

Effective date: 03<sup>rd</sup> of August, 2020

Last updated: 23<sup>rd</sup> of January, 2023

This privacy notice informs how Finci UAB (“we”, “our”, “us”) collects, uses and shares personal data of its employment candidates (“you”, “your”).

For the purposes related to the recruitment exercise we may collect and process your individually identifiable information, namely information that identifies a person or can, with reasonable efforts, identify a person (hereinafter – “**Personal data**”).

We respect your privacy, protect and process your Personal data in accordance with the rules of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter – “**GDPR**”) and other applicable laws and regulatory enactments.

We may change this privacy notice from time to time and update to keep in line with any government or legal changes, as well as company policies. You can always find the latest version of this notice on our website [www.finci.com](http://www.finci.com)

## 1. DETAILS OF THE CONTROLLER

The Controller of Personal data processing activities is Finci UAB, registration number: 304934066, registered office: Mėnulis g. 11-101, Vilnius, Lithuania, LT-04326.

You can contact us by phone: **+370 679 938 84** or by writing to the following e-mail address: [info@finci.com](mailto:info@finci.com).

## 2. CONTACT DETAILS FOR COMMUNICATION ON PERSONAL DATA PROTECTION ISSUES

If you have any questions relating to this Privacy policy or processing of your Personal data, you may contact us by using the communication channels listed in the previous paragraph (paragraph 1) or by contacting our Personal data protection officer by writing to the following e-mail address: [dpo@finci.com](mailto:dpo@finci.com).

## 3. 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.
- Maintained only for as long as necessary for the purposes we have told you about.
- Kept securely and protected against unauthorized or unlawful processing and against loss or destruction using appropriate technical and organizational measures.

#### **4. THE KIND OF DATA WE HOLD ABOUT YOU**

In connection with recruitment exercise, we will collect, use and store the following categories of Personal data about you:

- The data you have provided to us in your curriculum vitae (CV) and the Personal data contained in your covering letter (if applicable). This data can include: name, title, home/term address, telephone number, personal email address, date of birth, gender, employment history, qualifications, social media accounts, profession, professional memberships, educational achievements, diplomas, certificates, transcripts, languages, computer skills, national service completion.
- The data received from the feedback provided by respective referees (upon your consent).
- The data received from publicly accessible professional sources, for example such as LinkedIn, where we collect data included on your profile.
- The data you have provided us during interviews at our premises.

Please note, that for recruitment purposes we do not demand you to send us copies of your identification documents, diplomas and/or other professional qualification certificates. However, we may ask you to provide/show us these documents during the recruitment process.

#### **5. SENSITIVE PERSONAL DATA**

Normally, we are not processing sensitive Personal data or special categories of Personal data for recruitment purposes. However, there might be occasions when such data may become known to us within the process of your recruitment. If so, we will use your sensitive personal data only if we are permitted by the law to do so, for instance:

- We might use data about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We might use data about your nationality or ethnicity, to assess whether a work permit and a visa will be necessary for the role.

#### **6. THE PURPOSE OF PERSONAL DATA PROCESSING**

Your Personal data is processed only for the purposes of the recruitment process.

#### **7. LEGAL BASES FOR PERSONAL DATA PROCESSING**

The main legal bases to be used for processing of employment candidate Personal data are:

- your consent (point (a) of the first paragraph of Article 6 of the GDPR), as regards the fact that the CV is submitted and the retaining of the CV for subsequent vacancies;
- conclusion of a contract with data subjects (point (b) of the first paragraph of Article 6 of the GDPR) concerning the processing of data of candidates regarding whom a decision to conclude an Employment agreement/other mutual contract has been taken;
- the fulfilment of legal obligations (point (c) of the first paragraph of Article 6 of the GDPR), in individual cases on individual types of data, where regulatory enactments lay down minimum requirements for a specific position; or (point (b) of the second paragraph of Article 9 of the GDPR) in cases when we are processing your sensitive data;
- the legitimate interests of the Controller (point (f) of the first paragraph of Article 6 of the GDPR), as regards to contact the relevant candidate and/or the provision of evidence, in the case of alleged claims, as well as the amount of information to be requested at a minimum.

