



PERSONAL DATA PROCESSING NOTICE TO APPLICANTS AND OTHER DATA SUBJECTS INVOLVED IN THE RECRUITMENT PROCESS

INFORMATION ON THE CONTROLLER FOR PROCESSING PERSONAL DATA AND FOR COMMUNICATION ON PERSONAL DATA PROTECTION ISSUES

SIA "Rīgas nami", registration No 40003109638, registered address: Rātslaukums 5, Rīga, LV-1050 Tel: +371 66957267, e-mail: rigasnami@rigasnami.lv

Uldis Sīpols, personal data protection specialist at SIA "Rīgas nami", can be contacted on data protection issues by calling +371 26658265 or writing to rndatuspec@rigasnami.lv. Please be advised that the above-mentioned forms of communication with the personal data protection officer of SIA "Rīgas nami" are not intended for requests for information in the exercise of your rights as a data subject.

A GENERAL DESCRIPTION OF OUR PROCESSING OF PERSONAL DATA

This notice provides information on how we process the personal data of candidates (applicants) for vacant positions and of other persons whose data we may hold in connection with recruitment.

The purpose of this notice is to provide a general overview of our processing activities and purposes, but please note that other documents published [on www.rigasnami.lv](http://www.rigasnami.lv) may also contain additional information on the processing of personal data.

This is the current version of the notice and we reserve the right to amend and update this notice as necessary.

We recognise that personal data is an asset and will process it in a way that respects your privacy and ensures the security of the personal data we hold about you.

PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

We will only process and use your personal data collected in accordance with the legitimate purposes as defined above, including:

(a) for the staff selection process and the exercise of the rights and obligations arising therefrom

For this purpose, we obtain CVs (curriculum vitae) and accompanying documents from applicants, public recruitment portals if the applicant has publicly posted his/her CV on these portals, and recruitment service providers; we contact the applicant and references identified by the applicant. With the applicant's consent, we will keep the CV for the purpose of considering the applicant's candidature for other vacancies; if necessary, to respond to claims or to defend our interests in legal proceedings.

The minimum personal data we require for these purposes are: the applicant's name, contact details (e-mail, telephone number), education and qualifications acquired, a description of previous work experience, preferably persons who can provide feedback on the applicant's professional activities (with the name and contact telephone number of the referee; we do not require any other data on the referee) and other information that may be relevant for the performance of the duties of the vacant post and for the identification of the most suitable applicant.

Please note that for the purpose of assessing an applicant, we do not ask for your personal identification number, information about your marital status or other sensitive information not related to the vacancy and your professional skills, and that you are not required to provide such information in your CV and application letter. In case we need to obtain additional information and documents proving your education and skills, we will ask you to provide the necessary documents separately.

The main legal bases for these purposes are:

- consent (Article 6(1)(a) of the General Data Protection Regulation¹) - for submitting a CV and for the retention of CVs in case of other vacancies;
- the conclusion of a contract with the data subject (Article 6(1)(b) of GDPR) - for the processing of applicants for whom the decision to conclude an employment contract has been taken;
- legal obligations (Article 6(1)(c) GDPR) - in individual cases for certain types of data, where the legal or regulatory framework establishes minimum requirements for a specific position;
- the legitimate interests of the controller (Article 6(1)(f) GDPR) - in relation to the provision of evidence, in the event of possible claims, and in relation to the amount of information requested.

b) To conclude an employment contract

For this purpose, we will ask you to provide the data necessary for inclusion in the employment contract and its annexes, for your identification, for verification of your qualifications and for drawing up the employment contract.

The minimum amount of personal data we need for these purposes is: employee's name, surname, personal identification number, place of residence, telephone number and other contact details, place of work, employee's educational data, employee's qualification data, job description, job title, salary, salary account number; mandatory (first) health check data.

The main legal bases used to achieve these purposes are:

- the conclusion of a contract with the data subject (Article 6(1)(b) of the GDPR);
- legal obligations (Article 6(1)(c) GDPR) - regarding the information to be reflected in the employment contract and the necessary qualification requirements, as well as reporting the fact of employment to public authorities (e.g. the National Revenue Service);
- the performance of the controller's duties and the exercise of rights in the field of employment (Article 9(2)(b) GDPR) - for the processing of special categories of data (health data).

HOW WE OBTAIN YOUR PERSONAL DATA

We may obtain your personal data in one of the following ways:

- from your application and CV for a job vacancy or for the purpose of finding a job or traineeship;
- from public recruitment portals if you have publicly posted your CV on these portals;
- from the recruitment service provider;
- from the applicant who has provided your personal data for the purpose of receiving feedback about them;
- in the process of entering into a reciprocal agreement, by obtaining data from you;
- from you if you submit an application, send us an email or call us;
- from you if you provide information or feedback about the applicant.

ACCESS TO YOUR PERSONAL DATA

We take appropriate measures to process your personal data in accordance with the legal enactments and ensure that your personal data is not accessed by third parties who do not have a legal basis for processing your personal data.

