

CANDIDATES ' PERSONAL DATA PROCESSING RULES

I. GENERAL PROVISIONS

- 1.1. Candidate's data processing rules (hereinafter - the Rules) regulate the processing of Personal Data at Nordic Crew Supply Limited (hereinafter - NCS), ensuring compliance with 2016 April 27 Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of Personal Data and on the free movement of such data and which repeals Directive 95/46/EC (General Data Protection Regulation) and other legal acts that determine the processing and protection of Personal Data.
- 1.2. The purpose of the Rules is to provide basic organizational measures for Personal Data processing and Personal Data protection of persons participating in personnel selection. The processing of Personal Data in registers and information systems managed by NCS is regulated by the provisions of these registers and information systems.
- 1.3. The provisions of these Rules apply to natural persons participating in the personnel selection(s) announced by NCS and its affiliates.

II. USED TERMS

- 2.1. Terms and abbreviations used in the Rules have the following meanings:
 - A. Personal Data - any information relating to a natural person that can be directly or indirectly identified.
 - B. Person - a natural person whose data is processed (e.g., employees, Candidates, interns who apply to NCS, submit applications, requests, Candidates participating in the selection, etc.).
 - C. GDPR - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
 - D. Data processing - any action performed with Personal Data.
 - E. Group/Group of companies – NCS and legal entities controlled directly and indirectly by it or them and or the beneficial owners of it.
 - F. Company - a company (data controller) that has announced the selection for the position in which the Candidate is participating.
 - G. Candidate - a person participating in personnel selection.
 - H. Other terms used in the Rules are understood as defined in the legal acts regulating the protection of Personal Data (GDAR and others).

III. PURPOSES AND LEGAL BASIS OF PROCESSING PERSONAL DATA

- 3.1. NCS processes Personal Data only for specific purposes, in accordance with the legal bases established in legislation:
 - A. when it is necessary to process the data in order to conclude and/or execute an agreement concluded with the Person;
 - B. The person has given consent for his / her data to be processed for one or more specific purposes;
 - C. NCS must process Personal Data in compliance with the requirements of legal acts;
 - D. Personal Data must be processed for NCS's legitimate interest.
- 3.2. The main goals pursued by NCS when processing Personal Data:

- A. The solution of the submitted questions. NCS processes Personal Data in the course of examining and resolving submitted questions, complaints, based on contract, consent or legal requirements.
- B. Conducting personnel selections and or selections for provision of services. NCS processes Personal Data when Persons submit their resumes (CVs) and other information to participate in job vacancies advertised by NCS or to complete internships on consent basis.
- C. Verification of the impeccable reputation of Candidates. NCS processes Personal Data by performing an impeccable reputation check on the basis of legitimate interest or legal requirements.
- D. Conclusion and execution of employment and or service agreements. NCS processes Personal Data, when concluding and seeking to conclude an employment agreement with the Candidate or on the basis of the execution of the employment agreement.
- E. In each case, the Company organizing the selection for a specific position is considered the Candidate's data controller, and the Company performing the selection is considered the data processor.
- F. In all of the above cases, NCS processes Personal Data only to the extent that it is necessary to achieve the respective clearly defined and legitimate purposes, taking into account the requirements for Personal Data protection.

IV. SCOPE OF PROCESSED PERSONAL DATA (CATEGORIES)

- 4.1. Main categories of Personal Data and data processed by NCS for the purposes and legal bases listed above:
 - A. Identity data - name, date of birth, etc.;
 - B. Contact data - address, telephone number, e-mail address, etc.;
 - C. Professional data – education, qualification, professional abilities, subject characteristics, etc.;
 - D. Other data that NCS processes in accordance with the legal bases established in legal acts.

