



Mintos Group Privacy Policy for Candidates and Applicants

APPROVED

with AS Mintos Holdings Supervisory Board meeting minutes No. LVMH/02-03-05-2021-4 of
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Document owner: Head of People

History of modifications

Version	Entry into force	Changes
1.0	29.10.2021	New document

DEFINITIONS

The following key terms, when used as capitalized terms in this privacy policy for candidates and applicants, shall have the following meaning:

Term	Definition
Applicant	A natural person who might be of interest to Mintos as a potential candidate or an employee; the person who has not been contacted by Mintos yet, but has already registered its interest via contacting Mintos and applying for the position.
Candidate	A natural person who is taken into the process of interviewing for a position at Mintos: has been contacted by Mintos and agreed to enter the interviewing & 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.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction; as defined in GDPR.

1. Introduction

- 1.1. This Privacy Policy is provided to you because you are applying to work with Mintos as an employee, or a contractor.
- 1.2. Mintos is the controller of your Personal data.
- 1.3. The aim of this Privacy Policy is to inform you regarding how Mintos processes the information about you, as well as about your rights in relation to this information.
- 1.4. This privacy Policy also sets out the legal basis for Mintos to process your personal data.
- 1.5. The terminology used in this Privacy Policy such as controller, processor, personal data etc. shall have the meaning as described to it in the GDPR.

2. What types of Personal data are processed?

- 2.1. Mintos may process the following Personal data which you provide by submitting application, resume, CV, motivation letter and any other documents/information added to your application or during the job interview:
 - 2.1.1. **Identification data**, for example, your name, surname, personal identification number, photo; Personal information and family information, for example, your data of birth, gender, information about your family members, your marital status
 - 2.1.2. **Contact Information**, for example, your address, phone number, e-mail;
 - 2.1.3. **Education and occupation data**, for example, information about your education, previous work experience, contact information of your current/previous employer, other work related experience;
 - 2.1.4. **Other information** provided in your CV and application;
 - 2.1.5. **Information received from you during the interview process**, for example, any kind of notes written down during the interview;
 - 2.1.6. **Background check information**, for example, information obtained through requests of the feedback, data about criminal convictions, confirmation of your work experience/ education.
- 2.2. Unless required by law, Mintos will not require you to provide any sensitive information such as – data related to health, ethnicity, religious or political beliefs. You shall not provide Mintos with such information that is not necessary for the initial recruitment process.
- 2.3. If Mintos is willing to make a job offer to you, at the final stage of the recruitment process, Mintos obtains your consent prior to contacting third parties, such as referees, for references or further information.
- 2.4. Mintos may process your 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 you have registered an interest to be recruited.

3. Why do we process your Personal data and what is the legal basis for processing?

We process your Personal data for the reasons listed below, but mainly to ensure the recruitment process, i.e., to be able to evaluate your fit for the position you have applied for, to complete the selection procedure and, where necessary, to make you a work offer. In each case the legal basis for processing your Personal data is one or more of the legal bases mentioned below.

We do not use your Personal data for automated decision making.

Please note that the lists of Personal data processing activities included in this section are not exhaustive, they are illustrative.

3.1. Your consent

When you apply for the vacancy - you submit the application, resume, CV, motivation letter and any other documents added to you application or during the job interview - you consent that Mintos will process your Personal data according to this Privacy policy and applicable data protection laws, including the GDPR.

3.2. Legal or regulatory obligation

Local laws and regulations require us to process the Personal data to comply with our 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;

3.3. The legitimate interest

Data protection laws, including GDPR, allows Mintos to process personal data where it is necessary for the purposes of our legitimate interests as a business, for example:

- recruitment processes (including negotiation and communicating with you in relation to your application);
- considering your suitability for employment/work, taking up references, and conducting appropriate checks;
- dealing with any legal disputes involving you;
- keeping our IT system safe and secure; and
- reporting to government authorities.

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

We process 'special categories of personal data' or 'sensitive personal data' only when you have submitted these data yourself or when we have acquired a special consent from you.

The purpose of the processing of sensitive Personal data are:

- carrying out the obligations we have to exercise both Mintos and your 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; and
- in the case of personal data about your physical or mental health, to enable Mintos to assess your working capacity and make decisions for occupational health purposes.

4. Disclosure of your personal data to third parties

4.1. For the purposes set out in Section 3 above, we may share your Personal data with:

- our Group Companies;
- our professional advisors (including lawyers, accountants and auditors);
- government authorities.

4.2. We also may share your Personal data with other parties which provide products or services to Mintos:

- to comply with our overriding legal and regulatory obligations to you;
- to ensure that we comply with any contract that we enter into with you; and
- where we have a legitimate interest in doing so.

5. Security and storage of your personal data

5.1. Mintos will take reasonable steps to ensure that your Personal data are protected from misuse, loss, unauthorised access, modification and disclosure.

5.2. Mintos stores all Personal data you provide to us electronically on our secure servers within the European Union.

5.3. Once we have received your Personal data, we will use strict procedures and security features to try to prevent unauthorised access.

5.4. The access to your Personal data within Mintos is limited to only those 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.

5.5. If you are not successful in your application at Mintos, but have clearly indicated that you might be interested in other positions at Mintos, then Mintos will retain a part or all of your Personal data (such as your CV) for a limited period of 2 (two) years. After that period Mintos will delete or anonymize your Personal data and use it only for statistical purposes.

5.6. If you have clearly indicated that you are not interested in other positions at Mintos, your 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 your Personal data for a longer period of time.

5.7. Background check information, such as verification of your 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.

6. Your rights

6.1. You have all the statutory rights regarding your Personal data as established in the data protection laws, including the GDPR, such as:

- right of access;
- right to rectification, to the extent possible;
- right to erasure (right to be forgotten), to the extent possible;
- right to restriction of processing;
- right to be informed;
- right to data portability, to the extent possible;
- right to object and right not to be subject to a decision based solely on automated processing.

- 6.2. In case of any uncertainty related to your Personal data, you are welcome to contact us: AS Mintos Marketplace, Skanstes street 50, Riga, LV-1003, e-mail: dpo@mintos.
- 6.3. If you think your privacy rights have been breached, you may lodge a complaint with the relevant public authority in the EU Member State of your residence. Contact details of such authorities can be found here: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

7. Changes

Mintos may change this Privacy Policy from time to time. Mintos may act outside the Privacy Policy if any legal obligations arise to you or under any law or regulation. You can always find the latest version of this Privacy Policy on our website.

SCHEDULE 1

MINTOS EMPLOYERS

Country	Name of entity	Registration number	Registered address
Latvia	AS Mintos Marketplace	40103903643	Skanstes street 50, Riga, LV-1013
Germany	Mintos Deutschland GmbH	HRB 206695 B	Potsdamer Platz - Kemperplatz 1/Sony Center, 10785 Berlin
Lithuania	Mintos Payments, UAB	304934707	Vilnius, Upės g. 23