



AS Mintos Marketplace Privacy Policy for Applicants

APPROVED

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Document owner: Head of People

History of modifications

Version	Entry into force	Changes
1.2.	13.01.2024	Changes
1.1.	04.11.2022	Changes
1.0	29.10.2021	New document

DEFINITIONS

The following key terms, when used as capitalised terms in this Policy for applicants, shall have the following meaning:

Term	Definition
Applicant	An individual who might be of interest to Mintos as a potential employee and who has already applied for the position or has been contacted by Mintos and agreed to enter the recruitment process.
ATS	applicant tracking system which is provided by the third party to be used for recruitment of Mintos employees.
Employee	A person who has an employment contract with Mintos.
GDPR	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, i.e., General Data Protection Regulation.
Group Company	Legal persons controlled by AS Mintos Holdings, a joint stock company, registered under the laws of the Republic of Latvia, registration No. 40103902690.
Mintos	AS Mintos Marketplace, a joint stock company, registered in the Commercial Register of Latvian Enterprises on 1 June 2015 with registration No. 40103903643 which holds an investment brokerage firm licence issued by the FCMC, and other Group Companies listed in Schedule 1 of this Privacy Policy.
Personal data	Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Privacy Policy	This AS Mintos Marketplace Privacy Policy for Applicants.

1. Introduction

- 1.1. The purpose of this Privacy Policy is to determine the principles and procedure for processing Applicant's Personal data, as well as to inform the Applicants regarding how Mintos processes the Personal data about them and their rights concerning that.
- 1.2. The terminology used in this Privacy Policy such as controller, processor, processing and other terms shall have the meaning as described to it in the GDPR, unless defined in the definitions.

2. The types of Personal data

- 2.1. Mintos may process the Applicant's Personal data in the following situations:
 - 2.1.1. If Applicants provide their Personal data by submitting an application, resume, CV, motivation letter and any other documents/information added to their application or during the job interview;
 - 2.1.2. If Mintos has found the Applicant based on their public information in different social media (such as LinkedIn);
 - 2.1.3. If someone has referred the Applicant to Mintos.
- 2.2. Mintos may process the following Personal data:
 - 2.2.1. **Identification data**, for example, name, surname;
 - 2.2.2. **Personal information and family information**, for example, country of residence;
 - 2.2.3. **Contact Information**, for example, phone number, e-mail;
 - 2.2.4. **Education and occupation data**, for example, information about education, previous work experience, contact information of current/previous employer, and other work-related experience;
 - 2.2.5. **Other information** provided in CV and application;
 - 2.2.6. **Information received from the Applicant during the interview process**, for example, any kind of notes written down during the interview;
 - 2.2.7. **Background check information**, for example, information obtained through requests of feedback, and confirmation of work experience/ education.
- 2.3. Unless required by law, Mintos will not require Applicants to provide any sensitive information such as – data related to health, ethnicity, religious or political beliefs, and data about criminal convictions. If that is the case, Mintos will process that data according to this policy and with special care.
- 2.4. At the final stage of the recruitment process, if Mintos decides to extend a job offer to the Applicant, Mintos will first obtain the Applicant's consent before reaching out to third parties, such as referees, for references or additional information.
- 2.5. Mintos may process Applicants Personal data collected from the third parties:
 - 2.5.1. from public external sources, such as – LinkedIn and other public networks;
 - 2.5.2. from recruitment agencies with whom they have registered an interest to be recruited.

3. Processing and Retention of Candidate Data

- 3.1. If the Applicant proactively applies for a position, Mintos will request the Applicant's explicit consent to process their Personal Data for recruitment purposes via ATS.
- 3.2. If the Applicant is actively sourced by Mintos or referred by a third party, Applicant's publicly available Personal Data will be added to the ATS. Within 30 days, the Applicant will receive an email requesting their permission to process and retain their Personal Data for recruitment purposes. This

email will include access to this Privacy Policy and instructions on how to permit or deny further processing of the Personal Data.

- 3.2.1. If the Applicant grants permission, their Personal Data will be processed and stored for recruitment purposes for an initial period of 12 months (i.e., until the end of the recruitment process).
- 3.2.2. If the Applicant does not respond within 30 days or submits a data removal request (instructions for removal are included in the email footer), their Personal Data will be deleted:
 - (a) Within 1 month if no response is received.
 - (b) Within 1 week if a removal request is submitted.
- 3.3. Applicants' Personal Data will be stored in the ATS for an initial 12-month period.
- 3.4. After the 12-month recruitment period, Mintos will send an e-mail to the Applicant informing them that their Personal Data remains stored with the ATS for Mintos' Talent Pool:
 - 3.4.1. If the Applicant submits a removal request, their Personal Data will be deleted within 1 week;
 - 3.4.2. If no removal request is received, the Applicant's Personal Data will continue to be retained for another 12 months.
- 3.5. Independently of the above process, Mintos' People Team will conduct a manual review every 2 years of all data stored in ATS. During this review:
 - 3.5.1. If there is no ongoing recruitment activity or legitimate business reason to retain the Applicant's Personal Data, the data will be deleted or anonymized;
 - 3.5.2. Anonymized data may be used for statistical purposes only.
- 3.6. The Applicant may request the removal of their Personal Data at any time by contacting Mintos at people@mintos.com or using the Mintos ATS (accessible via the Mintos career website). Mintos will ensure data deletion within 1 week of receiving such a request unless a legal basis exists for further retention.

