

# INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR JOB APPLICANTS IN THE RECRUITMENT PROCESS

Version dated 19.11.2024.



## 1. General information

Joint Stock Company RĪGAS PIENA KOMBINĀTS (hereinafter referred to as "the Company") hereby informs job applicants who apply for a vacancy within the Company and/or participate in the selection process (hereinafter referred to as "applicants") about the processing of their personal data in relation to their application and participation in the selection process.

The Company will process applicants' personal data in accordance with the requirements 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* (hereinafter referred to as "General Data Protection Regulation" or "GDPR"). The Company will provide the applicant (data subject) with information on the processing of personal data, as required by Articles 13 and 14 of the General Data Protection Regulation, through this notice.

The Company informs you that, with regard to the processing of applicants' personal data, it is considered to be the data controller within the meaning of the General Data Protection Regulation. The contact details of the data controller can be found at the end of this notice.

## 2. Personal data and collection thereof

When applying for a vacancy and during the selection process, personal data is collected from the applicants themselves. The Company collects and processes the personal data provided to it by the applicant and only to the extent necessary for the Company to select, evaluate and assess the applicants and choose the best candidate for the job vacancy.

The Company may obtain the applicant's personal data from the applicant, e.g. from the applicant's CV (Curriculum vitae), motivation letter, recommendation letter, information provided during the job interview, etc. The Company may also obtain personal data about the applicant from other persons and sources, such as recommendations about the applicant from the applicant's former employer or former manager, as well as from publicly available information about the applicant (e.g. international business and employment platform LinkedIn, etc.). For a more specific list of categories and types of personal data, see the table in Section 3 here below.

The Company requests that applicants refrain from providing personal data that are not necessary and/or relevant for the purpose of the selection process (such as information regarding an applicant's political, religious, or other beliefs, pregnancy, marital status, financial situation, national or social origin, etc).

If the applicant has listed a person as a referee, the applicant is obligated to inform that individual that their personal data will be shared with the Company for the purpose of providing feedback or recommendation about the applicant.

The basis for processing the applicant's personal data is the applicant's consent. For preparation for the conclusion of the employment contract, the applicant is asked to provide the personal data required by the legislation (e.g. for referral to the mandatory health check) and for the conclusion of the employment contract.

Providing personal data to the Company is voluntary, however, if an applicant does not consent to the processing of certain of his/her personal data, his/her job application may not be considered during the selection process. The applicant may withdraw his/her consent at any time, in which case his/her participation in the selection process will be terminated.

### 3. Purposes and legal bases for processing personal data

The Company may obtain and process the applicant's personal data listed in the table below (the list is not exhaustive) and in accordance with the purposes set out in this table:

<b>Categories and types of personal data</b>	<b>Purposes of the processing</b>	<b>Legal basis</b>
<p>Identification data: name, surname, personal identification number, passport or identity card (ID card)</p> <p>Payment details: bank, account number.</p> <p>Contact details: home address, email, phone number.</p>	<p>Personal identification among applicants.</p> <p>Submitting a job offer.</p> <p>Drawing up a contract of employment with the selected applicant.</p> <p>Sending the applicant for a mandatory health check.</p>	<p>Article 6 (1) (a) (consent of the data subject) and (b) (pre-contractual measures) of the GDPR.</p>
<p>Contact details: email, phone number.</p>	<p>Contacting the applicant.</p> <p>Making an offer of employment.</p>	<p>Article 6 (1) (f) of the GDPR (legitimate interests of the controller or of a third party)</p>
<p>Qualifications: education, work experience, other information relevant to the requirements of the vacancy.</p> <p>Recommendations: identity and contact details of current or former employer's representative, feedbacks, references.</p> <p>Data from interviews, tests, assignments: results of tests, assignments, interviews and other information gathered during the selection process.</p>	<p>Assessing the applicant's suitability for the vacancy.</p> <p>Selecting the most suitable applicant for the job vacancy.</p>	<p>Article 6 (1) (f) of the GDPR (legitimate interests of the controller or of a third party).</p>
<p>Data on eligibility for specific criteria, authorizations, data on criminal records and other information (applicable for foreign applicants and applicants for specific job positions).</p>	<p>Ensuring compliance with laws, regulations and the legitimate interests of the Company.</p>	<p>Article 6 (1) (f) of the GDPR (legitimate interests of the controller or a third party) and (c) (compliance with a legal obligation).</p>
<p>Video recording (video surveillance is carried out on the Company premises and the resulting video recordings, which may include an image of the applicant).</p>	<p>According to the notice on the processing of video surveillance data<sup>1</sup>.</p>	<p>According to the notice on the processing of the video surveillance data<sup>1</sup>.</p>

<sup>1</sup> Information on the processing of personal data in the context of video surveillance is available on the web page [www.foodunion.com PRIVACY POLICY](https://www.foodunion.com/privacy-policy/) section (<https://www.foodunion.com/privacy-policy/>).

