer**

Should you have any questions regarding the processing of your personal data, please contact our data protection officer at the e-mail address: [dpo.sk@grafton.sk](mailto:dpo.sk@grafton.sk).

## Terms and Conditions of Express Consent to the Processing of Personal Data

**I give my consent for Grafton Slovakia s.r.o. and other companies from Gi Group in the Slovak Republic to help me find a better job.**

By checking the box, you give consent for Grafton Slovakia s.r.o., Comp. Reg. No.: 46113282, registered office at Obchodná 2, 811 01 Bratislava, to process your personal data in order to send suitable job offers that correspond to the position you have selected. We will keep the contact details, your CV, cover letter and other information you provide us with in a dedicated database. We will send you any job offers that we evaluate as interesting for you to your e-mail address or telephone number.

If you do not have a user account yet, you can register [here](#). You can set up the smart filter of incoming offers incl. choice of location, country, type of employment, field and according to chosen keywords thanks to a user-friendly interface.

For us to ensure the most suitable possible job offers on the labour market, we are cooperating with other companies from the Gi Group in the Slovak Republic. In order to find these job vacancies, we may share, only with your expressed consent, your personal details.

Consequently, you will have a chance to learn about these offers at all companies without having to register multiple times or creating multiple user accounts.

In addition to Grafton Slovakia s.r.o., the Gi Group in the Slovak Republic currently comprises the following companies: **Gi Group HR Services Slovakia s.r.o.**, comp. reg. no.: 50631080, with its registered office at Obchodná 2, 811 01 Bratislava and **Grafton Outsourcing Services s.r.o.**, comp. reg. no.: 47657073, with its registered office at Obchodná 2, 811 01 Bratislava. Should the Gi Group in the Slovak Republic expand by another company or companies in the future, we will always notify you by email, sufficiently in advance, of all the necessary relevant information.

In addition to other services, Grafton Outsourcing Services s.r.o. also handles finding professional contracted jobs for qualified experts such as independent entrepreneurs. So that

we can find the most suitable and interesting opportunities possible, we may send you, with your expressed consent, offers of cooperation of this type in addition to job offers. In these cases, Grafton Outsourcing Services s.r.o. processes your personal data to the same extent, for the same purposes, on the same legal grounds, using the same methods and generally under the same conditions as Grafton Slovakia s.r.o. These are specified in detail in the document Information on Processing Personal Detail found above – with the only difference being that processing your personal data does not involve finding full-time employment, or rather entering into an employment contract between you and your new employer but just finding professional contracted jobs for you as a qualified expert in the position of an independent entrepreneur, or rather entering into the appropriate agreement between you and the party interested in your services.

When providing recruitment services, all companies from the Gi Group are independent controllers to the extent of the General Data Protection Regulation (GDPR). Mutual responsibilities for the fulfilment of legal obligations are defined between the companies so that the assertion and exercise of your rights is very simple. This means that you can exercise all your rights in connection with the processing of your personal data via e-mail to the common dedicated email address [dpo.sk@grafton.sk](mailto:dpo.sk@grafton.sk).

**I am also interested in working abroad and I want to know about suitable job opportunities.**

Grafton Slovakia s.r.o. and other companies from the Gi Group in the Slovak Republic are part of an international group providing recruitment services in more than 40 countries in Europe, Asia, America and Africa. By checking the box, you give consent for us to register you in a common database of people seeking jobs abroad. Subsequently, we will also inform you about suitable job offers outside the Slovak Republic. Unless we otherwise agree with you, we will only try to place you in the European Union under your consent.

Our representation in the Member States of the European Union keeps expanding. An up-to-date list of companies we can share your personal data for the purpose of placing you abroad with can be found at the link [here](#). The companies are independent controllers for the purpose of placing you in a suitable job on the basis of the criteria you have set up. You can exercise all

your rights in connection with the processing of your personal data via e-mail to the common dedicated email address [dpo.sk@grifton.sk](mailto:dpo.sk@grifton.sk).

**I would like to have full support when looking for a job, including any information and tips on how to better present myself on the labour market, and news about the labour market, including the Employee Referral Program.**

About once a month, we will send you information about the labour market and opportunities to succeed to your registered e-mail address. We will also inform you if we have launched an Employee Referral Programme for any position. It is an opportunity to get a financial reward for recommending someone you know to the wanted position.