

## **PRIVACY NOTICE FOR JOB APPLICANTS**

### **1. WHAT IS THE PURPOSE OF THIS DOCUMENT?**

This privacy notice is issued on behalf of Loucoullos Hotels Ltd and the company CHI Management Ltd (the “Companies”, “we”). Please note that the controller of your personal data shall be the Companies.

This means that we are responsible for deciding how we keep and use personal information about you. This privacy notice describes how we collect and use personal information about you during the recruitment process, before and after your employment with us, in accordance with the General Data Protection Regulation (GDPR).

This notice applies to job applicants. We may amend this privacy notice at any time.

It is important that you read this statement together with any other notice we may provide in specific circumstances when we collect or process information about you, so that you are aware of how and why we use such information.

You may contact us at the following address and phone numbers:

#### **Cleopatra Hotel**

Address: 8 Florinis street, 1065 Nicosia

Telephone: +357 22844000

Email: [manager@cleopatra.com.cy](mailto:manager@cleopatra.com.cy)

### **2. HOW WE COLLECT YOUR PERSONAL INFORMATION**

We collect personal information relating to you through the recruitment process, either directly from you or sometimes from recruitment offices, through temporary recruitment or through internet platforms.

We can sometimes collect additional information from third-parties, including former or existing employers, with your consent.

### **3. HOW WE USE PERSONAL INFORMATION RELATING TO YOU**

We may use your personal information for the following purposes:

- When you have consented to the processing of your personal information.
- Where we need to perform the contract, we have with you.
- When we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or a third-party) unless the protection of your own legitimate interests or individual freedoms prevails.

In rare occasions, we may also use your personal information for the following purposes:

- When we need to protect your interests (or the interests of a third party)
- When it is needed for reasons of public interest.

#### 4. TYPE OF PERSONAL INFORMATION WE HOLD RELATING TO YOU

Personal data or personal information means any information relating to a living person.

There are also special categories of sensitive personal data which require a higher level of protection.

We will collect, store and use the following categories of personal information about you for the purposes explained below:

Purpose	Examples of personal data that may be processed	Legal basis for processing
<p>Management of the recruitment process and decision regarding your employment.</p> <p>Evaluation of experience and qualifications in relation to the requirements of the position for which you are applying</p>	<p>Information collected during the recruitment process, contact details, identity and passport details. Date of birth, nationality, training or professional training certificates and evidence, previous employment documents (including full name, nationality, identity and passport number, date of birth, address, telephone number, email, profession, gender, training, previous employment) copy of driving licence.</p> <p>References and other information included in a CV or a cover letter as part of the application process, possible checks that we can perform to check the provided information, or history check and, if necessary, any information relating to your health, and relating to disabilities and any work adjustments.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests</p>
<p>Communicating with you or others on your behalf</p>	<p>Your address and phone number, information relating to communication in case of an emergency and information relating to your relatives, including information relating to your family and the number of dependent persons.</p>	<p>Legal obligation</p> <p>Legitimate interests</p>
<p>Your employment contract, including start date, performance and change of the contract</p>	<p>Information relating to contracts, including remuneration and other allowances, such as subsidy, the remuneration history, participating in pension arrangements. Information relating to your work position or the place of work.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests</p>
<p>Remuneration management</p>	<p>Information about your bank account, your pension contributions, your tax identity and social insurance contributions.</p> <p>Information relating to your participation, holidays and other leaves and sick leave.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate Interests</p>

Arrangements relating to trade union rights	Details regarding the trade union membership where we are required to contact trade unions and ensure that you will receive the necessary rights.	Contract
Everyday work related activities, including marketing and customer relations.	Information regarding the work you are doing for us, your role and your contact details, including your customer relation with existing or potential customers.  This may include your photograph for internal or external use.	Legitimate interests

### What happens if you do not provide us your personal data

If you do not provide your personal data that is necessary for us to evaluate your application for employment, this will not allow us to proceed and evaluate your application.

### Change of purpose

We will use your personal data only for the purposes for which we collected it, unless we reasonably consider that we need to use it for another purpose and this purpose is compatible with the initial purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

## 5. TRANSFER OF YOUR PERSONAL INFORMATION TO THIRD PARTIES

As part of the recruitment process, we share your personal information with third parties, such as for example partners and/or client companies and/or our external advisors and/or legal advisors in case there is, for example, the possibility of a legal action.

