

NOTICE ON PROCESSING OF PERSONAL DATA OF JOB APPLICANTS IN THE LAW FIRM KOVAČEVIĆ PRPIĆ SIMEUNOVIĆ D.O.O.

This Notice on Processing of Personal Data (“**Notice**”) applies to the processing of personal data of job applicants and applicants for student internships (“**candidates**”) conducted by the law firm Kovačević Prpić Simeunović d.o.o. with its registered office in Zagreb, Trg žrtava fašizma 6, PIN 00476134480 („**KPS**”).

KPS is data controller of the processing of personal data of job applicants. In this Notice we describe who we are, which categories of your personal data we process, how and for what purposes, how we protect your personal data and what rights do you have in relation to our processing of your personal data.

1. WHICH CATEGORIES OF JOB APPLICANTS’ PERSONAL DATA DOES KPS COLLECT AND PROCESS?

KPS collects the following categories of personal data of job applicants:

Identification information	Name, surname, date and place of birth, signature etc.
Contact information	E-mail address, phone number, data on domicile/residence etc.
Information on qualifications and work experience	Resume submitted by the applicant, evidence on adequate level of education (copy of diploma etc.), evidence on work experience on adequate position etc.
Other information voluntarily provided by the job applicant	Your data submitted to KPS via e-mail or letter, during phone call or conversation in person etc.

In general, KPS does not collect special categories of personal data of job applicants. However, it is possible that some job applicants, through the documentation they submit in the job application, will provide us with some of their personal data which represents a special category of personal data, such as photography or a note that (s)he is a person with disability.

2. FOR WHAT PURPOSES DOES KPS PROCESS PERSONAL DATA OF JOB APPLICANTS?

KPS processes personal data of job applicants for the following purposes:

a. **for selection of a job applicant which we shall employ**

KPS primarily processes personal data of job applicants to determine whether the applicants fulfil all requirements of the respective work post they applied for and potentially to check applicants’ competences by evaluation and/or job interview.

Such evaluations enable KPS to employ the job applicant who fulfils all requirements set out in job advertisement and who accomplished the best results during evaluation and job interview.

For such purpose KPS processes applicant's identification information, information on qualifications and work experience and other data proving that the applicant fulfils requirements for the respective work post. KPS may also test applicant's expertise and other work competences, either in writing or through job interview.

In such case KPS processes applicant's personal data because such processing is necessary in order for KPS to be able to take appropriate actions prior to the conclusion of the contract at the request of the candidate.

b. for communication with job applicants relating to their job application

If the applicant applies for a work post in KPS, KPS shall use its personal data to communicate with the applicant and potentially to inform them on the status of their job application. KPS can also use job applicant's personal data to answer their queries.

For this purpose, KPS processes applicant's identification and contact information.

In such case KPS processes applicant's personal data because such processing is necessary in order for KPS to be able to take appropriate actions prior to the conclusion of the contract at the request of the candidate.

c. for the purpose of potential employment of the job applicant

In case KPS decides to employ the job applicant, KPS shall process its personal data collected during job application and the employment process in order to prepare and conclude the employment agreement. After the conclusion of the employment agreement, job applicant's personal data shall be stored in records which KPS is obliged to keep on its employees in accordance with employment regulations.

For that purpose, KPS collects job applicant's identification and contact information, as well as other data relevant for establishing employment relation in KPS.

In such case, KPS processes job applicant's personal data because it is necessary for the conclusion and execution of the employment agreement concluded with the job applicant and so that KPS could undertake adequate steps at the request of the job applicant before concluding the agreement.

d. to comply with legal obligations of KPS

KPS occasionally processes job applicant's personal data to comply with laws and other regulations, i.e. to comply with legal obligations of KPS as a data controller. Such obligations can be applied to human resources management and keeping of adequate records, prohibition of discrimination, priority in employment of certain groups of people etc.

It is possible for KPS to be bound, under law or other regulations, to deliver personal data of job applicants to other government and/or supervisory authorities.

For such purpose, KPS processes applicant's identification and contact information, information on qualifications and work experience, as well as other data and documents which demonstrate that the job applicant fulfils requirements for the respective work post.

In such case, KPS processes applicant's personal data because it is necessary for compliance with its legal obligations.

e. for potential future employment of job applicants which have not been selected

In the event that KPS decides to employ another job applicant, personal data of applicant who applied for the job which are collected during their job application shall be kept by KPS only if the applicant which has not been selected gives their consent.

KPS processes such data for the purposes of potential future employment and contacting of the applicant.

In such case KPS processes applicant's personal data based on applicant's explicit consent.

