

# Information Memorandum about the Processing of the Job Applicant's Personal Data

## 1. Introduction

The purpose of this document is to provide you with information about the conditions under which the processing of your personal data will be performed. This obligation is given to ORGREZ, a.s.<sup>1</sup> by Article 13 of the GDPR<sup>2</sup>.

You will find herein the information which personal data are processed by the Company based on your consent or based on other legal basis, for what purposes the Company processes them, to whom the Company may hand them over and what rights you have in relation to the processing of your personal data. Please, consider this document as an important source of information on how the Company handles your personal data.

## 2. Personal Data Processed

We process namely the following personal data:

- ▶ identification details – name and surname, academic degree, date of birth;
- ▶ contact details – namely personal data allowing us to contact you, i.e. the contact address, telephone number, e-mail address;
- ▶ data related to the job performance, namely information on your education, trainings completed, previous experience and references;
- ▶ data on assessment of your suitability – namely evaluation of your profile, test results etc.

## 3. Who Processes and to Whom the Personal Data are Handed Over

The personal data Controller [in the sense of Article 4 (7) of the GDPR] is ORGREZ, a.s., Hudcova 321/76, 612 00 Brno-Medlánky, Company ID No.: 46900829. The Company is entered in the Commercial Register maintained with the Regional Court in Brno, Section B, File 852.

For the personal data processing, the Company may use the services of other processors, as well, who process the personal data based on the Company's instruction. Such processors may be for instance the internet job portal providers like LMC s.r.o. (Company ID No. 26441381), or HR agencies with which the Company has entered into a contract.

The Company is also obliged to hand over the personal data processed to the public administration bodies, courts, law enforcement authorities and supervisory bodies in the case they ask so.

## 4. Scope Purpose and Term of the Personal Data Processing

Within the hiring procedure, we process personal data for various purposes and in varying scope. We process the personal data based on the steps leading to the entering into the contract, based on our legitimate interests and possibly based on your consent.

### **Processing without consent of the job applicant – based on the entering into and performance of the contract and based on our legitimate interests**

Based on the requirements necessary to enter into the contract, we process the identification and contact data of the job applicant, data related to the job performance and data on assessment of suitability for the purposes of searching and contacting candidates for a specific job position and conduct of the hiring

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<sup>1</sup> Full identification details of the Company are specified in Article 3/A, hereinafter only the "Company"

<sup>2</sup> Acronym GDPR means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

procedure including the candidates' verification. This is specifically in order to invite you for interviews and communicate with you and to assess your suitability for the vacant job position based on the background documents provided.

For these purposes, we process the personal data for the time of the hiring procedure unless you grant your consent to us for further processing in job applicants' database.

Based on our legitimate interests, we process the identification and contact details of the job applicant data related to the job performance and details of the assessment of your suitability in order to protect our legal rights.

The job applicant shall have the right to raise an objection against such processing which may be exercised in the manner described in more detail in Chapter 6 "Rights during the Personal Data Processing".

For this purpose, we process the personal data for the limitation period (in the maximum time of three years from the end of the hiring procedure) of the claims arising from or related to the hiring procedure due to the protection of our legal rights. Should court, administrative or other proceedings be opened, the Company processes the personal data of the job applicant in the necessary scope for the time of such proceedings.

#### **Processing based on the job applicant's consent – for the purposes of keeping the job applicants' database**

We process the identification and contact data of the job applicants and data related to the job performance based on the consent of the job applicant in order to contact you with another relevant job offer, as the case may be. If the consent is not granted, these data shall only be processed until the end of the hiring procedure.

The consent granted may be withdrawn, however, the withdrawal of consent does not affect the legitimacy of the personal data processing until the moment of the withdrawal.

### **5. Sources of Personal Data**

We receive most of the personal data directly from you as you communicate them to us within the hiring procedure during the interview, in the CV or another documentation, via the contact form on our internet pages. In addition, we may get the personal data, in a limited scope, from other sources than from the data subject (e.g. from any Company employee) and we would always notify you of such fact. All the processes are always in compliance with legal requirements.

### **6. Rights during the Personal Data Processing**

During the time of the processing of your personal data in the Company, you will have the right [based on the provision of Article 14 (2), Letter c) of the GDPR] to require from the Controller the access to your personal data, their correction or deletion or restriction of processing, the right to raise objection against the processing and the right of the data transferability unless it in discrepancy with the legal regulations or legitimate interests of the Employee or third parties.

At the same time, you have the right to withdraw your consent at any time if the processing is based on the consent [pursuant Article 6 (1), Letter a) or Article 9 (2), Letter a) of the GDPR], without affecting the legitimacy of the processing based on the consent granted before its withdrawal.

You exercise your rights (including the right to raise an objection) at the personal data Controller, i.e. our Company.

The Company has no Data Protection Officer appointed; *you may contact the Company directly at the e-mail address: [gdpr@orgrez.cz](mailto:gdpr@orgrez.cz) in the matters of your personal data protection or by post to: **ORGREZ, a.s., Hudcova 321/76, 612 00 Brno – Medlánky.***

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Should you think that law or the GDPR have been breached during the processing of your personal data, you have the right to file complaint at the supervisory body; in the Czech Republic, it is:

*Úřad pro ochranu osobních údajů*

*ul. pplk. Sochora 27,*

*170 00 Praha 7*

*(Tel. +420 234 665 111; e-mail: [posta@uouu.cz](mailto:posta@uouu.cz); data box: [qkbaa2n](mailto:qkbaa2n); web pages:*

*<https://www.uouu.cz>).*

## **7. Other Purposes of the Personal Data Processing**

Your personal data shall not be further processed for other purpose than that for which they have been collected. Your personal data shall not be handed over to a third country or to international organizations.

## **8. Additional Information**

Your personal data shall be kept both in the electronic and physical form (printed). Documents in the electronic form are stored on local discs of employees' work stations. The data discs are secured by encryption and the data stored in the profile of the user verified in the computer domain of our Company. Documents in the physical form are kept in lockable drawers accessible only by the authorized persons.

Only the employees of our company who have been assigned specific tasks related to the purpose of the personal data processing have access to your personal data.

**In effect from 25/05/2018**