**PRIVACY NOTICE FOR JOB APPLICANTS**

*Last update: January 2025*

1. **OVERVIEW**

AstroBank Public Company Limited (**“we,” “our” “us” or “the Bank”)** is committed to protecting and respecting your privacy and your rights. We process your personal information in accordance with the applicable legal and regulatory framework, including the Law on the Protection of Physical Persons Against Personal Data Processing and the Free Movement of Such Data of 2018 (L. 125(I)/2018), as amended from time to time, and the General Data Protection Regulation 2016/679 (“**GDPR”**).

This notice (referred to as the “**Privacy Notice**”) **is directed to physical persons who have applied for a vacancy or internship program with the Bank or have shared their Curriculum Vitae (CV) with the Bank (the “Applicants”)** and provides an overview of how and why the Bank processes their personal data, as well as of their rights, during the recruitment process.

For the purposes of the present Privacy Notice, the terms “**personal data**”, “**data**” and “**personal information**” are used to refer to any information relating to you that identifies or may identify you, either directly or indirectly, such as your name, contact details, identification data (e.g. identity card/passport number, professional qualification and educational data ) and authentication data (e.g. your signature). Moreover, the term “**Processing**” (as defined in the GDPR) is used herein to collectively refer to actions such as the collection, retention, use, disclosure, transfer, deletion or destruction of personal data.

Please read the following carefully in order to understand our policies and practices regarding your personal data and how such data is processed by the Bank.

1. **WHO WE ARE AND OUR CONTACT DETAILS**

The Bank is a licensed credit institution incorporated and established in accordance with the laws and regulations of the Republic of Cyprus, with registration no. HE189515, and with registered address and/or headquarters at 1 Spyrou Kyprianou Avenue, 1065 Nicosia, P.O.Box 25700, 1393 Nicosia, telephone number 22575500. The Bank is acting as “**Controller**” (as defined in the GDPR) with respect to the data of the Applicants in the course of the recruitment process.

1. **SOURCES OF PERSONAL DATA**

As a general rule, the Bank collects your personal data directly from you (e.g. via application forms, certificates and other documentation that you furnish us with and any correspondence we may exchange). To some extent, your personal data may also be received indirectly from you (e.g. through monitoring mechanisms, as below).

Your personal information may also be received by the Bank via:

* Third parties (e.g. recruitment agencies; educational/professional institutions you have attended; referees which you have provided);
* Publicly available sources (e.g. public registries maintained by public and/or regulatory and/or supervisory authorities; the media, the press and the internet); and
* From other sources, where permitted or required by applicable law or regulatory requirements, for example for compliance with Anti-Money Laundering requirements;
1. **WHAT KIND OF PERSONAL DATA WE PROCESS**
2. **When you apply for a vacancy directly through the Bank, or through a third party such as a recruitment agency**, we will collect and further process personal data concerning you, including data contained in the following:
* Application forms, supporting documentation (such as CVs and certificates requested by us and/or provided by you) and relevant correspondence and/or communications with you or the third party (where applicable); Such data may include:
	+ personal identification data including name and surname, identification numbers, date of birth, gender,
	+ contact information including home and current work address, personal email address, telephone numbers
	+ nationality, visa and work permit (if applicable), work history, positions held, professional/ academic and other qualifications and memberships, diplomas and transcripts, computer skills, grades, languages, preferences, completion of national service (if applicable)
* References and other relevant information provided by and given to us by your referees and/or previous employers;
* Interview notes and other information concerning yourself, generated internally during the recruitment process;
* Publicly available social media profiles and other publicly available information, to the extent that such information is business-related and the review thereof is necessary to assess certain risks relating to the position applied for, including World-check background checks, credit and bankruptcy checks (in case of offer as applicable);
* Special categories of sensitive personal data including Medical examination report regarding your working capacity or health grounds for the position applied for, as well as your national origin in order to assess whether a work permit or a visa is needed, only in cases an offer is made to the applicant.
* Any other additional information that you may provide to us in support of your application including a ‘Clean Criminal Record Certificate’. Such information is treated as sensitive personal data and processed by the bank based on legal obligation and/ or based on the legitimate interest of the Bank to safeguard its interests and the interests of its customers by following measures to verify the integrity of its prospective employees during recruitment.
1. **WHY WE PROCESS YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS**

The Bank collects and further processes your personal information only where and to the extent necessary for specific purposes and as required and/or permitted by the applicable legal framework, primarily as follows:

For the performance of prospective contractual obligations

We collect and further process data which is necessary for the purposes of fulfilling our obligations under the prospective employment contract and Trade Union Collective agreements, at your request, prior to entering into an employment contract with us.

For compliance with our legal obligations

As your prospective employer and as a financial institution, we are obliged to process your personal data in order to comply with our legal obligations under the applicable laws and regulations, e.g. under the applicable employment, social security, social protection, and tax laws; reporting obligations (e.g. to the Central Bank of Cyprus and law enforcement authorities) and for compliance with Court judgments and/or orders.

