

APPROVED
SIA "Rīgas nami"
August 20, 2024
board meeting no. VP/RN-2024-34/1.3-1

**INTERNAL RULES
SIA RĪGAS NAMI
PERSONAL DATA PROCESSING NOTICE FOR APPLICANTS
AND OTHER DATA SUBJECTS INVOLVED IN THE RECRUITMENT PROCESS
Rīga**

August 20, 2024

no. RN-2024-5-pol/2.1-2

*Developed in accordance with the General Data Protection Regulation
and the laws and regulations in force in the Republic of Latvia
in the field of data protection of natural persons*

**INFORMATION ABOUT THE DATA CONTROLLER AND FOR COMMUNICATION ON
PERSONAL DATA PROTECTION ISSUES**

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

You can contact Uldis Sīpols, Personal Data Protection Specialist of SIA Rīgas nami, regarding data protection issues by calling +371 26658265 or by writing to rndatuspec@rigasname.lv. Please note that the above-mentioned methods of contact with the Personal Data Protection Specialist of SIA Rīgas nami are not intended for requests for information in the exercise of your rights as a data subject.

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 other persons whose data may come into our possession in the context of 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.rigasname.lv may also contain additional information on the processing of personal data.

This is the current version of the notice, we reserve the right to amend and update this notice as necessary. We understand that the personal data is your asset and we process it in conformity with the confidentiality requirements while caring for the safety of your personal data in our possession.

PURPOSES AND LEGAL BASIS FOR PROCESSING OF PERSONAL DATA

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

a) To support the recruitment process and the exercise of our 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 consent of the applicant, we keep CVs for the purpose of considering the candidacy of the applicant for other vacancies; if necessary, to respond to claims or to defend our interests in legal proceedings.

The minimum amount of personal data we need for these purposes is: name, surname, contact details (e-mail, telephone number), education and qualifications acquired, description of the previous work experience of the applicant, preferably persons who can provide feedback on the professional activities of the applicant (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 position and the identification of the most suitable applicant.

Please note that for the purpose of assessing an applicant, we do not ask for your personal identity number, information about your marital status and other sensitive information not related to the vacant position and your professional skills, so 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 basis to achieve these purposes are:

- consent (Article 6(1)(a) of the ¹General Data Protection Regulation) – for the fact of submitting your CV and for the retention of your CV in case of other vacancies;
- conclusion of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation) – for the processing of the data of applicants for whom the decision to conclude an employment contract has been taken;
- legal obligations (Article 6(1)(c) of the General Data Protection Regulation) – in individual cases for certain types of data, where the laws and regulations lay down minimum requirements for a specific position;
- legitimate interests of the controller (Article 6(1)(f) of the General Data Protection Regulation) – in relation to the provision of evidence, in the event of possible claims, as well as in relation to the scope of the information requested.

b) For the conclusion of 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 the drawing up of the employment contract.

The minimum amount of personal data we need for these purposes is: name, surname, personal identity number, place of residence, telephone number and other contact details, place of work, education data, qualification data, description of the duties to be performed, position, remuneration, account number; compulsory (first) medical examination data of the employee.

The main legal basis used to achieve these purposes are:

- the conclusion of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation);
- legal obligations (Article 6(1)(c) of the General Data Protection Regulation) – 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 State Revenue Service);

¹ 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)

- performance of the duties and exercise of the rights of the controller in the field of employment (Article 9(2)(b) of the General Data Protection Regulation) – for the processing of special categories of data (health data).

OBTAINING 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 searching for a job or internship;
- from public recruitment portals if you have publicly posted your CV on these portals;
- from the provider of the recruitment service;
- from an applicant who has provided your personal data for the purpose of receiving references about him/her;
- in the process of entering into a contract with each other, by obtaining data from you;
- from you if you submit an application, send us an e-mail or call us;
- from you if you provide information or feedback about an applicant.

ACCESS TO YOUR PERSONAL DATA

We take appropriate measures to process your personal data in accordance with the law and ensure that your personal data is not accessed by third parties who have no legal basis for processing your personal data.

Your personal data can be accessed, if necessary, by:

- our employees or directly authorised persons for whom it is related to the performance of their duties;
- processors of personal data in accordance with the services they provide, only to the extent necessary for that purpose;
- national and local authorities in the cases established by law.

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

We take measures to ensure the processing, protection and transfer of your personal data to data processors in accordance with applicable laws, and carefully select data processors.

When making a transfer of personal data, we assess the necessity and the amount of data to be transferred.

Data transfers

to processors are performed in compliance with the requirements of confidentiality and secure processing of personal data.

At the moment, we can cooperate with the following categories of data processors:

- 1) legal advisors;
- 2) information technology infrastructure, database owners/developers/technical maintainers;
- 3) security assurance/protection service providers;
- 4) other persons involved in the provision of the recruitment process of the controller.

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

TRANSFER 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.

STORING OF YOUR PERSONAL DATA

The storage 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 storage of personal data, we take into account the applicable laws and regulations, 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 documents submitted for a specific vacancy until the end of the recruitment and thereafter, but no longer than six months. If your application is shortlisted for further rounds of recruitment, your CV and other accompanying documents will be added to the recruitment dossier and stored in accordance with the requirements of external laws and regulations and internal rules.

On the other hand, 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 recruited, your CV and the documents attached to it will be added to your employee file and kept for the duration of the contract and thereafter in accordance with the requirements of external laws and regulations and internal rules.

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

Update of personal data

If there are 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 achieve 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 have it rectified, deleted, to restrict its processing, to object to the processing of your data, as well as the right to data transfer in the cases and in the manner provided for in the General Data Protection Regulation.

We respect these rights, therefore, in case of your request, we will respond within the time limits established by the laws and regulations (no later than within one month).

You may 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 5, Riga, LV-1050, (entrance from Svaru iela), every working day from 8.30-16.00);
- 2) by post to: Rātslaukums 5, Riga, LV-1050.
- 3) by sending an application signed with a secure electronic signature and containing a time stamp to our e-mail address: rigasnami@rigasnami.lv.

Upon receipt of your application, 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 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, please be advised that the withdrawal of consent cannot 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 basis for lawful processing set out in laws and regulations.

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

LODGING OF COMPLAINTS IN RELATION TO THE PROCESSING OF PERSONAL DATA

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

If you believe that we have not been able to resolve the issue mutually and you believe that we are violating your right to the protection of personal data, you have the right to lodge a complaint with the Data State Inspectorate. You can find templates for 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.