

Conditions of processing personal data of job applicants for enterprises of the BLRT Group in Estonia

1. General Provisions

1.1 This document (hereinafter referred to as The Conditions) defines the policy of the enterprises of the BLRT Group (hereinafter referred to as the Group) regarding the processing of personal data of job applicants when recruiting personnel for the Group's enterprises in Estonia.

1.2 On personal data processing the Group adheres to the requirements of the legislation of the Republic of Estonia and the European Union, in particular, the Personal Data Protection Act and the General Data Protection Regulation of the European Union (hereinafter referred to as the Regulation).

1.3 The Conditions apply to personal data received both before and after the approval of this document.

2. Co-controllers

The public limited company BLRT Grupp AS, registration number 10068499, located at Kopli str.103, 11712 Tallinn and other enterprises of the BLRT Group are co-controllers of personal data.

3. Definitions

The following definitions applied in the present Conditions:

Personal data - any information relating to an identified or identifiable natural person (data subject) who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data etc.

Data subject (candidate for an office in the BLRT Group) – a natural person coming into contact with the Group enterprise with objective of employment.

Processing of personal data - any operation or set of operations which is performed on personal data, such as collection, recording, storage, structuring, alteration, consultation, use, erasure or destruction;

Controller - a legal person of BLRT Group, which alone or jointly with others determines the purposes and means of the processing of personal data;

Co-controllers – a legal persons of the BLRT Group, which jointly determine the purposes and means of the processing of personal data;

Processor - a legal person of the BLRT Group, which processes personal data on behalf of the controller.

4. Data types and sources

The Group collects personal data of candidates for strictly defined and justified purposes and does not subsequently process it in any other way that would not meet the purposes of data collection. The Group processes personal data received:

- directly from data subjects or indirectly through job portals;
- from public registers such as the Commercial Register, and other public internet resources and social networks;
- data from third parties.

The following data is requested from **data subjects**:

- personal data: name, surname, contact information. Document confirming the right to work in Estonia for third-country nationals.
- information about education and professional activity: language proficiency; documents confirming the availability of the required education, qualifications, work experience; test results (if necessary); information about the availability of a driver's license etc;
- other data: resume (cv), motivation letter, data on references and other data necessary to evaluate the candidate for the vacant post;
- mandatory data based on the nature of the job and associated security requirements.
- data required for registration of short-term employment and / or residence permits of third-country nationals (according to the requirements of the Police and Border Guard Board to the employer

Data from public registers are requested only regarding the successful candidates.

Data from third parties: data from previous employers and references will only be requested regarding the successful candidates and only if the candidate has been indicated their contact details in his/her CV or has been given his/her consent for his/her personal data inquiry. The BLRT assumes that the candidate has previously obtained the consent of former employers and references to forward their contact details to the BLRT.

5. Purposes and legal grounds for processing of personal data

5.1 Based on the **consent of the candidates**, personal data is collected and processed to:

- search for candidates for vacant posts;
- assess conformity of the candidate for the vacant post with the established requirements.

5.2 Based on a **justified interest**, personal data is collected and processed to:

- check the reliability of the data provided / background check.

6. Transfer of personal data

6.1 The enterprises of the Group may share the personal data of candidates for the purposes described in clause 5.

6.2 Personal data of candidates is not transferred outside the European Union, except for cases when it is necessary to make a decision on the candidate's compliance with the requirements of the vacancy offered by the enterprise of the Group located outside the European Union. In this case, the processing of personal data takes place in accordance with the requirements of the Regulation.

7. Data subject rights

The data subject has the right to:

- make decision about transfer of his/her personal data to the controller;
- withdraw consent for the processing of personal data;
- alter his/her personal data if it is incomplete, outdated or inaccurate;
- demand erasure of personal data;
- receive information regarding the processing of personal data, including in a structured format.
- protect his/her rights and legitimate interests.

8. Storage of personal data

8.1 The personal data of data subjects are stored no longer than required by the purpose of their processing, and are subject to destruction upon achievement of these purposes or in case of loss of the need to achieve them.

8.2 The data of successful candidates are used to conclude an employment contract. If necessary, the candidate is asked for additional data and documents required for the preparation of contracts. The conditions of processing personal data of employees are covered in a separate document.

8.3 The Group retain the data of unsuccessful candidates for one year after the end of the competition, thereafter the data on paper will be destroyed and the data stored in electronic form will be erased. If the Group has been requested and obtained the candidate's consent to the retention of data for a longer period, the data shall be retained for the purpose of inviting the candidate to participate in future competitions until the candidate will withdraw his or her consent to data processing.

9. Exercise of data subject rights

9.1 Inquiries concerning the processing of personal data as well as applications made in electronic form regarding the exercise of any of the rights specified in clause 7 should be signed digitally and forwarded to the e-mail address personal@blrt.ee.

9.2 Inquiries and applications prepared on paper (hereinafter referred to as The Inquiry) should be submitted to the Group's head office located at Kopli str. 103, 11712, Tallinn. Inquiry and application can be accepted from the data subject or his/her assignee.

9.3 The Group provides an answer to inquiry within one month after receiving the inquiry. If necessary, this period can be extended for another two months due to the complex nature or the large number of inquiries.

9.4 The Group has the right to ignore the inquiry if it is not possible to identify the person who submitted it.

9.5 The data subject has the right to file a complaint with the Data Protection Inspectorate or a court if he or she finds that his or her rights have been violated during the processing of his or her personal data. The contact details of the Data Protection Inspectorate are available on the website of the Inspectorate <https://www.aki.ee>.

10. Other conditions

10.1 The Group has the right to amend the personal data processing conditions.

10.2 The present Conditions enter into force 10.12.2020.