



Privacy Notice for Candidates

January 2019

Candidate Privacy Notice

This notice applies to Personal Data relating candidates only, regardless of the media on which it is stored (paper, electronic or otherwise). This notice does not apply to anonymous information, namely, information which does not relate to an identified or identifiable natural person or to Personal Data rendered anonymous in such a manner that the Data Subject is not or no longer identifiable. Please note that once a candidate is hired by the company, the employees Personal Data becomes subject to the company's Employee Privacy Notice for the duration of their employment.

This notice applies to candidates to the following legal entities:

- American Hellenic Hull Insurance Company
- Hellenic Hull Management (HMA) Limited

Personal Data:

Any information relating to an identified or identifiable natural person ('Data Subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that unnatural person.

Special Categories of Personal Data:

Any sensitive Personal Data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sexual orientation.

Data Controller:

This is natural or legal person, public authority, agency or another body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data. For the purposes of the EU General Data Protection Regulations and relevant law, the company is the Controller and Processor of data.

Data Subject:

is any living individual who is the subject of Personal Data held by an organisation. Data Subjects within the company may include current, past and prospective employees, sub-contractors, suppliers and customers and other individuals with whom the company communicates.

Processing:

Means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or

combination, restriction, erasure or destruction.

Processor:

Means a natural or legal person, public authority, agency or another body which processes Personal Data on behalf of the Controller

Anonymisation:

This is the process of turning data into a form which does not identify individuals and where identification is not likely to take place. This allows for a much wider use of the information.

Candidate Personal Data can be submitted to the company in a number of ways, including but not limited to the following:

- Electronically submitted through the company's online job opening pages (via social media).
- Electronically submitted to the company recruitment application via an online recruitment portal (website).
- Electronically submitted by email directly to Human Resources by a candidate or recruitment agency on a candidate's behalf.
- Electronically submitted by email directly to a member of the company directly by a candidate or recruitment agency on a candidate's behalf.
- Submitted by post to the company Human Resources.

The company only collects the amounts and types of data that are required to effectively administer its recruitment and hiring processes.

The company collects some or all of the following information in relation to candidates which contain Personal Data such as name, qualifications, employment history, contact details and assessments relating to that candidate.

- Cover letter
- Curriculum vitae (CV)/resume
- Interview notes
- References and other information required to verify information received during the recruitment and hiring process
- Results of psychometric testing

The company does not require not ask for any Special Categories of Personal Data in pursuit of its recruitment and hiring process.

The company requests that candidates only submit CVs or resumes with information relevant and required for the recruitment process such as:

- Name, email address and contact number
- Employment history, including prior employment, relevant positions and dates
- Education history, including qualifications or certifications obtained, dates and issuing institutions, and other relevant awards and/or achievements

As a potential employer, the company is required to source and collect, process and retain information such as that noted above for normal recruitment and hiring purposes. The company will process such Personal Data for the purpose of determining whether a candidate will become an employee or contractor of the Company for a specific position or for job opportunities in the future.

The company will share CVs, resumes cover letters and interview notes with the company's Human Resources personnel and hiring managers as required to administer and undertake the recruitment and selection process.

The company will share CVs or resumes with relevant employees participating on interview panels on behalf of the Company.

Candidate information will not be disclosed to any other third party without the candidate's consent.

Candidate Personal Data will not be transferred outside the European Economic Area.

To store candidate data and to administer its recruitment processes, the company uses its server files; server access is in compliance with GDPR requirements. Candidate's CVs, resumes and/or cover letters are stored in company's server that ensures the safety and confidentiality of such data.

Candidate CVs, resumes and/or cover letters will only be distributed to employees involved in a specific recruitment process through this application by sending to that employee, a candidate's profile. Employees are not allowed to make local copies of CVs or resumes, or distribute candidates' CVs or resumes to other employees or individuals. Access to server file requires relevant access rights, restricted and controlled by the Human Resources and IT function.

The company will retain Personal Information in line with the Data Retention Policy and, for as long as is necessary to comply with our statutory and contractual obligations in accordance with our legitimate interests as a data controller. In total, the company will retain candidate data for up to 24 months from receipt, after which time such data will be deleted, with the exception of a candidate's name, date of application, role applied for and outcome, which will be retained until you withdraw your consent. The rationale for retaining candidate data for a period of 24 months is to provide sufficient time for the vacancy in question to be filled and, thereafter, to allow the company process the candidate's data for related vacancies that may arise.

The Company's Data Retention Policy can be obtained on request by contacting any member of the Human Resources Function.

References, when sought, will be to verify and validate information received during the recruitment and selection process. References will not be sought in relation to any candidates without written permission from the candidate.

Psychometric testing will only be carried out for specific roles. Candidates will be required to give their consent in writing in advance of taking any psychometric tests. The Company ensures the protection of candidates' rights by:

- Providing the candidate with a copy of the psychometric test report.
- Only using the results of psychometric testing as part of the selection criteria only and not as a determining factor.
- Under the General Data Protection Regulation (GDPR), candidates have a number of rights with respect their Personal Data.
- The right to access to the Personal Data that the company holds in relation to that candidate together with information about the Processing of that Personal Data.
- The right to request that any inaccurate Personal Data held about the candidate is corrected, or, if we have incomplete information, the candidate may request that the company update that information so that it is complete.
- The right, in certain circumstances, to request that the company erases a candidate's Personal Data.
- The right, in certain circumstances, to request that the company no longer processes a candidate's Personal Data.
- The right to object to the Processing of a candidate's Personal Data by the company but only where we are Processing the Personal Data on the grounds of a legitimate interest.
- For Cyprus; The right to complain to the Commissioner for the Protection of Personal Data, who can be contacted at 1 Iasonos street, 2nd floor, 1082 Nicosia; tel: 22818456; fax: 22304565; email: commissioner@dataprotection.gov.cy ; www.dataprotection.gov.cy.
- For Greece; complaints to the Hellenic Data Protection Authority (HDP) at complaints@dpa.gr / www.dpa.gr, Kifissias Avenue 1-3, 1st floor Athens 115 23.

The company, at all times, reserves the right to process Personal Data for the establishment, exercise or defense of legal claims.

Should candidates have any queries in respect to their rights in relation to Personal Data they should contact the company's Human Resources at operations@ahhic.com / gdpr@ahhic.com. The company will respond to you without delay and, in any event, within one month. Further, candidates are entitled to lodge a complaint with the Commissioner for the Protection of Personal Data if they are not happy with the company's response when they chose to exercise any of their rights noted above. Please note that the company is allowed to refuse such a request in certain limited circumstances and, if this arises, we will let the candidate know without delay.

In some cases, a candidate may decline to provide the company with their Personal Data. If we believe that we require that relevant information to effectively and properly manage our recruitment process, we may not be able to continue our relationship with that candidate and will inform the candidate accordingly.

For the purposes of the EU General Data Protection Regulations and relevant law, the company is the Controller and Processor of data.

Any concerns, questions or requests for further information should be addressed to one of the following:

American Hellenic Hull Insurance Company, exclusively managed by Hellenic Hull Management (HMA) Limited

Piraeus & Limassol:

Mrs. Fyllio Benaki, HR Officer

operations@ahhic.com

The company reserves the right to amend this policy as necessary and in the interests of best business practice.