

|                  |             |
|------------------|-------------|
| Version          | 1.1         |
| Date of version: | 04.11.2022. |

# mintos

## **AS Mintos Marketplace Privacy Policy for Applicants**

**APPROVED**

with AS Mintos Marketplace Supervisory Board meeting minutes No.  
LVMM/02-03-05-2022-6 of November 4, 2022

## DEFINITIONS

The following key terms, when used as capitalized terms in this privacy 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 that has already applied for the position or has been contacted by Mintos and agreed to enter the recruitment process.  |
| 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 under the laws of the Republic of Latvia, reg.No. 40103903643, and other Group Companies listed in the 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 privacy policy for candidates and applicants.   |

### 1. Introduction

- 1.1. The purpose of this Privacy Policy is to determine the principles and procedure for processing Applicants Personal data, as well as to inform the Applicants regarding how Mintos processes the Personal data about them and their rights in relation to 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 following Personal data which Applicants provide by submitting application, resume, CV, motivation letter and any other documents/information added to their application or during the job interview:
  - 2.1.1. **Identification data**, for example, name, surname;
  - 2.1.2. **Personal information and family information**, for example, country of residence;
  - 2.1.3. **Contact Information**, for example, phone number, e-mail;

- 2.1.4. **Education and occupation data**, for example, information about education, previous work experience, contact information of current/previous employer, other work related experience;
  - 2.1.5. **Other information** provided in CV and application;
  - 2.1.6. **Information received from the Applicant during the interview process**, for example, any kind of notes written down during the interview;
  - 2.1.7. **Background check information**, for example, information obtained through requests of the feedback, confirmation of work experience/ education.
- 2.2. 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.
  - 2.3. If Mintos is willing to make a job offer to the Applicant, at the final stage of the recruitment process, Mintos obtains its consent prior to contacting the third parties, such as referees, for references or further information.
  - 2.4. Mintos may process Applicants Personal data collected from the third parties:
    - 2.4.1. from public external sources, such as – LinkedIn, Facebook, Instagram, Twitter and other public networks;
    - 2.4.2. from recruitment agencies with whom they have registered an interest to be recruited.

### **3. The legal basis for processing**

- 3.1. 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 work offer, among others. In each case the legal basis for processing Applicants Personal data is one or more of the legal bases mentioned below.
- 3.2. 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.
- 3.3. 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;
  - ensuring the safety and security of our systems;
  - carrying out equal opportunities monitoring;
  - responding to government statistical monitoring;
  - assessing fitness and propriety of individuals for the purpose of relevant regulatory schemes to which we must adhere;
  - liaising with relevant tax authorities and other government entities or agencies in relation to attachments of earnings and similar deductions;
- 3.4. Local laws and regulations, including GDPR, allow Mintos to process Applicants Personal data where it is necessary for the purposes of Mintos legitimate interests as a business, for example:
  - recruitment processes (including negotiation and communicating with the Applicant in relation to its application);
  - considering Applicants suitability for employment/work, taking up references, and conducting appropriate checks;
  - dealing with any legal disputes involving the Applicant;
  - keeping our IT system safe and secure; and

- reporting to government authorities.

#### **4. 'Special categories of personal data' or 'sensitive personal data'**

- 4.1. 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 a special consent from the Applicant.
- 4.2. In the case mentioned above the purpose of the processing of Applicants sensitive Personal data are:
  - carrying out the obligations Mintos has to exercise both Mintos and Applicants 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 to consider 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 Applicants physical or mental health, to enable Mintos to assess Applicants working capacity and make decisions for occupational health purposes; and
  - Applicant's criminal convictions.

#### **5. Disclosure of Applicants Personal data to third parties**

- 5.1. For the purposes set out in Section 3 above, Mintos may share Applicants Personal data with:
  - Mintos Group Companies;
  - Mintos professional advisors (including lawyers, accountants and auditors);
  - government authorities.
- 5.2. Mintos also may share Applicants Personal data with other parties which provide products or services to Mintos:
  - to comply with Mintos overriding legal and regulatory obligations to the Applicant;
  - to ensure that Mintos comply with any contract that Mintos enter into with the Applicant; and
  - where Mintos has a legitimate interest in doing so.

