

# Job Applicants Privacy Notice of Foris Europe

Last Update: 14 January 2022

As a responsible company, Foris Europe is aware that it is very important to you to understand how we collect, store, share and use your personal data as job applicants. We are committed to ensuring that the personal data of our job applicants is handled in accordance with the principles set out in the applicable legislation.

This privacy notice tells you what to expect when Foris Europe collects personal information about you. It applies to our job applicants. However, the information we will process about you will vary depending on your personal circumstances. Foris Europe is the controller for this information unless this notice specifically states otherwise. You may contact us at: 16A G.M. Dimitrov Blvd., Bernard Iztok Tower, fl. 8, Izgrev Region, Sofia 1797.

Please review this privacy notice carefully before applying for a job with us having in mind that you should read it in conjunction with any other additional documents we may address to you. Please note that this privacy notice does not grant you any contractual rights, nor creates legal obligations for us. When appropriate we will provide a “just in time” notice to cover any additional processing activities not mentioned in this notice. For further questions, you may contact our Data Protection Officer at [dpo@crypto.com](mailto:dpo@crypto.com).

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## How do we get your information

We may get information about you from the following sources:

- directly from you;
- from recruitment agencies;
- from referees, either external or internal;
- your previous or current employers with the aim of obtaining recommendations or general feedback;
- public sources, such as professionally related social networks;
- CCTV images from our landlord or taken using our own CCTV systems.

## What personal data we process and why

This notice applies to any personal data concerning you, regardless of the form they are incorporated in – such as emails, hard copies of documents or electronic documents. The categories of personal data will depend on the stage of the recruitment process.

### Application stage

You may apply for a job with us:

- by using our online application system available on our website, where your details will be collected by on our behalf by a specialized service provider;
- by using an online application system available at a website of other specialized service providers, as the case may be;
- through a recruitment agency;
- through an internal referral.

At this stage we may process the following personal data concerning you:

- personal contact details such as your name, address, contact phone number and personal email addresses;
- your date of birth, gender, and photo (if attached);
- video and voice recordings (in case of a recorded video interview);
- your nationality and location;
- your employment and education history, including your previous experience and qualifications;
- employment references;
- right to work information;
- data contained in motivation letter (if attached or on additional request);
- data contained in certificates, diplomas, recommendations (if applied or on additional request);
- background verification information;
- information on the person who referred you;
- whether you agree that we retain the personal data provided by you for a longer period than the statutory one;
- other information you may provide us with.

Our recruitment team and hiring managers will have access to all this information.

## Assessments

We may ask you to attend an interview or more than one interview depending on the role you apply for. This process will involve one or more recruitment specialists and hiring managers reviewing the data provided by you. During the interviews, information about you will be generated by you and by us. For example, we may ask you additional questions in order to assess whether you are a suitable fit for the position and we might take notes. This information is held by us.

## Job offer

If you accept our offer, we will need some additional information from you in order to prepare the contractual documentation for your engagement:

- full name and date of birth (if we do not have this data already);
- unique identification number or National Revenue Agency Number;
- citizenship;
- permanent address and residual address, if any;
- highest level of completed educational degree;
- phone number (if we do not have this data already);
- personal email address used for registration at Crypto.com application (if we do not have this data already);
- address at Crypto.com application.

We may also request some data contained in paper copies of specific documents, including:

- medical certificate issued by general practitioner;
- recent bank statement showing IBAN and name issued by your bank;
- copy of your last obtained diploma confirming your degree, specialization, qualification, certification, scientific title or scientific degree, if such is required for the position you will occupy;
- your labor book;
- document showing National Revenue Agency Number;
- document evidencing the relevant length of service, if such is required for the position you will occupy.

By law we should require your identity document, but we will not make any copies of it – we will just check the necessary details and will deliver it back to you right away. We may also ask for additional documents if we are required to collect such by law (such as criminal record certificate or permission by the Labour Inspectorate).

You do not have to provide what we ask for, but it may affect your application if you don't.

We do not use your data for automated individual decision making, which means we do not take decisions about you by way of technological means and without personal participation.

## Lawful basis for processing your personal data

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. You may contact us if you need details about the specific legal basis we are relying on to process your personal data:

- processing is necessary to take steps at your request prior to entering into a contract (for instance, in order to administer your application);
- processing is necessary for compliance with a legal obligation to which we are subject (for instance, collecting of specific documents, including permissions by relevant authorities);
- processing is necessary for the purposes of the legitimate interests pursued by us as your potential employer or contracting entity and our interests do not contradict to your interests, fundamental rights or freedoms (for instance, the interest in assessing your suitability for a role you have applied for, organizing and conducting of interviews, selection of the most suitable candidates and hiring of those among them who have the necessary experience and skills for working with us, developing and improvement of our recruitment process, etc.).

We do not usually need your consent for processing personal data concerning you. This could be the case, for example, if you wish that your application details are kept for more than six months as of the completion of a recruitment procedure for a particular position which you applied for but were not selected, in order to take your application into account in future recruitment procedures. In any case we will ask for your consent and provide you with the respective information as required by law. You will have the right to withdraw your

consent at any time, but please note that this will not affect the lawfulness of processing based on your consent before its withdrawal.

## Special category of data

We may process information you provide as part of your job application which is special category data, such as health information, for the purposes of performing our rights and obligations as your employer or performing the rights you have under labor law and the law in the field of social security and social protection, and as far as it is permitted by the European and national legislation.