4. The legal basis for processing

- 4.1. Mintos processes Applicants Personal data for the reasons listed below, but mainly to ensure the recruitment process, i.e., to be able to evaluate persons fit for the job (position) they have applied for, to complete the selection procedure and, where necessary, to make a job offer, among others. In each case the legal basis for processing Applicants Personal data is one or more of the legal bases mentioned below.
- 4.2. Applicants' Personal data are processed based on their consent and Mintos legitimate interest when Applicants submit the application, resume, CV, motivation letter and any other documents added to their application or during the job interview, or when the data is collected from third parties such as LinkedIn.
- 4.3. Local laws and regulations, including the GDPR, require Mintos to process Applicants' Personal data to comply with legal or regulatory obligations, for example, to:
 - preventing illegal working;
 - complying with health and safety obligations;
 - carrying out equal opportunities monitoring;
 - assessing fitness and propriety of individuals for relevant regulatory schemes to which Mintos must adhere;
- 4.4. Local laws and regulations, including GDPR, allow Mintos to process Applicants' Personal data where it is necessary for Mintos legitimate interests as a business, for example:
 - recruitment processes (including negotiation and communicating with the Applicant concerning its application);
 - considering Applicants suitability for employment/work, taking up references, and conducting appropriate checks;
 - dealing with any legal disputes involving the Applicant;

5. 'Special categories of personal data' or 'sensitive personal data'

- 5.1. Mintos processes 'special categories of personal data' or 'sensitive personal data' only when the Applicant has submitted these data itself or when Mintos has acquired special consent from the Applicant.
- 5.2. In the case mentioned above the purpose of the processing of Applicant's sensitive Personal data is:
 - carrying out the obligations Mintos has to exercise both Mintos and Applicant's specific rights which are imposed by employment laws, including, where it is in the public interest, monitoring equality opportunities, assessing suitability for particular jobs and considering whether adjustments may need to be made to accommodate an individual with a disability;
 - establishing, bringing or defending legal claims;
 - in the case of personal data about Applicant's physical or mental health, to enable Mintos to assess Applicant's working capacity and make decisions for occupational health purposes; and
 - Applicant's criminal convictions.

6. Disclosure of Applicants Personal data to third parties

- 6.1. For the purposes set out in Section 3 above, Mintos will share the Applicant's Personal data with Mintos ATS and may share with Mintos Group Companies and in exceptional cases with the regulator (The Bank of Latvia) if the applicable laws require prior approval of the applicant's candidacy;

7. Security and storage of Applicants Personal data

- 7.1. Mintos will take reasonable steps to ensure that Applicant's' Personal data are protected from misuse, loss, unauthorised access, modification and disclosure.
- 7.2. Mintos stores all Personal data electronically on Mintos secure servers within the European Union.
- 7.3. Once Mintos has received Applicant's Personal data, Mintos will use strict procedures and security features to prevent unauthorised access.
- 7.4. The access to Applicant's Personal data within Mintos is limited to only those Mintos employees who have a good business reason to access or know this information. This is achieved through both technical solutions and physical access rights, as well as proper training and education of Mintos employees who have built appropriate safeguards.

8. Automated Decision-Making

Currently, Mintos does not engage in automated decision-making, including profiling, related to the recruitment process. If automated decision-making is implemented in the future, the Applicant will be informed and retain the right to request human intervention in decision-making.

9. Applicant Rights

The Applicant has the right to access, rectify, delete, or restrict processing of their data, as well as to data portability, allowing the Applicant to receive their Personal data in a structured, commonly used format by contacting Mintos at people@mintos.com or Mintos ATS (via Mintos career website).

10. Contact and Complaint Mechanism

For any GDPR-related inquiries, you may also contact our Data Protection Officer directly at dpo@mintos.com or Mintos People team at people@mintos.com or by post: Skanstes street 50, Riga, LV-1013, Latvia

You also have a right to complain to Data State Inspectorate (in Latvian – Datu valsts inspekcija) via info@dvi.gov.lv.

11. Responsibility, updates and control

- 11.1. This Privacy Policy shall be reviewed and renewed by the DPO once needed, at least every two years.
- 11.2. The DPO together with Mintos Head of People shall continuously monitor the effectiveness of the application of the Privacy Policy, and improve it if necessary.