

# PRIVACY NOTICE (JOB APPLICANTS)

In accordance with the Regulation<sup>1</sup> and the Act on Personal Data Protection,<sup>2</sup> the controller SLOVNAFT, a. s., Vlčie hrdlo 1, 824 12 Bratislava, Identification No. : 31 322 832, registered in the Commercial Register of the District Court Bratislava I, Section: Sa, Insert No.: 426/B (hereinafter only referred to as “the Company” or “the Controller”) processes your personal data for the purpose of carrying out future employment relationships.

For the purposes of this Privacy notice, job applicant means each person who was registered for the process of recruitment of suitable job applicants announced by the Company, or directly at the Company (without any announced recruitment process) in written or electronic form, through one of the advertisement portals, or via e-mail, through various selection programmes (e.g. GROWWW, etc.), via REFERRAL application, upon recommendation by any of the employees of the Company, but in particular through TALEO application which has been primarily designed for administration of job offers and selection of a suitable applicant. This Privacy notice explains how we shall use your personal data obtained directly from you in the course of selection of a suitable applicant until completion of the process.

You are a **data subject** in the course of processing of personal data by the Controller, which means that you are the person to whom processed personal data relate.

Dear applicant,

your personal data are processed by the Company in order to ensure carrying out of future employment relationships. The Company only processes your personal data on a legal basis (authorization to process personal data) which results from the Regulation, the Act on Personal Data Protection or any special legal regulation (e.g. the Labour Code).

As a Controller, we have a statutory obligation to provide your personal data in the course of inspection, supervisory activity or upon request by authorized governmental bodies or institutions, if so prescribed by special regulation.<sup>3</sup>

We may share your personal data with third persons who act on our behalf, for example with suppliers of certain services to our Company - processors (e.g. a contractual security service, etc.). In such cases, these third persons may use your personal data only for described purposes and only as per our instructions, based on a contract on personal data processing.

Your personal data shall be stored in a secure manner, in compliance with the Controller's and processor's security policy and only for the period necessary to fulfil the purpose of processing. Your personal data shall be only accessible to persons entrusted by the Controller with personal data processing who process such data upon instructions issued by the Controller and in compliance with the Controller's security policy.

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<sup>1</sup> 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).

<sup>2</sup> Act No. 18/2018 Coll. on Personal Data Protection and on amendment and supplementation of certain acts.

<sup>3</sup> For example Act No. 171/1993 Coll. on Police Force as amended; Act No. 18/2018 Coll. on Personal Data Protection and on amendment and supplementation of certain acts.

Your personal data are not subject to automated decision-making, including profiling. We do not publish your personal data or transfer them to third countries or international organizations.

## **STORAGE OF PERSONAL DATA**

Your personal data are backed up in compliance with the Controller's retention rules. Your personal data shall be fully deleted from back-up data storage site as soon as possible in accordance with the retention rules. The purpose of personal data stored at back-up data storage sites is to prevent security incidents, in particular impaired data availability due to a security incident. The Company is obliged to ensure data back-up in compliance with the security requirements in the Regulation and the Act on Personal Data Protection.

We only store your personal data for limited time, and they shall be deleted when no longer necessary for the purposes of processing as defined in this Privacy notice. It means that we keep your data for 1 year from the completion of selection procedure to find a suitable applicant. If you become our employee, you will be informed of further processing of your personal data in an appropriate manner, before your employment starts. We may process your personal data for a longer period after completion of the selection process in case of exercising legal claims of the Company.

## **PURPOSES OF PROCESSING**

- ✚ The Company processes your personal data for the purpose of selecting a suitable applicant, based on a legal basis consisting of contractual and pre-contractual relationship to which you as a data subject are a party, in connection with the Labour Code (Article 6(1) letter (b) of the Regulation). Failure to provide personal data necessary to selection of a suitable applicant may result in non-selection, impossibility to assess skills and qualities of the applicant.  
In case of successful selection, your personal data shall be processed further, according to the principle of compatibility of purposes, for the purpose of realization of employment relationship.
- ✚ If you are applying for the job upon recommendation by any employee of the Company, we obtain your personal data in particular via REFERRAL application, based on consent with provision of personal data to the Company which you have granted to that employee of the Company in order to be approached with a job offer. It is a legitimate interest of the Company to process your personal data relating to the information that we have employed you and that you have stayed at work for 3 and/or 6 months. The legitimate interest consists in development of the Company staff policy, improvement of quality of services provided to employees in the form of a benefit for recruitment of a new colleague.
- ✚ We obtain your personal data in particular via TALEO application in which you register based on provision of consent with personal data processing (Article 6(1) letter (a) of the Regulation). You are granting your consent with personal data processing to the company MOL Nyrt., which is affiliated with the Company within a group of companies.
- ✚ With relation to personal data processed via TALEO application, the Company only becomes the Controller after you respond to a particular job offer/pre-contractual relationship.