V. PROCESSING OF CANDIDATE DATA FOR PERSONNEL SELECTION PURPOSES

- 5.1. NCS processes Candidates' Personal Data in order to assess the Person's suitability for the position or work functions.
- 5.2. The Personal Data that the Person submitted to NCS when sending his/her resume (CV) and other information in order to participate in the selection for a job position or internship at NCS or another Company of the Group, are stored and used in the selections announced by the Group for 3 (three) months after the evaluation of the Person's application (both successful and unsuccessful), voluntary refusal to participate in the selection or until the Person withdraws his/her consent to such data processing. It should be noted that if the Person submitted his/her application again within 3 months, the Personal Data storage term is calculated from the evaluation of the last application.
- 5.3. Data on participation in all selections of persons who apply to participate in more than one ongoing selection, i.e., all positions for which the Person has applied, are visible to the persons performing the selections. These data will be processed (visible in the system) as long as other Personal Data of the Candidate is processed, depending on the submission of his consent or until the Person withdraws his consent to the processing of Personal Data.
- 5.4. Persons who have expressed their desire to participate in the selections for a job position or an internship announced by the Group, are responsible for transferring their data to the Company and have the unlimited right to manage this data.



- 5.5. It should be noted that in order for a person to be able to participate in the selections announced by the Company(s), he must agree to the processing of his Personal Data as a Candidate by noting that he has read and understood the Company's Rules.
- 5.6. Persons who, when submitting their application to participate in the selection, did not give their consent to the use of their Personal Data in the announced selections, will be asked to provide it. The Candidate must provide consent to the use of his / her Personal Data in the selections carried out in Group Companies within 30 (thirty) calendar days after the notification has been sent to him / her.
- 5.7. reminder about the request for consent to the use of Personal Data in ongoing selections is sent twice:
- A. 7 (seven) days before the end of the aforementioned term;
 - B. 48 (forty-eight) hours before the end of the aforementioned term.
- 5.8. It should be noted that if the Candidate does not provide any response within 30 (thirty) calendar days after sending the notification, his / her data will be automatically deleted from the database of selections carried out in Group Companies.
- 5.9. The Company operates a recommendation system, in which the employees of the Group Companies provide information about potential Candidates. The recommending employee undertakes to inform the potential Candidate about the provision of his / her Personal Data to the Company. After submitting a recommendation about a potential Candidate, the recommended Candidate receives an automatic letter with a request to allow the use of his / her Personal Data in the selections carried out in Group Companies.
- 5.10. Group Companies in their activities are guided by the principles of transparency, impartiality, zero tolerance for corruption, therefore one of the requirements for Candidates is an impeccable reputation. For this purpose, the Company collects the publicly available Personal Data of the Candidate who is applying for a position or to perform work functions, related to an impeccable reputation. For the verification of Candidates who are offered an employment agreement, the Company requests to provide the following Personal Data - name, surname, date of birth, when Personal Data is collected on the basis of legitimate interest. The Company processes the Personal Data of Candidates who are offered an employment agreement for positions with a high level of corruption risk or for strategic positions in the scope and basis provided by the requirements of legal acts. Candidates' Personal Data relating to check of impeccable reputation are stored for 10 years after the termination of the employment agreement. Employment agreement will only be concluded with the Candidate after receiving a positive inspection result due to his / her impeccable reputation.
- 5.11. The Company may collect Personal Data of a Candidate applying for positions or work functions, related to qualifications, professional abilities and professional qualities, from a former employer after informing the Candidate beforehand, and from Candidate's current employer only after obtaining the Candidate's consent.

VI. OBTAINING PERSONAL DATA

- 6.1. The Company processes Personal Data provided by the Persons themselves or the Company receives them from other sources:
- A. Upon a referral from an employee of a Group;
 - B. Career social networks (e.g., LinkedIn, etc.);
 - C. State, law enforcement institutions (only for positions with a high level of corruption risk or strategic positions);
 - D. Third parties (e.g., Candidate's current and/or former employer) etc.
- 6.2. In all the cases mentioned above, the Company processes Personal Data only to the extent that it is necessary, ~~guided by an agreement, consent~~ legal acts or the legitimate interest of the Company.

