Privacy Notice for Candidates Participating in the Recruitment Process

Aviva Services Sp. z o.o.

Pursuant to Article 13(1) and (2) and Article 14(1) and (2) 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 ("**GDPR**"), we inform you that:

1. Data controller

The controller of your personal data is Aviva Services Sp. z o.o., with its registered office at ul. Inflancka 4B, 00-189 Warsaw, Poland (the "**Controller**").

If you have any questions regarding the processing of your personal data or wish to exercise your rights, please contact the Controller:

- in writing, at the Controller's registered office address indicated above, or
- by email at: **asec_rodo@aviva.com**.

2. Sources of personal data

The Controller obtains personal data primarily directly from you, in particular from application documents, forms, interviews, recruitment tasks and correspondence relating to the recruitment.

In the course of the recruitment, the Controller may also generate information relating to the progress and outcome of the process, in particular interview notes, task results, candidate assessments and feedback.

Where data has not been obtained directly from you, it may come from another company of the Aviva Group, in particular in the case of internal or group recruitment, or from a referee indicated by you. Such data may include information about your professional experience, qualifications, skills, competences and references.

3. Categories of personal data processed

Depending on the position, the type of contract envisaged and the course of the recruitment process, the Controller may process the following categories of your personal data:

1. **identification data**, in particular first name and surname, date of birth;
2. **contact details**, in particular telephone number, email address;
3. **data on education, qualifications and competences**, in particular information about schools and courses completed and certificates held;

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4. **data on professional experience**;
5. **data on employment preferences**, in particular information about availability and expected terms, place and manner of work;
6. **data relating to the recruitment process**, in particular information contained in application documents, information obtained during interviews, results of recruitment tasks, assessments and feedback, and the outcome of the recruitment process;
7. **reference data**, where obtaining references is envisaged in the given recruitment process and is carried out in accordance with applicable law;
8. **data necessary to prepare an offer and take steps prior to entering into a contract**, in particular data concerning the proposed position or scope of cooperation, terms of employment or cooperation, start date of employment or cooperation, and remuneration;
9. **other data provided voluntarily by you**, going beyond the scope of data required by the Controller or by applicable law;
10. **special categories of data** referred to in Article 9(1) GDPR, in particular data concerning health or disability, if provided voluntarily by you and there is an appropriate legal basis for their processing;
11. **technical data**, to the extent necessary to use the recruitment form, in particular technical data related to completing and submitting it.

The scope of data processed in a specific recruitment process is limited to information that is adequate and necessary for the purposes set out in this Notice.

4. Purposes and legal bases of processing

Your personal data is processed for the following purposes:

a. Conducting the recruitment process

Conducting the recruitment of employees or contractors and selecting suitable candidates:

- in the case of recruitment for employment under an employment contract, the legal basis for processing the data required by labour law is Article 6(1)(c) GDPR;
- in the case of recruitment for cooperation under a civil-law contract, the legal basis for processing is Article 6(1)(b) GDPR;
- with regard to personal data provided by you voluntarily, beyond the scope required by the Controller, the legal basis for processing is your consent, in accordance with Article 6(1)(a) GDPR;
- with regard to special categories of personal data referred to in Article 9(1) GDPR provided on your own initiative, the legal basis for processing is your explicit consent, in accordance with Article 9(2)(a).

b. Presenting an offer and entering into a contract:

If the Controller decides to offer you employment or cooperation, your personal data will be processed in order to prepare and present the offer, agree the terms of

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employment or cooperation, prepare the relevant documents and enter into the contract:

- in the case of an employment contract, the legal basis for processing is Article 6(1)(c) GDPR in conjunction with the relevant provisions of the Polish Labour Code;
- in the case of a civil-law contract, the legal basis for processing is Article 6(1)(b) GDPR.

c. Future recruitment

If you give separate consent, your personal data will also be processed in order to consider your application in future recruitment processes conducted by the Controller. The legal basis for processing is your consent, in accordance with Article 6(1)(a) GDPR.

d. Establishment, exercise or defence of legal claims

Personal data may be processed for the establishment, exercise or defence of legal claims related to the recruitment process.