## What will we do with the information you give us?

We will use all the information you provide during the recruitment process to manage your application with a view to offering you a contract with us, to assess your suitability for the role and to fulfil legal requirements, if necessary.

We may use any feedback you provide about our recruitment process to develop and improve our future recruitment campaigns.

We will not share any of the information you provide with any third parties for marketing purposes.

## How long we keep your personal data

Our general approach is to keep your personal data for as long as necessary in order to meet the purpose for which they have been collected by us.

In most cases the period for which we will keep your data is provided by law. We process your personal data for a period of up to six months as of the closure of the respective recruitment procedure for the position you applied for unless you provided your consent for processing for a longer period.

If we requested originals or notary verified copies of documents certifying physical or mental capability, necessary qualification and experience and you are not selected to occupy the position, we will deliver these documents back to you no later than six months as of the final closure of the recruitment procedure, unless otherwise provided by law.

We may keep data concerning you contained in internal documents which we created in the recruitment process for three-year term after its closure in compliance with the Law on Protection Against Discrimination.

For more information you may contact us at [dpo@crypto.com](mailto:dpo@crypto.com).

## How we protect your personal data

We follow the necessary physical, technical and administrative security standards with the aim to protect your personal data from loss, misuse, alteration, destruction or damage, as required by law.

If you need more information on our security and privacy practices, we would be glad to give you more details – please contact us at [dpo@crypto.com](mailto:dpo@crypto.com). Do not forget that you also play a major role in the process of protection of your personal data and shall observe to whom you share your data and how you protect your communications and devices.

## Data sharing

In some circumstances, such as under a court order, we may disclose your personal data to specific categories of persons, entities, state bodies or other organizations. We may also share information about you with third parties including external auditors.

## Our service providers

We use service providers in order to facilitate the management of our business. Such may be, for example, lawyers or other legal advisors – in case of disputes or in regard to other legal procedures; experts – in order to comply with our obligations; other service providers, such as IT maintenance and platforms management or other services related to recruitment; other business partners.

Our service providers have access to your data and may use it only for the completion of the respective tasks assigned to them and based on our instructions.

## Companies from our corporate group

Since we are an international business, we may need to share your personal data within our corporate group.

## Data recipients upon reorganization and changes to our business

In case we are part of sale negotiations concerning our business or a part thereof, merging our business with other business, we are acquired by other business or we are subject to other kind of reorganization, we may have to share your personal data or a part thereof to the respective business or to its legal consultants as part of any due diligence process for the purposes of the analyzing of the proposed sale or reorganization. We may need to share your data to the reorganized business structure or to a third structure after the reorganization has been finalized.

## State bodies

If provided by law and upon compliance with the statutory provided procedure, we may share your personal data to the respective state bodies.

## Do we use any data processors

Yes - a list of our current data processors can be found at Annex A – Data Processors.

## Your rights in relation to this processing

As an individual you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with a supervisory authority. The supervisory authority competent for Bulgaria is the

[Personal Data Protection Commission](#). You may also seek a defense of legal claims before the competent court.

You may find more information on your rights [here](#).

## Transfers of personal data

We transfer staff personal data outside the European Economic Area and when this is necessary, we ensure that we have appropriate safeguards in place.

The European Commission has decided that some countries ensure an adequate level of protection of the personal data. Therefore, where we transfer personal data to such countries, no additional security measures are required.

In all other cases we apply appropriate measures and guarantees, such as standard contractual clauses for data protection. You may obtain a copy of these standard contractual clauses by contacting us at [dpo@crypto.com](mailto:dpo@crypto.com).

We share access to your personal data with our parent company – Foris Limited, which is located in Hong Kong. We do so because we are joint controllers regarding such data, which means that we jointly determine why and how we process the data. If you need more information in this respect, you may contact us at [dpo@crypto.com](mailto:dpo@crypto.com).

## Further information

### CCTV

We operate CCTV inside our premises to monitor access to certain areas of the office and to ensure security. Further information is available in our CCTV Notice.

Additionally, you may be filmed by CCTV which is owned and operated by the landlords or owners of the buildings in which our offices are situated. We are not the data controller for this information.

### Confidential references

In the course of the recruitment process we may give or receive references about you. We usually treat such references as confidential. Please note that the personal data included in such confidential reference may be exempt from the right of access.

### Annex A – Data Processors

Data processors are third parties who provide certain parts of our staff services for us. We have contracts in place with them and they cannot do anything with your personal information unless we have instructed them to do so. You may find below more specific information in this respect.

<b>Data Processor</b>	<b>Purpose</b>	<b>Privacy Notice</b>
Google	Storage and communications	Third party <a href="#">link</a>

Jobs.bg	Job applications management	Third party <a href="#">link</a>
LinkedIn	Professional social networking	Third party <a href="#">link</a>
Slack	Business communication	Third party <a href="#">link</a>
Workable	Recruitment management	Third party <a href="#">link</a>

Please note that where you apply for a job opening via the application function on a job site or similar online service provider, the relevant online service provider may retain your personal data and may also collect data in respect of the progress of your application. Any use by the relevant online service provider of your data will be in accordance with their privacy notice.

If you have any additional questions in this regard, please do not hesitate to contact our DPO Team at [dpo@crypto.com](mailto:dpo@crypto.com).