

PRIVACY NOTICE FOR JOB APPLICANTS

Name of the company:	Payment, UAB
Approved on:	2023-12-20
Approved by:	Decision of the Board, dated 2023-12-20
Version:	1.
References to external rules:	<ul style="list-style-type: none">• 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)• Law on Legal Protection of Personal Data
References to internal rules:	<ul style="list-style-type: none">• Data Protection Policy
Status:	External – Public

PRIVACY NOTICE for Job Applicants

Effective since 20 December 2023

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1. INTRODUCTION

1.1. **About us.** This Privacy Notice provides the essential information on how Payment, UAB, legal entity code 305673740, registered address at Ukmergės g. 126, LT-08100 Vilnius, the Republic of Lithuania, (**Payment, we or us**) processes personal data of our job applicants (**you or the applicants**). Payment is an electronic money institution licensed by the Bank of Lithuania (for more information please visit this [website](#)). Company activities focus on providing payments services.

1.2. **Our commitment to your privacy.** At Payment, we value your privacy and are dedicated to safeguarding the confidentiality and security of your personal information. We understand the importance of maintaining the trust you place in us when you apply for a job with us. We are committed to being transparent about how we collect, use, and protect your data. While processing your data, we adhere strictly to the data processing requirements established by the European Union and Lithuania. Primarily, this entails compliance with the *Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data* (the **GDPR**). Please read this Privacy Notice carefully and do not hesitate to contact us if you have any questions regarding the processing of your personal data.

2. HOW, WHY AND WHAT DATA WE COLLECT

2.1. **How we collect your data.** We collect your data directly from you or from other persons:

- (1) *Direct collection* occurs when you submit your application, resume, or communicate with us directly during application process.
- (2) *Indirect collection* may involve obtaining data from:
 - recruitment agencies;
 - job search internet portals;

- specialized career social networks (LinkedIn);
- public sources;
- an employee of Payment if he/she recommended you for the job;
- state registers and databases;
- other third parties, e.g. persons recommending you (only if you give us your consent to contact those persons).

2.2. **Why we collect your data.** Purpose of collecting your data is to *assess your candidacy for employment at Payment, verifying your identity and eligibility to work, and fulfilling legal obligations related to the recruitment process.* We process your personal data based on at least one of these grounds:

- (1) your explicit *consent* which is expressed when you apply for a job with Payment and submit your personal data;
- (2) processing is necessary or in order to take steps at your request prior to entering into an *employment contract* with us; or
- (3) processing of your personal data is required for compliance with *legal obligations* (e.g. checking applicant's good reputation before concluding an employment contract, where such a requirement is provided for by the law).

2.3. **Types of data we collect.** We may collect the following types of your data:

Category	List of data	Legal ground
<i>General information about you as a job applicant</i>	<ul style="list-style-type: none"> • personal identity data (name, surname, date of birth, etc.) • contact details (address, telephone number, e-mail address, etc.) • details on work and professional experience (employment, employment period, job title/position, responsibilities, and achievements, etc.) • details on education (educational institution, training period, completed education and acquired qualification, etc.) • information on further periodic training (training courses attended, certificates obtained, etc.) • details on knowledge of languages • information technology skills • other competences and information provided in your CV, cover letter, letter of motivation or other application documentation 	<ul style="list-style-type: none"> • Processing necessary before entering into contract with you upon your request • Your consent
<i>References</i>	<ul style="list-style-type: none"> • feedback from a person recommending you as job applicant • contact information/details of such person 	<ul style="list-style-type: none"> • Your consent
<i>Details on assessment</i>	<ul style="list-style-type: none"> • summary of an interview with you • insights and opinions of persons carrying out the recruitment selection • your testing results 	<ul style="list-style-type: none"> • Processing necessary before entering into contract with

		you upon you request <ul style="list-style-type: none"> • Your consent
<i>Information that may be requested at the final stage of selection/recruitment process</i>	<ul style="list-style-type: none"> • identification documents data (ID card, passport data, etc.) • data on health (only when and to extend required with the applicable laws) • data on criminal records (only in the cases and to the extent they are necessary when performing the selection to a certain position and to the extent permitted by applicable laws) 	<ul style="list-style-type: none"> • Legal obligation

3. HOW WE SHARE YOUR DATA

3.1. **Whom we share your data with and why.** We may share your personal data with other persons for purposes consistent with this Privacy Notice:

- (1) other entities within our group for internal administrative purposes;
- (2) service providers and partners who assist us in the recruitment process;
- (3) legal and regulatory authorities if required by applicable laws.

3.2. **Safeguards when sharing your data.** We transfer your data to third parties only after establishing necessary legal agreements with them and ensuring that they are capable of processing personal data in compliance with the requirements of applicable personal data protection legislation. We take measures to ensure that our data processors have appropriate technical and organizational measures in place. We do not transfer your personal data outside the European Economic Area.

4. AUTOMATED DECISIONS ABOUT YOU

4.1. **Automated decision-making processes.** We may use automated processes to enhance the recruitment process, such as screening applications and preliminary assessments. These decisions are subject to review and can be discussed upon request.

5. YOUR RIGHTS AND CHOICES

5.1. **Your rights regarding your data.** You have the following right established by the GDPR:

- (1) *Right to be informed:* you have a right to be informed about your data processing, including purposed and legal grounds of processing.
- (2) *Right of access:* you have a right to get information as to whether personal data concerning you is being processed, and, if that is the case, access to your personal data and defined information about such data processing.
- (3) *Right of rectification:* you have the right to request to rectify inaccurate personal data concerning you or complete the incomplete personal data.
- (4) *Right to erasure ("right to be forgotten"):* you have the right to request the erasure of your personal data in such cases: (a) the personal data are no longer necessary; (b) you withdraw consent on which the processing is based and where there is no other legal ground for the processing; (c) you object to the processing and there are no overriding legitimate grounds for the processing; (d) your personal data has been unlawfully processed; (e) your personal data has to be erased for compliance with a legal obligation.