Your personal data can be accessed as necessary by:

- our employees or persons directly authorised by us in connection with the performance of their duties;
- processors of personal data in accordance with the services they provide only to the extent necessary for that purpose;
- state and local authorities in cases provided for by law.

PARTNERS IN THE PROCESSING OF PERSONAL DATA OR PROCESSORS OF PERSONAL DATA

We take steps to ensure that your personal data is processed, protected and transferred to data processors in accordance with the relevant legislation and we choose our data processors carefully.

¹REGULATION (EU) 1 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL/ROPA PARLAMENTA UN PADOMES REGULA (ES) 2016/679 of 2016 April 2016/679 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 27/EC (General Data Protection Regulation);

When we make a transfer of personal data, we assess the need for the transfer and the amount of data to be transferred. The transmission of data to processors is carried out in compliance with the requirements of confidentiality and secure processing of personal data.

Currently, we can work with the following categories of data processors:

- 1) legal advisers;
- 2) owners/developers/technical maintainers of information technology infrastructure, databases;
- 3) security/protection service providers;
- 4) other persons involved in the controller's recruitment process.

Personal data processors may change, so changes will be made to this notice.

TRANSFERS OF YOUR PERSONAL DATA OUTSIDE THE EUROPEAN UNION (EU) OR THE EUROPEAN ECONOMIC AREA (EEA)

We do not transfer data to countries outside the European Union or the European Economic Area.

RETENTION OF YOUR PERSONAL DATA

The retention periods of your personal data are determined in accordance with the purposes for which the personal data are processed and in accordance with the requirements of applicable law.

When assessing the duration of the retention of personal data, we take into account the applicable legal requirements, the performance of contractual obligations, your instructions (e.g. in the case of consent), as well as our legitimate interests. If your personal data is no longer necessary for the purposes specified, we will delete or destroy it.

For example, we will keep CVs and other supporting documents submitted for a particular vacancy until the end of the competition and thereafter, but for no longer than six months. If your candidature is shortlisted for further rounds of competition, your CV and other supporting documents will be attached to the recruitment file and kept in accordance with the requirements of external laws and regulations and internal rules.

However, if you have submitted your CV and accompanying documents without addressing them to a specific vacancy, or if you have given your consent to the use of your CV and accompanying documents for other vacancies, your personal data will be stored for one year. You always have the right to withdraw your consent to the storage of such data.

If you are offered a contract of employment, your CV and accompanying documents will be added to your personnel file and kept for the duration of the contract and thereafter in accordance with the requirements of external laws, regulations and internal rules.

YOUR RIGHTS AS A DATA SUBJECT IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA

Updating personal data

If there have been any changes to the personal data you have provided to us, please contact us and provide us with the updated data so that we can meet the purposes of processing your personal data.

Your right to access and rectify your personal data

In accordance with the provisions of the General Data Protection Regulation, you have the right to access your personal data held by us, to request its rectification, erasure, restriction of processing, to object to the processing of your data, as well as the right to data portability in the cases and in the manner provided for in the General Data Protection Regulation.

We respect these rights and, in the event of your request, we will respond within the time limits set out in the laws and regulations (no later than one month).

You can exercise your rights as a data subject in any of the following ways:

- 1) by submitting an application in person and identifying yourself at our office (address Rātslaukums 1050, Rīga, LV-8.30-16.00, (entrance from Svaru iela), every working day 8.30 - 16.00);
- 2) by sending an application by post to: Rātslaukums 5, Rīga, LV-1050

by sending an application signed with a secure electronic signature and containing a time stamp to our email address: rigasnami@rigasnami.lv.

Upon receipt of your submission, we will assess its content and the possibility of identifying you and, depending on the situation, we reserve the right to ask you to identify yourself further in order to ensure the security of your data.

WITHDRAWAL OF CONSENT

If the processing of your personal data is based on your consent, you have the right to withdraw it at any time. However, we inform you that withdrawal of consent may not affect the processing of personal data that is necessary to comply with the requirements of laws and regulations or that is based on a contract, our legitimate interests or other grounds for lawful data processing set out in laws and regulations.

You may also object to the processing of your personal data where the processing is based on legitimate interests.

LODGING A COMPLAINT IN RELATION TO THE PROCESSING OF PERSONAL DATA

If you have any questions or objections regarding our processing of your personal data, please contact us in the first instance (email: rndatuspec@rigasnami.lv) in order to mutually agree and resolve the issues.

If you believe that we have not been able to resolve the issue and you believe that we have violated your right to the protection of personal data, you have the right to lodge a complaint with the Data State Inspectorate. You can find sample applications to the Data State Inspectorate and other related information on the website of the Data State Inspectorate <https://www.dvi.gov.lv/lv/iesniegumu-paraugi>.

PERSONAL DATA FOR AUTOMATED DECISION-MAKING

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

Updated on 01.03.2023.