On the basis of your consent

Insofar as you have granted us explicit and specific consent to the processing of your personal data for specific purposes other than the ones described above, the lawfulness of such processing is based on your consent. You have the right to withdraw your consent at any time. However, the right to withdraw consent is not retroactive and therefore a withdrawal of your consent shall not affect the lawfulness of any processing performed, based on this consent before its withdrawal.

For safeguarding legitimate interests

Where necessary, we collect and manage data for safeguarding legitimate interests pursued by us or by other parties, in compliance with the applicable personal data legal framework. Data and/or information are processed under this ground for reasons pertaining to business and/or commercial interests, taking into consideration the necessity of such action and your interests, fundamental rights and freedoms, as well as your reasonable expectations.

Non-exhaustive examples of such processing include background checks and security vetting in recruitment and HR functions;

Where the Bank processes your personal data based on legitimate interest, you have the right to object at any time to such processing. In such case, the Bank shall no longer process your Personal Data unless it demonstrates compelling legitimate grounds for the Processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Kindly be advised that any such objection is not retroactive and therefore any such objection shall not affect the lawfulness of any processing performed, based on this objection prior to its notification.

For public interest or in the exercise of official authority

Where necessary, we process data for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Bank.

1. **SPECIAL PROVISIONS FOR MONITORING PROCEDURES**

During the recruitment process with the Bank, your personal information is collected and further processed through the Bank’s monitoring procedures, as follows:

Video surveillance (CCTVs)

The Bank maintains video surveillance (CCTVs) of premises for the protection of employees and third parties; to protect against criminal acts such as assault and attack against, *inter alia*, the Bank’s employees, as well as theft, trespass, vandalism and damage to the Bank’s property; and to ensure the efficient running of the Bank. Where and to the extent necessary, personal data collected by video surveillance may be used for the purposes of pursuing and/or defending claims in internal and/or judicial and/or regulatory procedures.

Access control systems

The Bank employs access control systems in order to secure premises and/or data against unauthorised access, loss or theft. Records created and maintained by such systems are only reviewed where, and to the extent, necessary for the aforesaid purposes.

1. **SPECIAL PROVISIONS REGARDING “SENSITIVE” DATA**

Where and to the extent necessary, we process information regarding your health (such as information and medical certificates and/or reports that you provide to us) for reasons such as the following, as appropriate:

* to determine suitability for employment;
* to perform our equal opportunities policy;
* to process requests for alternative working arrangements (such as working remotely);
* to protect your vital interests;
* to comply with our obligations pursuant to the employment, social security and social protection legal framework or collective agreements;
* for the establishment, exercise or defence of legal claims;

The Bank will only request, collect and further process personal data relating to criminal convictions and offences where, and to the extent necessary, the processing of such data is required and/or authorized by law (e.g. pursuant to the Central Bank of Cyprus Directive to Credit Institutions on the Assessment of the Fitness and Probity of the Members of the Management Body and Managers of Authorized Credit Institutions, as amended and/or replaced from time to time).

1. **WHO RECEIVES YOUR PERSONAL DATA**

Within the Bank, your personal information is only processed by the involved to the recruitment process departments and/or persons that are authorised to process them, given that it is necessary to do so for the fulfillment of our contractual, legal and regulatory obligations, or where you have given us your consent to process them, or where we believe that it is necessary for our legitimate interests to do so, as explained by section 5 above.

Your data may also be processed by various service providers and agents engaged by the Bank to assist in the recruitment process, with whom we have contractual agreements, pursuant to which they are bound by the confidentiality and data protection obligations according to the applicable data protection legal framework.

We may also disclose your personal information to other individuals and/or entities for any of the reasons described above, where and to the extent we are legally obligated or authorised to do so, or where you have given us your explicit consent, or where we believe that it is necessary for our legitimate interests to do so, as explained by section 5 above.

Under the aforementioned conditions, recipients of your personal data may include:

* External advisors in cases where a legal claim or issue arises in relation to the recruitment process of a specific Applicant;
* File storage, archiving, records management companies and cloud storage companies;
* Clients, associates and other entities that the Bank has a business/contractual relationship with, or is taking steps to enter into such a relationship;
* Your own legal representatives/agents;
1. **RETENTION PERIOD**

Where you apply for a position with us, we will normally retain your personal information **for a maximum period of 6 months** after your application is rejected by us or an offer of employment is declined by you, for the purposes of future references should the position applied for and/or a similar one becomes available during that time period. You have the right to object to such retention of your personal data, in which case we will delete and/or destroy and/or anonymize it. However, we may retain such personal information for longer if necessary due to any pending legal proceedings and/or investigations by public authorities/bodies and/or other disputes/differences in relation to such. If you wish to be considered for employment after this period, you will have to submit a new application and related data.

Data processed through monitoring mechanisms

Data collected via the monitoring mechanisms specified in section 6, herein above, will only be retained for as long as necessary for the purpose they were originally collected, as above, and will be deleted and/or destroyed or anonymised at regular intervals, as appropriate, unless further retention is necessary for:

* investigating particular incidents and/or concerns regarding, for example, the security, confidentiality and integrity of such data; and/or the functioning of; or security threats against the Bank’s property (including any electronic programs and devices); and/or compliance with legal and regulatory obligations;
* the purposes of pursuing and/or defending claims in internal and/or judicial and/or regulatory procedures.