3. HOW DOES KPS COLLECT APPLICANT'S PERSONAL DATA?

In general, KPS collects personal data directly from the data subject (applicant). It is possible that KPS will also collect certain personal data of applicants from third parties (for example employment agencies, the Croatian Employment Service etc.)

Some personal data of KPS candidates may be collected from publicly available sources.

4. HOW LONG DOES KPS KEEP PERSONAL DATA OF JOB APPLICANTS?

KPS retains applicant's personal data for the period necessary for accomplishing abovementioned purposes, i.e. until the selection of the applicants for a particular job position and conclusion of the employment contract with the selected applicant, and no later than 30 days after the completion of the applicant selection procedure.

In the event, that the job applicant has submitted an open job application letter on its own initiative, its personal data shall be kept for a maximum of 30 days from the receipt of such open job application.

Upon applicant's consent, KPS shall keep applicant's personal data for further period of one year from the date when the job application is closed, for the purpose of selection of a job candidate and communication in case of future employment.

Retention terms and other rules on processing of personal data are set out in KPS Personal Data Retention Policy.

Upon expiry of the period necessary or prescribed for processing of personal data, KPS shall securely delete or destroy applicant's personal data.

5. WHO HAS ACCESS TO PERSONAL DATA OF JOB APPLICANTS?

Access to applicant's personal data can be granted to the employees of KPS who participate in the recruitment process and who have limited rights to access and process personal data for the purposes of performing their work tasks, especially members of the management and office manager.

KPS employees authorized to access or otherwise process job applicant's personal data are obliged to keep personal data confidential and to act in accordance with privacy notices, policies, procedures and other internal regulations, as well as contractual obligations of KPS.

Access to applicant's personal data can be granted to third parties who are service providers of KPS, such as IT service providers.

If necessary, for employment of job applicant in KPS or for complying with legal obligations of KPS, applicant's personal data may be delivered to third parties, such as Croatian Employment Service etc.

Where necessary, we have concluded contracts with the aforementioned third parties which ensure appropriate technical and organizational measures for the protection of your personal data.

In some cases, personal data may be transferred to countries which are not members of the European Union and European Economic Area, which may have different and potentially lower standards of personal data protection than those prescribed in the Republic of Croatia. In such case KPS shall undertake appropriate protective measures in order to ensure an adequate protection of your personal data. Such measures include conclusion of the agreements in accordance with forms which have been adopted by the European Commission for such purpose (using so-called standard contractual clauses for transfer of personal data abroad).

6. HOW ARE PERSONAL DATA OF JOB APPLICANTS PROTECTED?

In order to protect job applicant's personal data, KPS undertakes appropriate protective measures which are in accordance with applicable regulations on protection of privacy and personal data.

This also includes request towards KPS service providers to take appropriate measures in order to protect the confidentiality and safety of job applicant's personal data.

In its business KPS has implemented technical, physical and organizational measures for protection of job applicant's personal data from accidental or illegal destruction, accidental loss, damage, alteration, unauthorized disclosure or access and all other forms of illegal and/or excessive processing.

7. WHAT ARE THE JOB APPLICANTS' RIGHTS AND HOW CAN THEY BE EXERCISED?

Within the scope of protection of personal data, applicants have the following rights:

- a. right to access their personal data, i.e. the right to obtain from the controller confirmation as to whether or not personal data concerning them are being processed, right to request access to personal data and information on processing as well as a copy of personal data being processed;
- b. right to rectification of inaccurate personal data and right to have incomplete personal data completed;
- c. right to erasure of personal data, especially if such data are no longer necessary in relation to purposes for which they were collected or otherwise processed, if the personal data have been unlawfully processed, if the personal data have to be erased to comply with a legal obligation or if the consent has been withdrawn;
- d. right to restriction of processing;
- e. right to object to data processing;
- f. right to lodge a complaint with the Croatian Personal Data Protection Agency.

KPS shall undertake all measures to enable job applicants to exercise the abovementioned rights, however in certain cases the exercise of these rights can be limited or excluded.

8. TO WHOM CAN YOU REFER QUESTIONS ON PERSONAL DATA PROTECTION?

For any information, feel free to contact KPS by sending an email to the following email address: info@kps-law.com, in person at the KPS business premises or by sending a letter to the following address: Kovačević Prpić Simeunović d.o.o., Trg žrtava fašizma 6, 10000 Zagreb.

9. AMENDMENTS TO THE NOTICE AND CONSOLIDATED VERSION

This Notice shall apply as of 25 May 2018 and is subject to occasional amendments.

The last version of this Notice, which shall always be relevant for processing of personal data of job applicants, is available on KPS website www.kps-law.com.