#### **6. Security and storage of Applicants Personal data**

- 6.1. Mintos will take reasonable steps to ensure that Applicants Personal data are protected from misuse, loss, unauthorised access, modification and disclosure.
- 6.2. Mintos stores all Personal data provide by the Applicant electronically on Mintos secure servers within the European Union.
- 6.3. Once Mintos has received Applicants Personal data, Mintos will use strict procedures and security features to try to prevent unauthorised access.
- 6.4. The access to Applicants 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.
- 6.5. If the Applicant is not successful in its application at Mintos, but it has clearly indicated that it might be interested in other positions at Mintos, then Mintos will retain a part or all of Applicants Personal data (such as CV) for a limited period of 2 (two) years. After that period Mintos will delete or anonymize Applicants Personal data and use it only for statistical purposes.

- 6.6. If the Applicant has clearly indicated that it is not interested in other positions at Mintos, Applicants Personal data will be anonymized 3 (three) months after the end of the recruitment project, if Mintos does not have any legal basis to store Applicants Personal data for a longer period of time.
- 6.7. Background check information, such as verification of Applicants educational & professional background and criminal history checks (as permitted by applicable law) will be stored for no longer than 30 (thirty) days from when the background screening has been completed.

## **7. Notification to Applicants**

- 7.1. Mintos shall notify the Applicants regarding processing of their Personal data and their rights in relation to that. For that reason Mintos has prepared the public notification to the Applicants (Schedule 1).
- 7.2. Mintos may change the Schedule 1 time to time, upon necessity.

## **8. Responsibility, updates and control**

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

## SCHEDULE 1

### Applicant Privacy Policy

This policy describes how Mintos collects and processes the personal data of you as a job applicant, how this data is used and protected, and your rights in relation to this data.

This policy applies to applicants entering the recruitment process for a job vacancy at Mintos at Mintos.

#### Controller

The controller of your personal data is AS Mintos Marketplace, reg.No.40103903643, address: Skanstes street 50, Riga, LV-1013, Latvia.

| Your personal data  | Purpose and basis for processing of your personal data  |
|---|---|
| <ul style="list-style-type: none"> <li>- <b>identification data</b> (name, surname, etc.)</li> <li>- <b>contact information</b> (phone number, e-mail etc.)</li> <li>- <b>other information</b> provided in the CV and application;</li> <li>- <b>information received from you during the interview process;</b></li> <li>- <b>background check information</b>, for example, information obtained through requests of the feedback, data about criminal convictions.</li> </ul> | <ul style="list-style-type: none"> <li>- to ensure the recruitment process;</li> <li>- to be able to evaluate your fit for the job (position) you have applied for;</li> <li>- to comply with legal or regulatory obligations;</li> <li>- for the purposes of Mintos legitimate interests.</li> </ul> |

Unless required by law, Mintos will not require you to provide any special categories or personal such as – data related to health, ethnicity, religious or political beliefs or criminal convictions. If you choose to provide such information, or Mintos is obliged to process it, that will be done with your consent, the utmost care and will be processed according to this policy.

#### Recipients of your personal data

Mintos assures that your personal data will be kept secure and confidential, and available to only those Mintos employees who have a good business reason to access this information.

Mintos may share your personal data with Mintos Group Companies, Mintos professional advisors (including lawyers, accountants and auditors) and government authorities, as well as with other parties which provide products or services to Mintos.

#### Data retention period

Your personal data will be anonymized 3 (three) months after the end of the recruitment project, unless you have indicated that you are interested in other positions at Mintos. In that case Mintos will keep your data for 2 (two) years. Background check information will be stored for no longer than 30 (thirty) days from when the background screening has been completed.

#### Automated decision making

Your personal data processed in order to conduct the recruitment process will not be subject to automated decision making, including profiling.

#### Your rights

You have several rights regarding your personal data. These include the right to access, correct and delete your data, as well as the technical right to restrict the way in which Mintos processes and transfers the data. In the case of data obtained by Mintos on the basis of your consent - withdrawal of consent at any time without affecting the lawfulness of processing based on consent before its withdrawal; the consent may be withdrawn by writing to Mintos as indicated below. You also have a right to lodge a complaint to Data State Inspectorate (in Latvian – Datu valsts inspekcija) via [info@dvi.gov.lv](mailto:info@dvi.gov.lv).

**Contact details**

In matters related to the processing of personal data you can contact Mintos via: e-mail [people@mintos.com](mailto:people@mintos.com) or by post: Skanstes street 50, Riga, LV-1013, Latvia

**Changes**

Mintos may change this policy from time to time, upon necessity.

The version of this policy is effective as of 04.11.2022.