The Bank may also keep Personal Data for a longer period for research or statistical purposes. In such cases, the Bank will make sure that the relevant persons’ Personal Data is protected and only be used for this purpose.

1. **WHETHER WE CARRY OUT AUTOMATED DECISION MAKING (INCLUDING PROFILING)**

The Bank does not make decisions solely on the basis of automated processing (including Profiling as defined in the GDPR).

1. **WHETHER YOU HAVE AN OBLIGATION TO PROVIDE US WITH YOUR PERSONAL DATA**

Where you apply for a position with us, we will request that you provide us with your personal information in order to assess your suitability for the position applied for and in light of the legal and/or regulatory obligations we are under (e.g. pursuant to the Central Bank of Cyprus Directive to Credit Institutions on the Assessment of the Fitness and Probity of the Members of the Management Body and Managers of Authorized Credit Institutions, as amended and/or replaced from time to time). The provision of such personal information is a requirement for the evaluation of your application.

In case you do not provide the legally required Personal Data, then the Bank will not be allowed and/ or able to assess your employment application(s).

Where you enter into a business/contractual relationship with us, we require certain data in order to comply with our obligations under the applicable legal framework, collective agreements and your contract, as described in section 7 above. Where we process your personal data on the basis of our legitimate interests or your consent, you have the right to object to such processing or withdraw consent, as described in section 12 below.

1. **YOUR PERSONAL DATA RIGHTS**

We respect the rights you have under the personal data legal framework, namely the following:

* Right of access

You have the right to be aware of the categories of your personal data that the Bank maintains and process and access to such data and further information in relation to them.

* Right of rectification

You have the right to request and to obtain from us rectification of inaccurate personal information concerning you.

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

You have the right to request us to erase your data, where one of the following applies:

* Where such data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
* Where we process such data on the basis of your consent and you refuse or withdraw such consent, provided that no other legal ground for processing applies;
* Where we process your personal information in order to pursue our legitimate interests and you object to such processing, provided that no overriding legitimate grounds for the processing apply;
* Where such personal data have been unlawfully processed;
* Where such personal data have to be erased in compliance with a legal obligation of the Bank.
* Right to restriction of processing

You have the right to obtain from us the restriction of processing of data concerning you, where one of the following applies:

* Where you contest the accuracy of such data, for a period that allows us to verify the accuracy of such data;
* Where the processing is unlawful and you oppose the erasure of such data, requesting restriction of their use instead;
* Where we no longer need to process such data, but you require their retention for the establishment, exercise or defense of legal claims;
* Where you have objected to us processing your personal information on the grounds of our legitimate interests, until we verify whether the grounds on which we process such data override your rights and freedoms.
* Right to object to processing

You have the right to object, at any time, on grounds relating to your particular situation, to us processing your personal data on the basis of our legitimate interests. Should you exercise this right, we will no longer process such data unless we are able to demonstrate compelling legitimate grounds for the processing.

* Right to withdraw consent

Where you provided your consent for processing your information for specific purposes, you have the right to withdraw such consent at any time. Any such revocation shall only have effect after it is submitted and filed by us and will not affect the lawfulness of data processed prior to such revocation.

* Right to portability

You have the right to receive a copy of the personal data that you have provided to us and to transmit those data to another organization and/or to request that we transmit such data directly to another organisation, provided that:

* we process such personal information on the basis of (a) your consent, or (b) for the performance of our contractual obligations, or (c) at your request, for the purposes of you entering into a contractual relationship with us; and
* the relevant processing activities are carried out by automated means.
* Right to lodge a complaint

You may contact our **Data Protection Officer (DPO)** for any matters arising out of and/or in connection with this Privacy Notice, including for the purposes of exercising of your rights, at:

AstroBank Public Company Limited

Data Protection Officer

1, Spyrou Kyprianou Avenue, 1065, Nicosia

P.O Box: 25700, 1393, Nicosia, Cyprus

Tel. Number: 22366018

Email: dpo@astrobank.com

Additionally, the exercise of your rights may be done by submitting a request to CYHumanResourceServices@astrobank.com, which will in turn liaise with the DPO to respond/fulfill your request.

If you are not satisfied or still concerned about any personal data-related matters, you are entitled to file a complaint with the Office of the Personal Data Commissioner, as explained on the latter’s website.

1. **DATA SECURITY**

We have put in place and implement security policies and procedures to safeguard and to provide reasonable protection of your personal data against loss, misuse, unauthorized access, disclosure and alteration. Such measures include firewalls, digital encryption, access restriction and authorization controls. While we are dedicated to protecting your personal information, security cannot be absolutely guaranteed against threats. In the event that we become aware of a data breach which may cause you a disadvantage, we will notify you accordingly, without undue delay.

1. **CHANGES TO THIS PRIVACY NOTICE**

We may modify this Privacy Notice from time to time in order to reflect our current practices and/or in accordance with any changes in the applicable legal framework. The new version of this Privacy Notice will be available on the Bank’s website.