Third parties include service providers (including contractors and authorized representatives). The following third party service providers process your personal information for the following purposes:

Third Party	Purpose
IT, Legal advisors	Storage and management of files, provision of legal services

Your personal data is not transmitted to third countries (countries outside the European Economic Area (EEA)).

## 6. DATA STORAGE AND SECURITY

We store your personal information received during the recruitment process for as long as necessary to fulfil the purpose for which the processing is carried out, that is the job hiring process.

**Loucoullos Hotels Ltd (Cleopatra Hotel)**

Florinis 8, 1065 Nicosia

**Website:** [cleopatrahotel.com.cy](http://cleopatrahotel.com.cy) **Email** [manager@cleopatra.com.cy](mailto:manager@cleopatra.com.cy)

Furthermore, we retain the personal data of non-successful applicants for a period of one year, for conducting internal and/ or external audits as required by the legislation, taking into account the various legal obligations to which the Companies are subject under the applicable legal regime. This period may be extended in case legal proceedings are pending or otherwise provided for by the applicable law.

After a reasonable period, your personal data will be destroyed.

We take all necessary security measures to safeguard your personal data and protect it from possible leakage. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

We further take measures so that this is accessed only by persons who need to have access to it. Persons who have access to your personal data have a duty of confidentiality to the Companies.

## 7. YOUR RIGHTS

### Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### Your rights under the Regulation are the following:

(a) right of access to your personal data (article 15): According to this right, you may receive free of charge information and/or copies of the personal data we hold concerning you.

(b) right to rectification of your personal data (article 16): According to this right, you may at any time request that your data be rectified or completed.

(c) right to erasure («right to be forgotten») (article 17): According to this right, you may request that we erase the data concerning you.

However, we reserve the right to refuse erasure in case the processing is necessary to comply with our legal obligations, for reasons of public interest and/or for the assertion of legal claims.

(d) right to restriction of processing of your personal data (article 18): According to this right, you may request us to restrict the processing of your data when you contest its accuracy, the lawfulness of its processing and/or on the ground that it is not necessary for the purposes of the processing for which it was collected.

(e) right to data portability (article 20): According to this right, you may receive the data concerning you in a structured, commonly used and machine-readable format to transfer it to other organisations/companies or ask us to do so directly to other organisations/companies on your instructions.

(f) right to object (article 21): You have the right to object at any time to the processing of your personal data, including profiling, which is done based on legitimate and/or public interest (article 6 (1) (e) and (f)) where you consider it justified on grounds of a particular situation concerning you. If you do not agree, the Companies will no longer process your personal data, unless they demonstrate compelling and

legitimate grounds which override your interests, rights and freedoms or if the processing serves to establish, exercise or uphold legal claims.

(g) right to withdraw consent: you have the right to withdraw your consent to the processing of your personal data at any time. In such case, the processing that preceded the revocation/withdrawal of your consent is not affected and is entirely lawful.

Please note that the above rights are subject to the restrictions provided for in the Regulation.

If you wish to exercise any of the above rights or if you have any questions about how your personal data is processed, please do not hesitate to contact us through the person in charge of personal data issues whose contact details are specified on the first page of this statement.

### **What we may need from you**

We may need to ask you for certain information to help us confirm your identity and to ensure your right to access your information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who is not entitled to receive it.

## **8. CONTACT DETAILS & RIGHT TO SUBMIT A COMPLAINT**

If you wish to submit a complaint about the way we process your personal data, you can also contact us, we will investigate your complaint and work with you to resolve it. In addition, you have the right to submit a complaint with the Commissioner for Personal Data Protection of Cyprus at the email address [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy) or by phone +357 22818456 or at the office at 1 Iasonos street, 2nd floor, 1082 Nicosia.

You may contact us as follows:

*8 Florinis street,*

*1065, Nicosia*

*Tel. +357 22844000*

*Fax: +357 22844222*

*Email: [manager@cleopatra.com.cy](mailto:manager@cleopatra.com.cy)*