

# Candidate Privacy Notice

## TERMS OF USE

JustMarkets values your privacy and maintains an unwavering commitment to safeguarding your personal data. In the context of this notice, JustMarkets acts as a "data controller." This signifies our responsibility in determining the methods of retaining and utilizing personal information pertaining to you.

This privacy notice is pertinent to your situation as you are currently in the process of seeking employment with us, be it as an employee, worker, or contractor. It serves to acquaint you with the manner and purpose of utilizing your personal data, particularly concerning the recruitment procedure, as well as the typical duration for which this information will be stored. Additionally, it furnishes you with essential information in accordance with the stipulations of the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Please note that this privacy notice only applies to you as a job applicant if you reside in the EU.

## DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## TYPE OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The data you've shared in your CV.
- The information you've given us on our application form, includes your name, email, phone number, languages spoken, etc.
- Any skills assessment(s) you've completed as requested and submitted with your application if needed for the position.
- Any details you provide during an interview.

## **HOW WE WILL USE INFORMATION ABOUT YOU**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the job position for which you have applied.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Occasionally, for statistical and historical research purposes.

We will not use your data to send you personalized marketing materials or other communications that we believe might interest you without obtaining your explicit consent. For any marketing-related endeavours, we will request your explicit consent.

Having received your CV and, where required, the results from the competency test which you have taken, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and/or carry out a criminal record (only to the extent that it is necessary for that role and provided that it is permitted by law) and/or carry out any other check before confirming your appointment.

We might ask for some or all of the following info to help match you with suitable job or internship options: your name, contact details, education, work history, references, immigration status (if you need a work permit), your current pay details, pension and benefits information, insights into your career preferences, any additional details you choose to provide, and additional feedback from your references.

To keep things running smoothly, we'll need a bit of info from our workers and contractors. This includes contact details for relevant people in your organization so we can keep in touch. We may also need your bank details to pay for the services you provide if that's part of our agreement.

We have a legitimate interest in assessing your suitability for the relevant job role, as appointing the right candidate would be advantageous for our business.

## **NOT PROVIDING THE REQUESTED INFORMATION**

If you don't provide the information we need when requested – information that's essential for us to assess your application, like qualifications or work history – we won't be able to proceed with your application.

## **HOW IS YOUR PERSONAL DATA COLLECTED?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies, from which we collect your curriculum vitae.
- Your named referees, from whom we collect the following categories of data: employment letter from former employer(s), reference letter (if required).
- From publicly available sources such as LinkedIn or Facebook, we collect any information contained in your public account.

## **AUTOMATED DECISION-MAKING**

We do not use an automated decision-making system for the screening of candidate applications.

## **DATA SHARING**

We will exclusively share your personal information with any entity within our group (collectively referred to as the "JustMarkets group"), search consultancy firms, our software providers, and tax, audit, or relevant authorities for the sole purpose of processing your application. All our third-party service providers and other entities within the group are obligated to implement adequate security measures to safeguard your personal information in accordance with our policies.

## **DATA SECURITY**

We have implemented suitable security measures to prevent accidental loss, unauthorized use, access, alteration, or disclosure of your personal information. Additionally, we restrict access to your personal data to those employees, agents, contractors, and third parties who require it for legitimate business purposes. They will handle your personal information solely as instructed by us and are bound by confidentiality obligations. We have established procedures to address any suspected data security breaches and will inform you and the relevant authorities in the event of a suspected breach, as mandated by law.

## **DATA RETENTION**

In case your application is successful and you accept our offer, any personal data collected during your recruitment process will become part of your records and will be retained in accordance with specific country requirements and the privacy notice applicable to JustMarkets employees and staff members, provided during the onboarding process. We will store your personal information for a duration of 7 years after communicating our decision to not proceed with your application, in order to contact you for other relevant job opportunities potentially.

If you wish to be excluded from consideration for future job offerings, you can request the removal of your candidate profile by sending an email to: [support@justmarkets.com](mailto:support@justmarkets.com).

Upon receipt of a request to delete an individual's personal registration, JustMarkets will ensure that your personal record is deleted within 30 days. After this period, we will securely dispose of your personal data in line with our data retention policy, unless the law or other regulations mandate its preservation. In certain cases, we might anonymize your personal data (so it's no longer tied to you) for research or statistical purposes.

## **YOUR RIGHTS REGARDING PERSONAL INFORMATION**

Under specific circumstances, as per legal requirements, you possess the following rights concerning your personal information:

- **Access Request:** You can request access to your personal information (commonly referred to as a "data subject access request"). This enables you to obtain a copy of the personal data we have and verify its lawful processing.
- **Correction Request:** You can request the correction of any personal information we hold about you. This allows you to rectify any incomplete or inaccurate details we possess.
- **Erasure Request:** You can request the erasure of your personal information. This empowers you to ask for the deletion or removal of your data when there's no valid reason for us to continue processing it. You also have the right to request deletion when you've exercised your right to object to processing (see below).
- **Objection to Processing:** You can object to the processing of your personal information if we're relying on a legitimate interest (or that of a third party) and specific circumstances make you wish to object to processing on this basis. You also have the right to object if we're processing your data for direct marketing purposes.
- **Restriction Request:** You can request the restriction of processing of your personal information. This enables you to ask us to halt the processing of your data, especially if you want us to verify its accuracy or the purpose of processing.
- **Data Transfer Request:** If you desire to review, validate, amend, or request the removal of your personal information, object to the processing of your data, or ask us to transfer your personal information to another entity, you can get in touch with us at [support@justmarkets.com](mailto:support@justmarkets.com).

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint directly with our supervisory authority, the Office of the Commissioner for Personal Data Protection (the "Commissioner"). Further information is available on the Commissioner's website at <http://www.dataprotection.gov.cy>.