Other data: any other data provided by the applicant at his/her discretion during the selection process.	The applicant's eligibility for the vacancy. Evaluation/selection of the most suitable applicant.	Article 6(1)(a) (consent of the data subject) and (f) (legitimate interests of the controller or a third party) of the GDPR
All of the above personal data (as appropriate, relevant and necessary)	Protecting the legitimate interests of the Company (for example, in dispute resolution proceedings, to provide explanations to the authorities, in audits or in connection with requests for inspections by public authorities).	Article 6 (1) (f) of the GDPR (legitimate interests of the controller or a third party) and (c) (compliance with a legal obligation).

Where an applicant's personal data is processed on the basis of the legitimate interests of the Company, these legitimate interests include: ensuring compliance with the Company's approved internal laws and regulations, selecting the most appropriate applicant for the efficient conduct of the Company's business and other internal processes, protecting the Company's legitimate interests in disputes, and protecting property and other interests arising from the processing of CCTV data.

#### **4. Recipients of personal data**

The Company may disclose the applicant's personal data to third parties providing testing, assessment, research and other recruitment services; to the applicant's former employers for the purpose of obtaining information about the applicant's previous work experience; to authorities monitoring the employer's activities, as well as to law enforcement authorities, such as the State Police, national security authorities, in the cases provided for by law. If an applicant has applied for a vacancy via a recruitment platform (e.g. [www.cv.lv](http://www.cv.lv)), their personal data will also be accessible to the operators of these platforms, and they should search or ask for the privacy policy or personal data processing statement to the respective platform or the service provider.

The Company does not transfer applicants' personal data outside the European Union and European Economic Area.

The applicants' personal data may also be accessible to independent service providers who provide to the Company such services as information technology (IT), email delivery, security, legal and other services. Personal data will only be transferred or made available to these third parties for the purpose of providing the services.

The Company may transfer an applicant's personal data to another Food Union group Company for the purpose of including the applicant in that Company's recruitment only with the applicant's prior written consent.

#### **5. Duration of processing of personal data**

The applicant's personal data will be kept for as long as is necessary for the purposes set out in this notice and, as regards the selection process, for a maximum period of 6 (six) months after the end of the selection process. This deadline is set so that if the first selected applicant does not take up or continue the job, the Company can make an offer to other applicant without having to start a new recruitment process. The notice period and the probationary period are also taken into account in

determining this period.

In case of disputes and legal proceedings, personal data may be stored for longer, in accordance with the principles of data minimisation and purpose limitation.

Upon commencement of employment with the Company, personal data will be processed in accordance with the Labour Law, other employment-related laws and regulations and the Company's internal rules.

## **6. Rights of the data subject**

The General Data Protection Regulation gives data subjects the right to influence the processing of their personal data.

The applicant has the right to access his/her personal data and to obtain information about data processing; to request the rectification of wrong, inaccurate or incomplete personal data, to restrict data processing; to request data erasure; to exercise the right to data portability; to lodge a complaint with the data protection authority; to withdraw consent (if the processing of personal data is based on consent).

In order to exercise rights as a data subject, to withdraw the consent or ask any questions related to the processing of personal data, the applicants may send their request by e-mail or by post to the Company's registered office. In case of unjustified or unlawful processing of personal data the applicant has the right to lodge a complaint with the State Data Inspectorate (in Latvia).

## **7. Information about the data controller**

Name: Joint stock company "RĪGAS PIENA KOMBINĀTS"

Registration number: 40003017441

Address: Riga, 180 Bauskas Street, LV-1004

Phone +371 67066887

E-mail: [foodunion@foodunion.com](mailto:foodunion@foodunion.com)

Contact details of the Data Protection Officer: [dati@foodunion.com](mailto:dati@foodunion.com)