The legal basis for processing is Article 6(1)(f) GDPR, i.e. the Controller's legitimate interest in protecting its rights and interests and being able to demonstrate that the recruitment process was conducted properly. With regard to special categories of data, the legal basis is Article 9(2)(f) GDPR.

5. Automated decision-making

The Controller may use IT tools to support the organisation or conduct of the recruitment process. Such tools may be used in particular to receive and organise applications, manage candidate information, communicate with candidates and support the persons conducting the recruitment.

However, your personal data is not used to make decisions about you based solely on automated processing, including profiling, which would produce legal effects concerning you or similarly significantly affect you. Decisions regarding the assessment of your application and the outcome of the recruitment process are made with the involvement of the persons responsible for the recruitment.

6. Recipients of personal data

Your personal data may be disclosed to the following categories of recipients, to the extent necessary for the purposes set out in this Notice:

a. Internal recipients

Authorised persons and organisational units of the Controller may have access to personal data where this is necessary to conduct the recruitment process, fulfil the Controller's obligations or protect its rights and interests.

b. Aviva Group companies

Personal data may be transferred to other Aviva Group companies in connection with conducting recruitment and operating the related processes and systems.

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c. External recipients

External recipients of your personal data may include in particular:

- entities providing recruitment, advisory, legal or audit services to the Controller;
- providers of recruitment and HR systems and other IT systems and tools used to conduct recruitment;
- providers of hosting, maintenance, support and security services for IT systems;
- postal operators and courier companies;
- public authorities, courts or other authorised institutions, where an obligation or right to disclose data arises from the law.

Where a recipient processes personal data on behalf of the Controller, the data is disclosed to it only to the extent necessary to perform the entrusted tasks, on the basis of a contract and in accordance with the Controller's instructions.

Some recipients may process data as independent controllers where they determine the purposes and means of processing themselves on the basis of applicable law.

7. Transfers of personal data to third countries

Your personal data may be transferred to third countries, i.e. outside the European Economic Area, in connection with the Controller's use of group systems and services supporting recruitment processes and the involvement of Aviva Group entities in those processes.

Where data is transferred to countries for which the European Commission has issued an adequacy decision, the transfer is based on that decision. In other cases, the Controller applies appropriate safeguards required by the GDPR, in particular standard contractual clauses adopted by the European Commission.

Information about the safeguards applied and how to obtain a copy of them can be obtained by contacting the Controller as indicated in point 2.

8. Retention period

Personal data processed in connection with the recruitment process will be retained for 18 months from the date on which it was provided to the Controller in connection with the recruitment.

If the candidate has consented to the processing of personal data for future recruitment processes, the data may also be used during this period for such recruitment, but no longer than until the consent is withdrawn. The withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal.

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If, before the end of the retention period, a claim is raised, proceedings are initiated or a justified need arises to secure the data in connection with a dispute, the data may be retained until the matter is finally concluded and any related claims are settled.

9. Voluntary nature of providing personal data

If you are applying for employment, providing the personal data required by labour law is mandatory. To the extent necessary to perform work of a particular type or in a particular position, this also applies to data concerning education, professional qualifications and employment history. Regardless of the type of contract, providing the personal data necessary to conduct the recruitment process and assess your application is required in order to take part in the process. Failure to provide the data necessary for the recruitment may prevent your application from being considered or a contract from being concluded.

Providing any other personal data is voluntary.

Giving consent to the processing of personal data for future recruitment processes is voluntary and does not affect your participation in the current recruitment process.

10. Data subject rights

In connection with the processing of your personal data, you have the following rights, under the terms set out in the GDPR:

- the right of access to your personal data and to obtain a copy of it;
- the right to rectification, erasure or restriction of processing;
- the right to data portability;
- the right to object to the processing of your data;
- the right to withdraw consent at any time, where processing is based on consent, without affecting the lawfulness of processing carried out before its withdrawal;
- the right not to be subject to a decision based solely on automated processing, including profiling, under the terms set out in the GDPR;
- the right to lodge a complaint with the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych).

Requests to exercise the above rights should be sent to the following email address: **asec_rodo@aviva.com.**

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