



**RECRUITMENT
DATA PROTECTION
&
PRIVACY POLICY**

SCORDIS, PAPAPETROU & CO

SCORDIS, PAPAPETROU & Co LLC
30, Karpenisi Street
Nicosia 1077, Cyprus

A. GENERAL

1. This Data Protection & Privacy Policy (hereinafter “**Privacy Policy**”) provides all necessary information as regards the collection and processing of Personal Data of individuals who have expressed their interest in being considered as recruitment candidates by the law firm **SCORDIS, PAPAPETROU & Co LLC** (HE 221102) or the licensed Corporate Services Provider **SCORDIS, PAPAPETROU & Co (Corporate Services) Limited** (HE 221102), both with registered office at 30 Karpenisiou Street, 1077 Nicosia, Cyprus (tel: +35722843000 / email: info@scordispapapetrou.com), collectively referred to as the “**Firm**”, “**SP**”, “**Group**” or “**SCORDIS, PAPAPETROU & Co**”.
2. The Firm is committed to safeguard the privacy of individuals applying for recruitment and process their Personal Data in a lawful and transparent manner per the requirements set out in the applicable legislation. Through this Privacy Policy and as required by applicable law, SP provides you, inter alia, with information on the following key areas:
 - i. The categories and type of Personal Data collected and processed and the purposes of such processing;
 - ii. The legal basis for the processing of Personal Data;
 - iii. The recipients or categories of recipients of Personal Data;
 - iv. The principles relating to the processing of Personal Data;
 - v. The Data Subjects’ rights under applicable legislation and information on how those rights can be exercised.
3. For the purposes of SP Privacy Policy:

“**Personal Data**” means any information relating to an individual that identifies the same, directly or indirectly, as further defined in the Regulation (hereinafter also “**Data**”);

“**Processing**” means any operation or set of operations, which is performed on personal data, as further defined below under section (C);

“**Data Controller**” means the person or organization which determines when, why and how to process Data;

“**Data Processor**” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

“**Data Subject**” means any identified or identifiable natural person about whom SP holds Personal Data;

B. Legal Framework

4. SP is subject to the provisions of the General Data Protection Regulation (EU) 2016/679 (hereinafter "**Regulation**") and any applicable data protection laws or regulations of the Republic of Cyprus, such as the Law on "*The Protection of Natural Persons Against Personal Data Processing and the Free Movement of Such Data*" of 2018 (hereinafter "**CyDPL**").

C. Data Processing

5. SP, acting as a Data Controller, shall, through its employees and/or managers and/or directors, collect, record, store, organize, structure, adapt or alter upon being informed of any change, retrieve, disclose by transmission or otherwise make available, align or combine, restrict, erase or destruct Personal Data. However, any type of Personal Data processing shall only take place in the framework of SP recruitment purposes and SP shall not perform any other type of processing of such Personal Data.

D. Type of Data

6. The type and nature of Personal Data processed by SP shall be limited only to those required for recruitment purposes and compliance with any applicable regulatory and/or legal requirements and obligations.
7. To this respect, the following categories of Personal Data are processed by SP for recruitment purposes as applicable depending on the position applied for:
 - i. Personal information, such as name and surname, gender, date and place of birth, nationality, residential address, marital and family status, salary, ability / license to operate vehicles, memberships to professional bodies, passport or ID number, contact details (telephone, email) of recruitment candidates and curriculum vitae including, amongst other, information pertaining to qualifications, academic credentials as well as educational and occupational background;

- ii. Personal information such as name and surname, gender, occupation and contract details (telephone, email) of recruitment candidates' references;

E. Children's Data

8. SP may collect information from recruitment candidates with regard to family status and names/ages of dependents. Such information, when concerning a child, will be deemed provided by the person(s) holding parental responsibility for the child per article 5 of Law 216/1990.

F. Closed Circuit Television (CCTV) Network

9. SP has established and operates a CCTV network in its Nicosia and Limassol premises for the purpose of protecting its legitimate interests, including the safety of its staff, its business and its premises as well as to protect the information it holds relating to its clients. Such CCTV network may capture images of recruitment candidates who are interviewed in SP offices. All information related to said CCTV network such as its way of operation and the legitimate interests pursued by SP are detailed in the SP CCTV policy.