The Company shall also inform you with regard to processing of your personal data for the purposes of security of the Company's facility and health and safety at work prior to entering the Company's premises.

For the purposes of selecting a suitable applicant, the Company may also process a special categories of your personal data (data regarding health capability for work/health status).

## **YOUR RIGHTS PURSUANT TO THE REGULATION AND THE ACT ON PERSONAL DATA PROTECTION**

### **Right to access**

You have the right to access your personal data and obtain confirmation as to whether or not personal data concerning you are being processed. Where your personal data are processed, you have the right to information within the scope of these principles and the right to access your personal data. You have the right to obtain a copy of personal data we hold about you, as well as to information on how we use your personal data. In most cases, you will receive your personal data in the form of a written document, unless you require another method of their provision. If you have requested provision of this information electronically, you will receive it electronically, if technically feasible. If you repeatedly request provision of your personal data in the same extent, the Controller may charge a reasonable fee corresponding to administrative costs.

### **Right to rectification**

You have the right to rectify personal data processed about you, in case they are incorrect or inaccurate. It is very important for the Company to have correct information about you. Therefore, if you find out that any information which the Company holds about you is inaccurate or incomplete, notify the Company and request rectification of your data (e.g. change of the place of residence, change of contact, change of surname in case of marriage, etc.). The Company shall then correct/supplement such data without undue delay.

### **Right to erasure (right “to be forgotten”)**

You have the right to request erasure of your personal data for example in cases when personal data that we have obtained about you are no longer necessary to meet the original purpose of processing. However, your right has to be assessed in view of all relevant circumstances. For example, we may have certain legal and regulatory obligations which means that we will not be able to satisfy your request.

### **Right to restriction of processing**

If your request rectification of your personal data or object to erasure of your personal data, provided their processing is unlawful, or if the Company no longer needs your personal data for its purposes, but you may need them to prove or defend your legal claims, or if you have objected to processing of your personal data for other reasons, the Company shall restrict processing of your personal data for the period during which it will be possible to settle the matter.

### **Right to object**

If you think that the Company is not entitled to process your personal data, or if you wish to have an automated decision-making reviewed, you may object to processing of your data. In

such cases, the Company may continue processing your data only if it can prove that it has convincing legitimate reasons that outweigh your interests, rights and freedoms. However, the Company may always process your data if it is necessary in order to determine, exercise or defend any legal claims.

### **Right to portability of data**

You have the right to obtain and ask the Company for transfer of personal data which you have provided to us, to a third person, in a structured, commonly used and machine-readable format. However, the right to obtaining and portability of personal data only relates to personal data which we have obtained from you based on consent or contract to which you are a party.

### **Right to withdraw consent**

In majority of cases, we do not process your personal data based on your consent. However, it may happen that we shall request your consent in specific cases. When we do so, you will have the right to withdraw your consent with further use of your personal data. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

### **Right to lodge a complaint**

If you want to lodge a complaint regarding the way in which your personal data are processing, including exercising the rights above, you may contact our Data Protection Officer. All your suggestions and complaints will be carefully examined.

If you are not satisfied with our response or think that we process your personal data unfair or unlawful, you may file a complaint with the supervisory authority, namely the Office for Personal Data Protection of the Slovak Republic; <https://dataprotection.gov.sk>; Hraničná 12, 820 07 Bratislava 27; phone: +421/2/3231 3214; E-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk).

## **DATA PROTECTION OFFICER**

Safe processing of personal data and compliance of processing with the Regulation and Act on Personal Data Protection are supervised by the Data Protection Officer who you can approach when you want to exercise your rights.

**Contact details of the Data Protection Officer:** Entry Net, s.r.o.

E- mail: [zodpovednaosobagdpr@slovnaft.sk](mailto:zodpovednaosobagdpr@slovnaft.sk)

Address for correspondence: Data Protection Officer GDPR, SLOVNAFT, a.s., Vlčie hrdlo 1, 824 12 Bratislava

In case of any questions regarding processing of your personal data, please do not hesitate to contact us through our Data Protection Officer.