

PROSPECTIVE EMPLOYEES' PERSONAL DATA PROCESSING POLICY

No.	HRP-05
Owner Unit	Human Resources
Version	1.0
Date	May 2023

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I. CONTROLLER'S DETAILS & SCOPE

The company under the company name «ΘΕΑ ΑΡΤΕΜΙΣ - ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ ΔΙΑΧΕΙΡΙΣΗΣ ΑΠΑΙΤΗΣΕΩΝ ΑΠΟ ΔΑΝΕΙΑ ΚΑΙ ΠΙΣΤΩΣΕΙΣ» and distinctive title «THEA ARTEMIS FINANCIAL SOLUTIONS A.E.D.A.D.P.», having its registered seat at Karneadou St 25-29 (post. code 10675), Athens, Greece, under registration number 141954501000 and VAT number 997009785, Greece [herein referred as “we”, “Company” or “Thea Artemis”] is the Data Controller of the prospective employees’ personal data, in accordance with the Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter referred to as "GDPR") and the relevant provisions of Greek legislation on the protection of personal data, as applicable.

Herein, we inform our potential employees about the way we process the personal data which they provide to us during the recruitment procedure, from the stage of their job application submittance until the stage of their selection for working with us or their rejection.

In case of your selection, you will be informed by our Company for the way it processes the personal data of its employees as their Employer through its relevant Employees’ Personal Data Processing Policy.

II. CATEGORIES OF PERSONAL DATA AND SOURCES

A. Application Submittance

We ask from you to provide us with the following categories of personal data when submitting your application to join our team:

1. Identification details, i.e., first name, last name.
2. Contact details, i.e., e-mail, phone number.
3. Curriculum Vitae (Resume), i.e., education, working experience, skills details.

B. Application Assessment

We may ask you to attend an interview, in order to assess your application. In such case, we collect, and process information generated by you and by us:

1. Information you provide to us during the job interview, i.e., your answers to certain questions relevant to the job role.
2. Information generated by us during the job interview, i.e., interview notes.

Our Company, in order to assess your job application, may collect a reference note about you from your previous employer, only under your consent.

C. Conditional Offer of Employment Acceptance

If we send to you a conditional offer of employment and you accept it, we'll ask you for additional information so that we can carry out pre-employment checks before hiring. We must confirm the identity of our staff and their competency, trustworthiness, integrity and reliability. At this stage, we process the following categories of personal data you provide to us:

1. Identification details, i.e., proof of your identity, father's name and mother's name, ID number, gender, date and place of birth, nationality, a passport type photo of yours.
2. Contact details, i.e. postal and e-mail address, telephone number (landline, mobile).
3. Curriculum Vitae (Resume), i.e., proof of education degrees & diplomas, foreign language degrees & certificates, certificates of professional training seminars (if any), working experience certificates.
4. Personal & Family Status Details, i.e., certificate of IKA or AMA stamps, Tax Identification Number and relevant certificate, Social Insurance Identification Number (AMKA), marital status, dependent members.
5. Solemn Declaration re. your criminal records, i.e, any convictions or in progress criminal proceedings making you incompetent or unsuitable for the job role.
6. Solemn Declaration re. the fulfillment of army services obligations.
7. Bank Details, i.e., bank account number.

During hiring, you will be informed by our Company for the way it processes the personal data of its employees as their Employer, through its relevant Employees' Personal Data Processing Policy.

III. Purposes and legal basis for processing

Our Company collects and processes your personal data to the required extent, in order to assess if you meet the recruitment conditions for our cooperation.

Especially, we'll use your contact details to contact you to progress your application (e.g., job interview appointment). We'll use the information you provide to us with your application or during the job interview and the recruitment procedure in order to assess your suitability for the job role.

The legal basis of processing your personal data is mainly par. 1 (b) of art. 6 of GDPR, according to which we process your personal data as it is necessary in order to take

steps at your job request prior to entering into a contract with our Company. We rely for your personal data processing on your given consent, in accordance with par. 1 (a) of art. 6 of GDPR, in case of the reference note collection from your previous employers, as well as in case of your rejection and your information for future job opportunities.

IV. Data Retention Period

In case you are hired, you will be informed about how long we hold your personal data by our Employees' Personal Data Processing Policy, which is communicated to all Employees by our Company.