- (5) *Right to restriction of processing*: you have a right to request the restriction of processing of your personal data in such cases: (a) you contest the accuracy of the personal data – for a period enabling us to verify the accuracy of the personal data; (b) the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead; (c) we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise, or defence of legal claims; (d) you have objected to processing pending the verification whether our legitimate grounds override those of yours, as data subject.
- (6) *Right to data portability*: you have a right to receive the personal data you, which you have provided to us, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller in such cases: (a) the processing is based on consent or on a contract; and (b) the processing is conducted by automated means. You have a right to have the personal data transmitted directly from us to another controller, where technically feasible.
- (7) *Right to object*: you have a right to object at any time to processing of personal data concerning you which is based on legitimate interest or public interest, including profiling. Where personal data are processed for direct marketing purposes, you have a right to object at any time to such processing of personal data. You will always have a right to revoke your consent to process your personal data. If we have no other legal basis for the processing of personal data, we will cease processing of personal data immediately after the cancellation/revocation of the consent provided by you.
- (8) *Rights in relation to automated individual decision making, including profiling*: you have a right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects you.

5.2. **How you can implement your rights.** To exercise your rights regarding your personal data, please contact us using the contact information provided in this Privacy Notice. Upon receiving your written request, we will take the necessary actions to promptly and properly address your requests related to data processing. We aim to respond to your request immediately, and in any case, no later than within 1 month. In certain circumstances, such as when dealing with an exceptionally large amount of data, we may extend this timeframe by an additional 2 months. Generally, we handle all requests free of charge. However, if your request is clearly unfounded or excessive, for example, due to its repetitive nature, we may consider (a) charging a reasonable fee based on actual administrative costs, or (b) refusing to act on the request. Additionally, you have the right to lodge a complaint with the State Data Protection Inspectorate (located at L. Sapiegos str. 17, 10312, Vilnius, the Republic of Lithuania; email: ada@ada.lt). For more information, please visit their [website](#).

6. HOW WE PROTECT YOUR DATA

6.1. **Our commitment to keeping your data safe.** We take the protection of your personal data very seriously and consistently implement all necessary organizational and technical measures to ensure the confidentiality, integrity, and availability of your personal data.

6.2. **Measures we take to protect your data.** To safeguard your personal data, we undertake the following measures, including but not limited to:

- (1) documenting all processing of personal data in data security policies and procedures;
- (2) clearly defining internal roles and responsibilities related to the processing of personal data;
- (3) ensuring access control, change management, and asset management;

- (4) prior to engaging third parties as data processors, we define, document, and reconcile all necessary formalities with such data processors;
- (5) establishing basic procedures to be followed in the event of an incident or personal data breach to ensure the necessary continuity and availability of personal data processing by IT systems;
- (6) ensuring that all employees understand their responsibilities and obligations regarding the processing of personal data;
- (7) implementing measures for the protection of servers, databases, workstations, and network and software security;
- (8) applying backups and data recovery practices to mitigate the risk of data loss or unauthorized access.

7. DATA RETENTION

- 7.1. **Why we retain your data.** We retain your data for specific purposes outlined in this Privacy Notice and as required by law. One reason for retaining your information is to ensure that we can provide you with the services you expect from us effectively. Additionally, we may retain your data to comply with legal obligations, resolve disputes, enforce agreements, and protect our rights.
- 7.2. **How long we keep your data.** We keep data in a form, which permits identification of data subjects for no longer than it is necessary for the purposes for which personal data is processed (*storage limitation principle*). As a general rule we store data for the period up to 2 years after the termination of selection/recruitment process unless specific retention limits are defined in legal acts. We ensure that data, which retention period is completed, is no longer processed. At the end of the defined retention period, we either destroy personal data or anonymize it.

8. UPDATES TO OUR PRIVACY NOTICE

- 8.1. **How we notify you of changes.** We reserve the right to update this Privacy Notice periodically. In the event of the event of any changes to this Privacy Notice, we will notify you in advance and publish the updated version on our website.
- 8.2. **Your right to review updates.** You have the right to review any updates and changes made to our Privacy Notice. We encourage you to regularly check our website for the latest version of our Privacy Notice. If you have any questions or concerns about the updates, please do not hesitate to contact us.

9. CONTACT US

- 9.1. **How to reach us with questions or concerns.** If you have any questions, concerns, or requests regarding our privacy practices or the information outlined in this Privacy Notice, please feel free to contact us. You can reach us by e-mail info@paymont.eu or by phone at +420 296 187 870

10. FINAL PROVISION

- 10.1. This Privacy Notice for Job Applicants, its amendments or supplements enter into force upon their approval by the decision of Board, unless it specifies another date of entry into force of the Privacy Note for Job Applicants, its amendments, or supplements.
- 10.2. The Privacy Notice for Job Applicants is reviewed annually or more frequently in case an immediate need (e.g., in case of legislative changes) is determined.

- 10.3. Information published on www.paymont.eu as https://www.paymont.eu/wp-content/uploads/2022/07/Privacy_Policy_2022_07_15.pdf shall be replaced on the day of approval of this Privacy Notice for Job Applicants, Privacy Notice for Customers and Privacy Notice for Employees by the Board.