

## **Conditions of processing personal data of employees of BLRT Group enterprises 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 the Group's employees 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 (employee)** - a natural person in a contractual relationship with a Group enterprise on the basis of an employment contract, tender contract, board member contract, seafarer's contract of employment, etc.;

**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**

4.1 The Group processes personal data of employees received:

- directly from data subjects;
- from public registers such as the Commercial Register, the population registry, the electronic database of the Police and Border Guard Board, the punishment register, etc.;
- data from public Internet resources and social networks.

4.2 The Group processes the following employee data:

- personal data: name, surname, personal identification code, information on citizenship, contact information, information on the size of clothes and shoes (in case of providing work clothes), number of identification document;
- 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; information on in-service and conversion training
- information required to fulfil the terms of the employment contract: current account number; the amount of remuneration, information about the position held, information about the state of health that affects the course of duty.
- registration number of a vehicle (in case of issuing of an entry permit to the territory of the Group);
- data on the presence and number of children (when taking additional leave);
- data obtained from the electronic entry permit system;
- cookie network identifiers;
- other data necessary to keep to the terms of employment contracts and legislation.

#### **5. Purposes and legal grounds for processing of personal data**

Based on a justified interest, personal data is collected and processed for:

- conclusion and keeping to the terms of a contract;
- personnel records management;
- exercising of rights and obligations in accordance with the legislation;
- provision of proper working conditions;
- compliance with the requirements of the laws of the Republic of Estonia and of the regulative acts of the Group.

With **consent of the employee**, personal data is collected and processed:

- to confirm compliance of employee with the requirements in respect of sensitive positions and engaged in the AOE project.

#### **6. Transfer of personal data (including cross-border transfer)**

6.1 The Group's enterprises exchange employee data for performance management, development, career management, accounting and other purposes necessary to fulfil the duties of an employer. Data security is ensured by technical security measures.

## **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.

## **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 personal data of the Group's employees is stored throughout the term of the employment contract.

8.3 Upon expiration of the employment contract, personal data is stored in accordance with the requirements of the actual legislation of the Republic of Estonia.

## **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](mailto: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.