G. Data Processing Principles

10. Data collection and processing is conducted in accordance with the principles laid down in the Regulation and the CyDPL, thus SP collects and processes Data in a lawful, fair and transparent way, solely for the purposes of fulfilling its recruitment needs. Furthermore, SP ensures that Data are processed with integrity and confidentiality, implementing appropriate technical and organizational measures for Data security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, such as applying customary data protection practices, including a variety of commercially available software and hardware security tools. However, despite such measures, security breaches may occur and no data transmitted over the Internet and no database or other depository of information can be totally secure.

11. In addition, SP takes reasonable steps to ensure that the processed Data are accurate and, where necessary, kept up to date. From time-to-time SP may request confirmation as regards Data accuracy, taking every reasonable step to ensure that Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay. Finally, SP will ensure that all collected Data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

H. Source of Data – Processing Purpose

12. SP obtains all Personal Data directly from the recruitment candidates, their professional references and academic / education organizations / institutions they have attended or professional bodies in which they are registered, their referees, as well as from open sources in the public domain.

13. The provision of Personal Data is required for SP to assess the recruitment candidates' fitness and probity for the respective position. Consequently, non-provision of the required Personal Data will render considering an application by a recruitment candidate impossible.

I. Lawful Basis for Processing

14. SP collects and processes Data **under article 6(1)(a) of the Regulation**, namely on the basis of each Data Subject's consent which can be freely withdrawn at any time in the same manner it was granted (i.e., through the same communication channel the candidate used to apply for employment with SP);

J. Data Storage and Retention Period

15. Data may be kept in paper (hard) copy or in digital form on servers or personal computers or backup devices (including on portable devices) on network or off site, including third party data storage facility(ies) or data center(s) (including cloud providers).

16. SP will retain recruitment candidates' data for a period of 1 (one) year for the purpose of inquiring on their availability in the event where a job vacancy occurs during such period, unless the Data Subject withdraws consent before lapse of the retention period. Should a recruitment application be successful then the Personal Data already shared as well as additional Personal Data will be processed in accordance with our SP Employee Privacy Policy.

K. Data Transfer - Recipients

17. In the usual course of data processing SP will not disclose, transmit or transfer recruitment candidates Personal Data to third parties nor engage Data Processors. Should disclosure, transmission or transfer become necessary it will be subject to the Data Subjects express consent, unless the same is mandatory for SP under applicable law.

L. Data Subjects' Rights

18. Per the provisions of the Regulation and the CyDPL and further to the of right information which is complied with by virtue of this Privacy Policy and any privacy notices addressed by SP to Data Subjects, the following rights provided by the Regulation are relevant with the processing of recruitment candidates Personal Data by SP, namely:

- i.** The right to withdraw consent, to the extend processing is executed on the basis of consent. It should be noted however that withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn whereas it will not render further processing unlawful if same is executed on any of the other lawful processing grounds provided by the Regulation.
- ii.** The right to request access to, or copies of their Personal Data, together with information regarding their processing;
- iii.** The right to request rectification of inaccurate Data (subject to the provision of satisfactory documentation, if applicable);
- iv.** The right to request, on legitimate grounds and where there is no good reason for SP continuing to process Data, their erasure;

- v. The right to lodge a complaint regarding the processing of Data. Data subjects can lodge complaints using the contact details provided below and if it is felt that respective concerns have not been adequately addressed, lodge a complaint with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus (respective information can be accessed at <http://www.dataprotection.gov.cy>).

19. Any questions or concerns relating to the processing of data by SP as well as respective inquiries can be addressed at SP Data Protection Officer by email at: dpo@scordispapapetrou.com or by letter at: The Business Forum, Karpenisiou 30, 1077 Nicosia, Cyprus.

M. Changes to this Privacy Policy

20. At any time SP may amend its Privacy Policy in which case it will notify data subjects about material changes. In any case, data subjects are encouraged to review this Privacy Policy periodically, so as to be always informed about how SP processes and protects their Data.