

RECRUITMENT PRIVACY NOTICE

This notice is being shared with you in order to describe how Adlook processes your personal data with regard to the recruitment process, as well as to follow transparency obligations arising from personal data laws, specifically Article 13 and/or 14 of the General Data Protection Regulation ('GDPR').

DATA CONTROLLER



The controller of your personal data collected and processed during the recruitment process is ADLOOK INTERNATIONAL LIMITED, a company incorporated and legally existing under the laws of the Republic of Cyprus, having its registered office at Kyriakou Matsi 18, 2nd Floor, Egkomi, Nicosia 2408, Cyprus, entered into the registrar of companies kept with the Ministry of Energy, Commerce, and Industry Department of Registrar of Companies and Intellectual Property (DRCIP) in Nicosia under registration number HE 470672, Tax ID: 60126624V,

hereinafter: "**we**", "**us**" or "**Adlook**".

CONTACT DETAILS



You can contact us in the following manner: (1) by mail at: Kyriakou Matsi 18, 2nd Floor, Egkomi, Nicosia 2408, Cyprus, (2) by e-mail: dpo@adlook.com, (3) or by telephone: +48 22 188 12 71.

CATEGORIES OF COLLECTED DATA AND PURPOSES FOR THE PROCESSING



We process the following categories of personal data:

- (a) the personal data you provided in your recruitment documents (recruitment form, CV, cover letter) such as identifiers as your first and last name, email address, any other contact details, professional qualifications, job history including names of previous employers, work dates and work locations, **for the purpose of carrying out the recruitment process for the position you are applying for** (on the basis of contractual obligations);

	(b) the personal data you provided in your recruitment documents (recruitment form, CV, cover letter) such as your first and last name, email address, any other contact details, professional qualifications, job history including names of previous employers, work dates and work locations, and during subsequent stages of the recruitment process (such as tests answers, solutions to assignments and results of reading comprehension tests or psychometric tests for the purpose of (1)(a) conduct the recruitment process for the position you are applying for and (b) in order to carry out future recruitment processes (subject to your specific consent), (2) conducting statistics for internal purposes, (3) improving our recruitment process, (4) measuring your satisfaction during the recruitment process through a survey, and (5) protecting our rights or defend claims related to the recruitment process, if needed (on the basis of our legitimate interest); (c) any additional personal data provided by you for the purpose of managing the recruitment process (on the basis of your consent); Your personal data will not be processed by automated decision-making or profiling.
LEGAL BASIS FOR THE PROCESSING 	The legal basis for processing your personal data, as indicated in the above row, is: (a) necessity to process your personal data in order to conclude a contract with you – to the extent that is necessary to conclude an agreement ("contractual obligations"); (b) legitimate interests pursued by the controller ("legitimate interest"), specifically the legitimate interest to (1) manage the recruitment process, (2) conduct statistics for internal purposes, (3) improve our recruitment process, (4) measure satisfaction during the recruitment process in a survey and (5) protect our rights or defend claims connected with the recruitment process, if needed; or (c) your consent ("consent"), (a) for the purpose of future recruitment processes, and (b) with respect to any additional personal data provided by you which is not required to take part in our recruitment process.

RECIPIENTS OF PERSONAL DATA 	Your data will be processed only by authorized Adlook staff. Your personal data may be disclosed to other companies of the Adlook corporate group. Additionally, your personal data will be transferred to data processors engaged by Adlook, i.e., services related to recruitment (such as those providing test solutions or IT systems for the recruitment process) and those providing storage and communication services (Google Cloud). These entities will process your personal data on the basis of the data processing agreements with Adlook and solely in accordance with the instructions of Adlook. In cases where it is necessary or required by law, we may also share your personal data with law enforcement agencies, supervisory authorities or in court proceedings.
TRANSFERS TO OTHER COUNTRIES 	Adlook may occasionally transfer your data to a country outside of the incorporation of Adlook, including outside the European Economic Area (EEA). In such cases, we will take measures to ensure the transfer is in compliance with applicable laws. Specifically, the transfer can be allowed if one of the following is applicable: • the country has been declared as offering an adequate level of protection through a European Commission adequacy decision; • Binding Corporate Rules (BCR) are in place (for inter-company transfers); • Standard Contractual Clauses (EU model-clauses) are used; or • the entity complies with the Data Privacy Framework.
RETENTION PERIOD 	Adlook will store your personal data for the duration of the recruitment process and for an additional 6 months thereafter (or 18 months if you have consented to be considered for future recruitment opportunities). Furthermore, if your personal data is processed based on consent, Adlook will delete it promptly upon its withdrawal, provided there is no other legal basis for further processing.

	If a dispute arises between you and Adlook, we will store your personal data until it is resolved (including enforcement of claims).
DATA SUBJECT'S RIGHTS  	You have the right to know about the data processing we conduct and what personal data we have about you. If your personal data is wrong or incorrect, you can tell us and we will fix it. Until that happens, you have the right to restrict the processing and it will be limited to storage only for that time. If you no longer wish to have your personal data processed you can also exercise your right to object or ask for its erasure. In certain situations we may still keep some of your personal data even after your request. This may happen due to the legal obligation imposed on us or in order to meet our business needs. If we process your personal data by automated means and on the basis of consent or of fulfilling a contract, you have a right to receive personal data that you have provided to us in a machine-readable format. You can also ask us to have this personal data transmitted directly from us to another controller, where technically feasible. When we process your data on the basis of consent, you have the right to withdraw it at any time. Withdrawal of consent does not affect the legality of the processing done up to that point. To know more about your data protection rights and how to exercise them you can contact our data protection officer at: dpo@adlook.com.
SOURCE OF PERSONAL DATA 	Your personal data we may have obtained so far (prior to contacting you) may originate from publicly accessible sources such as LinkedIn, other professional networking platform services, and other publicly available websites accessed by our suppliers, recruitment agencies, job boards, or from Adlook Associates who referred you for potential collaboration with us.

OBLIGATION TO DISCLOSE PERSONAL DATA 	For some data categories, you need to provide us with your personal data because it is necessary to enter into a contract with you. If you don't provide your personal data to us despite the above, you may face the following possible consequences: not being able to take part in the recruitment process conducted by Adlook. Providing your personal data is voluntary but necessary for the fulfillment of the purposes mentioned in this privacy notice. Without these data, we cannot perform the respective obligations.
RIGHT TO LODGE A COMPLAINT 	You have the right to file a complaint with the authority that oversees data protection for Adlook or for the country where you live. You can find the contact information for these authorities on this website.