## **8. HOW WE WILL USE DATA ABOUT YOU**

We will use the Personal data we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- 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.

## **9. PERSONAL DATA RECIPIENTS**

Your Personal data will be shared internally for the purposes of the recruitment exercise. This includes members of the relevant HR department and interviewers involved in the recruitment process as well as IT staff if access to the data is necessary for the performance of their roles. Your personal data might be shared to the following third parties for the purposes of processing your application: external HR companies. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

## **10. INTERNATIONAL TRANSFERS**

We do not transfer your Personal data to countries outside the European Union or the European Economic Area.

## **11. AUTOMATED DECISION- MAKING?**

We do not use your Personal data to make automated decisions.

## **12. DATA STORAGE AND RETENTION**

Your Personal data will be stored on our secure server by means of appropriate technical and organizational measures. We will retain your Personal data for a period of 1 (one) year upon your explicit consent. We retain your Personal data for that period so that we can show, in the event of a legal claim, that we have not discriminated against employment candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. We further retain such Personal data in case a similar role becomes vacant for which you will be a fitting candidate. After this period, we will securely destroy your Personal data in accordance with our data retention policy.

## **13. VIDEO SURVEILLANCE**

With the purpose of the prevention or detection of criminal offences related to the protection of property and the protection of vital human interests, we carry out the video surveillance at our premises. Data retrieved by video surveillance is retained in the video archives for not more than 30 days, and is erased afterwards, except for in the cases when a security incident has occurred. If a security incident has occurred, the video surveillance data is retained till the completion of the security incident investigation.

## **14. YOUR RIGHTS**

### **Restoring your Personal data**

If there are changes to Personal data that you have provided to us, please contact us via e-mail [info@finci.com](mailto:info@finci.com) and provide us with the relevant data so that we can achieve the relevant Personal data processing purposes.

### **Your right to access and correct your Personal data**

In accordance with the provisions of the GDPR, you have the right to require us to have access to your Personal data at our disposal, to request their rectification, erasure, processing limitation, to object to the processing of your Personal data, as well as the right to data portability in the cases and procedures set out in the GDPR.

We respect your right to access and control your Personal data, so if we receive your request, we will respond to it within the time limits laid down in the regulatory framework (usually not later than one month if there is no specific request that takes longer to prepare the answer), and if it is possible, we will correct or delete your Personal data accordingly, or undertake the necessary measures to enable your Personal data portability as possible.

### **You may obtain information about your Personal data or exercise other rights as a data subject in one of the following ways:**

- by submitting an appropriate application in person and identifying yourself at our office at the address: Mėnūlio g. 11-101, Vilnius 04326, Lithuania, each working day from 10-17;
- by submitting an appropriate application to us by post to the following address: Mėnūlio g. 11-101, Vilnius 04326, Lithuania;
- by submitting an appropriate application to us by e-mail: [info@finci.com](mailto:info@finci.com); it is recommended that you sign it with a secure electronic signature when submitting a relevant application, sending it via e-mail.
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Upon receipt of your submission, we will evaluate the content and the possibility of identifying you, and, depending on the situation, we reserve the possibility of asking you to further identify yourself in order to ensure the security and disclosure of your Personal data to the person concerned.

### **Withdrawal of consent**

If the processing of your Personal data is based on your consent, you have the right to withdraw it at any time and we will no longer process your Personal data processed on the basis of your consent. However, please be informed that the withdrawal of consent cannot affect the processing of Personal data which is necessary for the fulfilment of the requirements of law/regulatory enactments or which is based on a contract, our legitimate interests or other legal basis for the lawful processing of Personal data provided for in GDPR.

## **15. COMPLAINTS**

If you have any questions or concerns regarding our processing of your Personal data, we encourage you to contact us first.

If, however, you believe that we have not been able to resolve the issue with each other and you believe that we are nevertheless in violation of your right to the protection of Personal data, you have the right to lodge a complaint with the Lithuanian State Data Protection Inspectorate (<https://vdai.lrv.lt/en/>).