

**AFS IT SERVICES ESTONIA OÜ**  
**RECRUITMENT CANDIDATE PRIVACY NOTICE**

Tallinn

**1. INTRODUCTION**

- 1.1. This privacy notice describes how the personal data of candidate(s) (hereinafter **Candidate**) are processed by AFS IT Services Estonia OÜ (hereinafter **Company**) as part of the recruitment process when a Candidate applies to the Company directly or through a recruitment platform or website or when a Candidate's data is provided to the Company through a recruitment service provider or if the Candidate is being referred by the Company's employee.
- 1.2. Personal data is any information relating to an identified or identifiable natural person (data subject), irrespective of the form of the personal data. The data controller with regard to the Candidate's personal data is AFS IT Services Estonia OÜ, registration code 14530871, address Telliskivi 60/2, , Tallinn 10412, Harju county, Estonia, belonging to the Bertelsmann group of companies.
- 1.3. The Company processes Candidate's personal data according to the applicable legislation concerning data protection (hereinafter also "applicable data protection legislation"), including the Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter GDPR) and the Personal Data Protection Act.
- 1.4. The Company implements appropriate organisational, IT-related and other necessary security measures to ensure the security of Candidate's personal data. The Company applies to the processing of personal data the security measures foreseen in the Company's internal procedures.

**2. PERSONAL DATA WE PROCESS**

- 2.1. The Company collects the following personal data of the Candidate:
  - 2.1.1. personal data (including name, ID code, date of birth, gender, data of identification document(s) and photo, address, citizenship, etc);
  - 2.1.2. data about the Candidate's education and training (level of education, institution, trainings, language skills);
  - 2.1.3. data on Candidate's references (it is the Candidate's obligation to obtain prior consent from the referees for providing such information);
  - 2.1.4. data on recruitment tests and interviews conducted with the Candidate;
  - 2.1.5. home/test assignments performed by the Candidate;
  - 2.1.6. information about previous Company(s);
  - 2.1.7. background check data to the extent allowed by applicable law (including valid criminal convictions, credit report based on publicly available data, and information

made public by the Candidate on the Internet that may be required for the legitimate interests of the Company).

- 2.1.8. contact details (including address, phone number, e-mail address, social media etc);
- 2.1.9. other data that the Candidate has provided voluntarily to the Company (e.g. Candidate's CV, reference letters) or that the Company has become aware of during the recruitment process.

### **3. PURPOSES FOR PROCESSING PERSONAL DATA**

- 3.1. The Company processes the personal data for the following purposes:
  - 3.1.1. communicating with the Candidate;
  - 3.1.2. verifying the Candidate's background and qualifications;
  - 3.1.3. the preparations to enter into an employment, service, authorisation or other contract concluded with the Candidate;
  - 3.1.4. compliance with legal obligations (including obligations arising from Employment Contracts Act, Law of Obligations Act, Health Insurance Act, Taxation Act, etc);
  - 3.1.5. the communication within the organisation.

### **4. LEGAL BASIS FOR PROCESSING PERSONAL DATA**

- 4.1. The legal basis for processing personal data for the purposes specified above may be:
  - 4.1.1. processing for the preparation or performance of the agreement between the Company and the Candidate;
  - 4.1.2. processing for fulfilling the Company's legal obligations;
  - 4.1.3. the Company's legitimate interest;
  - 4.1.4. processing for the establishment, exercise or defence of legal claims.

### **5. SHARING PERSONAL DATA**

- 5.1. In certain instances the Company may, to the extent permitted by applicable data protection legislation, transfer personal data to other Bertelsmann group companies, occupational health professionals, government agencies or other institutions or third-party service providers, e.g. the Social Insurance Board and accounting and legal service providers, for fulfilling the purposes described in section 3. The Company may also use recruitment service providers and recruitment platforms with whom some of the Candidate's data may be shared or who may process the data on the Company's behalf. The Company does this only in accordance with the applicable data protection legislation.
- 5.2. The recipients to whom the Candidate's personal data may be transferred are only the persons who need the personal data for fulfilling the purposes stated in section 3. Candidate's personal data may also be transferred to the Company's employees on a need-to-know basis.

## **6. TRANSFERS OUTSIDE THE EEA**

- 6.1. The Company transfers data outside of the European Economic Area (EEA, i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) only where it is compliant with the applicable data protection legislation and the means of transfer provides adequate safeguards in relation to the Candidate's data.

## **7. STORING PERSONAL DATA**

- 7.1. The Company retains the personal data of the Candidate until the purposes described in section 3 have been fulfilled or according to the statutory retention periods or as long as it is needed for possible future legal disputes between the Company and the Candidate.

## **8. CANDIDATES' RIGHTS**

- 8.1. According to the applicable data protection legislation, the Candidate as a data subject has the following rights, taking into account the statutory restrictions from applicable data protection legislation upon exercising these rights:
- 8.1.1. right to obtain information about the personal data processed about the Candidate;
  - 8.1.2. right to the rectification of personal data in case the data are incorrect;
  - 8.1.3. right to demand the erasure of personal data except when the Company can lawfully refuse such a request;
  - 8.1.4. right to demand the restriction of personal data processing;
  - 8.1.5. right to object to the processing of his/her personal data;
  - 8.1.6. right to data portability.
- 8.2. In order to exercise the rights described above or if the Candidate finds that his/her personal data has been unlawfully processed or if the Candidate has any other complaints, the Candidate may contact Company's Data Protection Coordinator (DPC) (e-mail: [afs-ee.dpc@arvato.com](mailto:afs-ee.dpc@arvato.com)). The Candidate also has the right to lodge a complaint with the competent data protection supervisory authority or file a claim with the court if the Candidate finds that his/her personal data has been processed unlawfully. The competent data protection supervisory authority in Estonia is the Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon, address Tatari 39, 10134 Tallinn; e-mail: [info@aki.ee](mailto:info@aki.ee) ; phone number: +372 627 4135; website: [www.aki.ee](http://www.aki.ee))

## **Recruitment Process Approval of Maintaining Personal Data**

Dear Candidate,

Thank you very much for applying for the vacant position at AFS IT Services Estonia OÜ (the **Company**). If during current recruitment process there will not be signed an employment contract between the Company and you as the Candidate, the Company would like to maintain all collected information during current recruitment process in Company's recruitment database.

The information AFS IT Services Estonia OÜ will maintain is mentioned in the Recruitment Privacy Notice clause 1.-8.

By submitting the application form you allow AFS IT Services Estonia OÜ (the Company) to maintain your information in the Company's recruitment database for the purpose of contacting you during future candidacies.