The personal data of prospective employees whose job application is rejected shall be retained for six months after the fulfillment of the recruitment procedure.

If your job application is rejected, but you have asked from us to keep your personal data in case of possible job opportunities, your personal data will be kept for the period that you have given your consent to.

After the expiry of the above data retention periods, your personal data will be erased/destroyed lawfully and safely according to our procedures and policies.

V. International Transfer

Thea Artemis transfers personal data in accordance with applicable laws. Your personal data are not transferred outside EU/EEA. To the extent that, in the context of and for the needs of the above-mentioned purposes, your personal data need to be transferred outside EU, such data transfer will take place in accordance with applicable law and Thea Artemis will ensure an adequate level of data protection. By way of entering into appropriate data transfer agreements based on Standard Contractual Clauses, which are accessible upon request at info@thea-artemis.com or taking other measures to provide an adequate level of data protection. Thea Artemis establishes or confirms that all data recipients will provide an adequate level of protection for your personal data.

VI. Your Rights

You may exercise, as the case may be, the rights deriving from the applicable Greek Legislation and the GDPR which are as follows:

- a. the right of information (article 13),
- b. the right of access (article 15),
- c. the right to rectification (article 16),
- d. the right to erasure “right to be forgotten” (article 17),
- e. the right to restriction of processing (article 18),
- f. the right to data portability (to receive your personal data in a structured and commonly used format - article 20 where applicable) and g. the right to object (article 21) which applies to certain data processing activities.

In addition, as we require your explicit consent to process your personal data (such as in case you ask from us to keep your personal data in case of your rejection in order to inform you for future job opportunities) you have the right to withdraw your consent at any time by contacting us by following the instructions below.

More specifically your rights are the following:

Right of access

You may contact Thea Artemis to explain to you if and which data retains for you, as well as the way we process such data. You may also request a copy of your personal data which Thea Artemis retains for you.

Right to rectification

If you believe that your data are not accurate or need to be updated, you have the right to obtain the rectification of inaccurate personal data and to have incomplete data completed.

Right to erasure

Under certain circumstances, e.g., the personal data are no longer necessary, you withdraw consent, the data have been unlawfully processed, you have the right to obtain the erasure of personal data.

Right to restriction of processing

If you believe that your data are not accurate or their processing is unlawful or you think that Thea Artemis does no longer need your data or you have objections to automated processing, you have the right to obtain the restriction of processing.

Right to object

You have the right to object to processing of your personal data from Thea Artemis on grounds relating to your particular situation, unless, among other reasons, if there are compelling and legitimate grounds for the processing which override your interests, rights and freedoms. You also have the right to object when a decision concerning you is based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you (the law provides exceptions which apply).

Right to data portability

You have the right to receive the data concerning you in a structured, commonly used and machine-readable format, as well as the right to transmit those data to another entity (controller), indicated by you to Thea Artemis.

Consent Withdrawn

If you have provided your consent with regard to specific collection, process and use of your personal data, you may withdraw that consent at any time. The previous mentioned withdrawn of consent applies only for the future.

The table below lists your rights per processing purpose and corresponding legal basis:

PURPOSE	LEGAL BASIS	RIGHTS (GDPR ARTICLES)						Withdrawal of consent (7.3)
		Access (15)	Rectification (16)	Erasure (17)	Restriction (18)	Portability (20)	Objection (21)	
Assessment of recruitment conditions	6.1b GDPR (take steps prior to contract)	X	X	X	X		X	
Inform you about future job opportunities	6.1a GDPR (consent)	X	X	X	X	X		X

You can find more information regarding your rights in the Hellenic Data Protection Authority's (HDP) website [here](#).

Rights Exercise

These rights shall be exercised free of charge for you by sending an e-mail to the Data Protection Officer (DPO) of Thea Artemis gpantazis@gini-group.com. In case, however, the aforementioned rights are exercised excessively and without good cause thus causing us administrative burden, we may charge you with a reasonable cost in accordance with the applicable legislation.

In case you exercise any of your rights, we will take all appropriate measures available for the satisfaction of your request within thirty (30) days – with the possibility of extension according to the applicable law- following the receipt of the relevant request. We may either inform you on the acceptance of your request or on any objective grounds that hinder the processing of your request.