VII. PROVISION OF PERSONAL DATA

- 7.1. The Company, in compliance with the requirements set out by legislation, may transfer processed Personal Data to the following categories of data recipients:
- A. To the service providers. The Company may transfer processed Personal Data to third parties acting on behalf of the Company and/or at its direction, providing the Company with software rental, maintenance, labour relations administration, accounting, sending correspondence and other services, in order to ensure proper provision, management and development of the Company's services. In such cases, the Company takes the necessary measures to ensure that the used service providers (data processors) process the provided Personal Data only for the purposes for which they were provided, ensuring appropriate technical and organizational security measures, in compliance with the Company's instructions and the requirements of valid legal acts;
 - B. To the Group companies. The Company, in compliance with the requirements provided for by legislation, may transfer processed Personal Data to other companies of the Company Group in order to properly perform the selection for a vacant position in the Company or another company of the Group.
 - C. To authorities, law enforcement and supervisory institutions. The Company may provide processed Personal Data to government or law enforcement authorities (e.g., police, prosecutor's office, Financial Crimes Investigation Service, etc.) when required by applicable legislation or to ensure the legitimate interests of the Company, employees or third parties;
 - D. To other third parties. The Company may provide Personal Data to other data recipients based on the legal grounds defined in the legislation.

VIII. SAFETY MEASURES APPLIED

- 8.1. The Company ensures the confidentiality of Personal Data in accordance with the requirements of applicable legislation and the implementation of appropriate technical and organizational measures to protect Personal Data from unauthorized access, disclosure, accidental loss, alteration or destruction or other illegal processing.

IX. AUTOMATED DECISION MAKING AND PROFILING

- 9.1. The Company does not process Personal Data by means of automated individual decision-making, including profiling, as provided for in Article 22 of the Regulation.

X. RIGHTS OF PERSONS

- 10.1. A person who has contacted the Company and confirmed his identity has the right to:
- A. get acquainted with their Personal Data processed by the Company;
 - B. demand correction of incorrect, incomplete, inaccurate Personal Data;
 - C. request deletion of Personal Data or to suspend, except for storage, the processing of Personal Data, if this is done in violation of the requirements of applicable legislation or the Personal Data is no longer necessary to achieve the purposes for which it was collected or otherwise processed;
 - D. receive Personal Data related to him/her, which the Person has provided, in a structured, commonly used and computer-readable format;
 - E. restrict the processing of their Personal Data in accordance with applicable legislation, e.g., for the period during which the Company will assess whether the person has the right to request that his Personal Data be deleted;



- F. to object to the processing of your Personal Data and/or in the event that Personal Data is processed on the basis of consent - to withdraw the given consent to the processing of your Personal Data at any time, without affecting the legality of Data processing based on consent until the withdrawal of consent.
- 10.2. You can contact the Company regarding the Rules or processing of Personal Data carried out by the Company in writing at the following address in Cyprus 12 Egypt Street 1097 Nicosia, Cyprus, or via e-mail to dataprotection@nordiccrewsupply.com
- 10.3. If it is not possible to resolve issues related to the Company's processing of your Personal Data and/or your rights, you also have the right to file a complaint with the supervisory authority – In Cyprus Office of the Commissioner for Personal Data Protection, kypranoros 15, Nicosia 1061 , Cyprus, commissioner@dataprotection.gov.cy.

XI. EFFECTIVENESS AND CHANGES TO THE RULES

- 11.1. These Rules contain the main provisions for the processing of Personal Data of Candidates. Additional information about how the Company processes Personal Data may be provided in the Company's contracts, other documents, on the website or through remote channels (e.g., e-mail, etc.).
- 11.2. In the event of changes in legal requirements and/or Company processes, etc., the Company has the right to unilaterally change and/or supplement these Rules. The Company will inform about changes to the Rules by announcing them on the website. In certain cases, the Company may also inform Persons about changes by mail, e-mail, or by other means (e.g., by publication in the press).

XII. FINAL PROVISIONS

- 12.1. The supervision and control of the implementation of the requirements provided by the Rules is ensured by the employees of the Company's human resources and legal departments.
- 12.2. The Rules and their changes are coordinated with NCS Data Protection Officer.

