

Recruitment Privacy Principles

Effective as of 03.10.2022

We care about Your right to privacy and want to guarantee that Your Personal Data is well kept at Inbank. Here We provide all relevant information on how We Process Personal Data of candidates when we are recruiting new employees to Inbank.

We Process Personal Data pursuant to applicable law, including the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council, other applicable legal acts and these principles.

We will implement appropriate, risk-based organisational, physical and information technology measures to guarantee protection of Your Data from unintentional or unauthorised Data Processing, disclosure or destruction.

We may amend these principles unilaterally at any time. Therefore We recommend You to visit our website where You will always find the latest version.

1. DEFINITIONS

Personal Data (Data)	Any information about You that is in Our possession and which can be connected directly to You as an individual. The information includes Your personal data, contact details, education and work experience data and etc.
Data Processing	Any operation executed with Your Personal Data, incl. collection, recording, organisation, retention, alteration, disclosure, grant of access to, making inquiries and statements, use, transmission, deletion, etc.
We or Inbank	AS Inbank and the companies belonging to the consolidation group that act as the controller of the Personal Data. The list of companies belonging to Inbank group (hereinafter Inbank Group) is provided on Inbank's website.
You	Every person who intends to be Our colleague and applies for vacancies.

2. INFORMATION ABOUT YOUR DATA PROCESSING

2.1. What Personal Data do We Process?

General information about You: name, surname, date of birth, citizenship, data confirming the right to reside and work in the country where the place of employment is located;

Contact details: address of residence, e-mail, telephone number;

Information on Your work experience: workplaces, period of work, position, responsibilities;

Information on Your competencies: educational institution, education, information about trainings received, certificates obtained, information on language skills and other competencies, results of personnel selection tests;

Recommendations, previous employers' feedback (if applicable): the person recommending or giving feedback, his/her contact, the content of the recommendation or feedback;

2.2. What is the purpose of Processing Your Personal Data?

We Process Your Personal Data for the purpose of selection of candidates for vacancies in Inbank and for the evaluation of Your candidacy, to make the recruitment decision and to communicate with You. We also use Personal Data in order to prepare documents if You are hired.

We may direct You during the recruitment process to personnel selection test in order to simplify and expedite the recruitment process as this is an additional measure to assess your suitability to the position. The personnel selection test is usually carried out by a third party who is the controller of the data You enter and the answers You provide. We do not make any decisions about You automatically and every step involves human intervention.

In addition, We may process your Data for the purpose of compiling recruitment statistics.

We may also process your Data in order to offer You new vacancies after the recruitment process provided that You have given relevant consent.

2.3. On what basis We Process Your Data?

We Process Your Data in order to take steps prior to entering into the employment contract in accordance with the CV and/or application submitted by You (article 6 (1) (b) of the General Data Protection Regulation). In certain cases, processing may be necessary for the fulfilment of legal and regulatory obligations in accordance with article 6 (1) (c) of the General Data Protection Regulation. We do not ask data that We cannot process on legitimate basis.

When using the personnel selection test, We process the results in order to take steps prior entering into the employment contract (article 6 (1) (b) of the General Data Protection Regulation).

We process recruitment statistics on the basis of our legitimate interests in order to improve recruitment processes (article 6 (1) (f) of the General Data Protection Regulation).

We may ask for Your separate consent to allow Us to retain Your Data after the end of recruitment process to offer You new vacancies (article 6 (1) (a) of the General Data Protection Regulation).

If We receive Your CV and/or other application documents or information not directly from You, but from other sources, We assume that You have received all the necessary information about the processing of Your Data and have given Your consent to the relevant entity, including the right to provide Your Data to potential employers with the right to Process Your Data for the purpose of Your candidacy evaluation and recruitment.

2.4. What sources are being used to collect Your Personal Data?

We usually receive Your Data directly from You - when You respond to Our job advertisement and/or provide Us with Your CV or other application documents. We may also receive information about You from the person recommending You that You have named during the recruitment process. Here You have an obligation to ensure that You have an appropriate legal basis for the transfer of the personal data of the persons recommending You.



We may also obtain information about You from entities providing recruitment services e. g. employment agencies, job search portals or career social networks (e. g. LinkedIn). We get the results of the personnel selection tests from the organiser of the respective tests. We only have access to data from public sources if You have previously disclosed the data yourself.

2.5. Do You have to provide Us with Your Personal Data?

In order to apply for vacancies, You must provide Us with the information about Yourself that is necessary for Us to determine whether Your candidacy meets Our needs.

2.6. What are the consequences of not providing Us with Your Personal Data?

If You do not provide information necessary to evaluate Your candidacy, We will not be able to offer You a job.

2.7. May We transfer Your Personal Data to third parties?

We may disclose and/or transmit Your Data to:

- to companies belonging to the Inbank Group that may use the Data for the purposes described above;
- to third parties who assist Us in the selection of candidates, e. g. personnel selection and/or evaluation service providers;
- legal entities providing Us with data systematization, transmission, storage and processing services;
- competent law enforcement authorities upon their request and / or when Data provision is required by applicable law.

2.8. In what territories and jurisdictions do We Process Your Personal Data?

We only Process Your Personal Data in the European Economic Area. We do not currently intend to transfer Your Data to processors or recipients in third countries.

2.9. How long are We going to Process Your Personal Data?

We will retain Data obtained during the recruitment process for as long as it is necessary to evaluate the application but no longer than three months after the end of the process of selection for the vacancy for the purpose of resolving any disputes. If You have given your consent to offer You new vacancies after the end of the recruitment process, We will retain Your Data for two years after obtaining Your consent.

Upon expiration of the retention period, We will destroy Your Data safely and irrecoverably.

2.10. You have the right to:

- access Your Data that We process;
- request correction, supplementation or deletion of incorrect or incomplete Data;
- withdraw Your consent to Your Data Processing. In this case, the withdrawal of consent does not affect the lawfulness of the Processing done before the withdrawal of consent;
- restrict the Processing of Your Data if You wish to (1) challenge the accuracy of your Data; (2) to record illegal processing of Data; (3) You need Data to create, file or defend a legal claim; (4) You object to the processing of Your Data on the basis legitimate interest and wish to restrict the processing until a decision is made;
- object to the processing of Your Data if the processing takes place on the basis of Our legitimate interest;
- receive Your Personal Data You have submitted to Us Yourself and that are automatically Processed on the basis of Your consent or in order to take steps prior to entering into employment

contract in a widely used electronic format and, if this is technically possible, transmit these Data to another entity;

- request that no decisions are made in respect of You that are only based on automated decision-making, incl. profiling, if this brings about legal consequences that concern You or has a significant impact;
- file complaints about Your Data Processing to the State Data Protection Inspectorate (www.ada.lt) if You find that the Processing of Your Data constitutes an infringement of Your rights and interest on the basis of applicable law. You can complain about Our actions (or omissions) within 3 months from Our response to Your complaint or within 3 months from the end of the term for reply.

2.11. How can You exercise Your rights?

Contact Us by e-mail if You would like to exercise said rights. You should submit a written request together with an identity document or, in accordance with the law, by using electronic means that allow proper identification of the person. We will reply to You within one month. Data Protection Officer can be reached using Our contact details.

3. OUR CONTACT DETAILS

AS Inbank branch, legal entity code: 305340173

Visit Us – Kareivių st. 11B, 09109 in Vilnius (business center “Eleven”)

Call Us – +370 700 700 80

Write to Us – asmens.duomenys@inbank.lt