Policies & Procedures Manual – Corporate Governance

### 1. Scope

The current policy refers to the collection, processing and handling of personal and sensitive personal data of Job Applicants.

## 2. Policy

It is the company's policy

- □ To collect only the data that are necessary in order to evaluate job applicants with completeness, objectivity and reliability.
- □ To handle the job applicants' data we collect with respect, keeping them strictly confidential from any third party and using them only within the purposes of our recruitment procedures.
- □ To give job applicants the right to request the updating and / or deletion of their personal data from our corporate records and data basis and to comply with such requests immediately.
- ☐ To ensure maximum information, IT systems and data basis security and to protect them from malicious violation with all available technological tools.

## 3. Special Issues

#### 3.1. Data and information

Personal data we collect by job applicants include

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- Contact information (telephone numbers, e-mail, address, etc)
- ☐ Professional data (education, training, employers, achievements, failures, etc)
- ☐ Personal data (date of birth, health issues, etc)

Moreover, for the complete evaluation of job applicants it is possible to collect information regarding views and opinions of job applicants on various business issues, as well as information about their character, their preferences and their interests.

The above data and information are collected mainly through the CV and personal contact (interviews) of our employees with job applicants. For the collection of the above data and information additional sources may be used, such as social media, former employers' references, etc.

#### 3.2. Use of data and information

Personal data of job applicants are used by the company for communicating with them for evaluation and selection purposes either within specific job openings or not. CVs that are sent for specific job openings may be exploited for all available positions and not necessarily the one the applicant applied for.

### 3.3. Sharing of data and information

It is possible that the company shares job applicants' data with other companies of the OFET Group or with approved partners, such as recruiters and business consultants, taking all necessary and appropriate measures for ensuring data privacy and protection.

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### 3.4. Data and information protection measures

The company takes all necessary technological and other measures for the protection of job applicants' personal data from unauthorized access, use, disclosure, alteration or destruction.

### 3.5. Consent and rights

By submitting their CVs, job applicants provide their explicit and clear consent to use them for the purposes stated above.

Job applicants reserve the right (a) to request at any time access to and alteration, correction or destruction of their data kept by the company, (b) to withdraw their consent for the keeping, processing and use of their data, (c) to request the limitation of the use of their data and (d) to submit complaints for possible violation of this policy and the applicable data protection law.

# 3.6. Keeping of data and information

The company keeps all CVs for one (1) year and then destroys / deletes them, unless otherwise clearly and explicitly agreed by both the company and the job applicant.

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