

## **Mission Statement**

Our mission is to protect your data, as we value your privacy as our organisation's top priority. Subsequently, our key objectives are to sustain privacy protections as well as maintain your trust and confidence when processing your personal data information. This Privacy Statement/Notice serves the purpose of describing how we may collect, use and store the information provided by you when you apply for a job position to our organisation.

## **Recruitment Privacy Notice**

*Kaizen Gaming (Stoiximan / Betano), a company organized and existing under the Laws of Malta, with company registration No. 43209 and registered office at Flat B8, 'The Atrium', West Street, Msida, MSD 1731, Malta, and KAIZEN DIGITAL SERVICES S.A. a company organized and existing under the Laws of Greece, with company registration No. 18559839000 and registered office at 40.2 Km of the Attica Road, Postal Code 19002, in Paiania, Attica, Greece, as well as all of our associated companies in the group which may be involved in the data processing of the herein referred purposes may be considered as per case (joint) controllers. (“We”, “Us”). We are all committed to protecting and respecting your privacy and all of our companies follow the group's data protection policies and procedures keeping data protection at the highest standards. This Privacy Notice, together with any other documents referred to herein, sets out the overall framework under which any personal data collected from you and/or are provided to us, will be processed in correlation to the corresponding resourcing and recruitment practices.*

This Privacy Notice only applies to the personal data of job applicants, potential candidates for employment, as well as to our recruitment programs, campaigns and events. It does not apply to our employees, contractors or clients, or other personal data that the company collects for any other purposes.

As used in this Privacy Notice, the term “personal data” encloses the information that identifies job applicants and potential candidates for employment with us, that is being submitted either within the context of the online application and/or through any other alternative channels (e.g. via professional recruiting firms).

Personal data includes sensitive personal information which refers to ethnicity, health, trade union membership, political/philosophical beliefs, sexual orientation, as well as any other categories, as prescribed by law. We will not seek to obtain and will not collect such data on a candidate, unless permitted to do so by applicable laws. **Please make sure that you do not include in your application any information related to sensitive data.**

We will process your personal data in accordance with this Privacy Notice, unless such processing conflicts with the requirements of applicable law, in which case, applicable law will prevail.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. For the purpose of the General Data Protection Regulation (“GDPR”) the Data Controller is We.

## Your Personal Information

### **Information we collect from you**

We collect and process the following types of information:

- Information provided at and during the application for a role. This includes information provided through an online job site (e.g. LinkedIn), via email, through in-person interviews and/or by any other method, e.g. contact details, areas of interest, CV, experience, education, academic and professional qualifications;
- Any other online documentation (such as website or portfolio)

- Any other information that you will provide voluntarily to us such as photo;
- Identification data / documents for facilitating travel arrangements and/or for reasons of ensuring the Right To Work;
- A record of any correspondence;
- Answers to questions relevant to the role you have applied for and help us evaluate your suitability for the job
- A record of your screening progress through our hiring process;
- Information provided as part of interviews and assessments
- Pre-employment screen information, e.g. reference letters
- From visits to our website, indicatively traffic data, location data, weblogs and other communication data, referral site and the accessed resources
- Your correspondence in online surveys and or candidate research that we carry out

### **Information we create in connection with you**

- Assessment results and feedback
- Business cases / Technical assignments to further evaluate your candidature
- Business cases / Technical assignments to further evaluate your candidature
- Offer details

### **Information we collect from other sources**

Recruitment services partners may facilitate the correlation of the data you provide to us, with other publicly available information about you that you have published on the Internet – this may include sources such as professional social media networks (e.g. LinkedIn).

We may receive personal data about you from a third party who recommends you as a candidate for a specific job opening or within the overall context of the industry we address.

We may receive your personal data from a services provider assisting us in the recruitment process, e.g. data derived from the results of an evaluation test.

## Uses Made Of Your Information & Lawful basis for processing

We process personal data to:

- Attract talent and market opportunities at company including by arranging, hosting and participating in events, marketing and advertising opportunities and using recruitments to help find talent for us:
- Identify and resource talent including searching our existing talent pool and publicly available sources, such as professional social media and job websites of which you are a member:
- Process and manage applications for roles at our company, evaluate you for open positions that match your interests and working experience, manage your candidate profile, send you email notifications and other announcements, request additional information or otherwise contact you about your candidacy:
- Conduct statistical analyses and create reports regarding the improvement of our recruitment and employer branding processes;
- Assess your application on a role for which you have applied or with respect to other roles;
- Communicate with you about the recruitment process;
- Correlate any information that we receive from you with information obtained from third party data providers;
- Protect our legal rights and comply with our obligations to the extent authorized or permitted by law;
- Ensure compliance with legal requirements, including diversity and inclusion requirements and practices;

We rely on legitimate interest as the lawful basis on which we collect and use your personal data, either directly to our HR or via recruitment platforms (e.g. Glassdoor, Indeed). Our legitimate interests are the recruitment of competent and appropriate staff for our business, that also constitute values fit to our organisation. You are not required to provide any requested information to us,

but failing to do so could result in the ending of the assessment process of your candidacy, if we fail to continue with your assessment.

We may wish to retain your personal data to consider you for future employment opportunities. In such an event, you will specifically be informed prior to your application and you will have the right to object to such a processing. Your consent will be required for contacting you regarding job openings that might not be relevant to the one you have applied for. Also, we will require your consent so as to be part of one of our recruiting events/campaigns/surveys or our newsletter list or seasonal communication, with his communication being absolutely optional.

#### Disclosure of Your Information

We may use third parties to assist us with our recruitment process, especially in identifying the recruiting talent, administering and evaluating pre-employment screening and testing and improving our recruiting practices. In principle, these parties are considered as being the data processors, being only entitled to process your personal data in accordance with our instructions.

When you apply for a job opening via the application function on a job site or similar online service providers, indicatively Workable, LinkedIn, Indeed, you should note that the relevant Partner may retain your personal data and may also collect data from us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner's Privacy Notice.

We follow processes designed to ensure that any processing of personal data by third party service providers is consistent with this Privacy Notice and protects the confidentiality, availability and integrity of your personal data. Where required by law, we put in place legal mechanisms designed to ensure adequate data protection of your personal data in a third country.

Finally, we may disclose or transfer your personal data in the event of a reorganization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

## How We Store Your Personal Data

### **Security**

We take all appropriate measures to ensure that all personal data is secure, including security measures that prevent personal data from being accidentally lost, or used or accessed in any unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

However, as the transmission of information on the Internet cannot be fully secured, despite the fact that we do our best to protect your personal data, we cannot guarantee their security and therefore their transmission will have to remain at your own liability.

## **Where We store your personal data**

Your personal data is stored on secure servers within the EU, EEA, or where there is a regime with equivalent level of protection.

## **How long we keep your personal data**

We will keep your personal data only if there is a business need. In principle, we follow the policy of retaining personal data of unsuccessful candidates that could fit to other positions and/or as a talent pool for future opportunities for a period that is not exceeding 2 years from the job application date.

If you accept an offer of employment by us, any relevant personal data collected during your pre-employment period will become part of your personnel records and will be retained in accordance with our Employees Privacy Policy.

Your personal information will be deleted on any of the following occurrences:

- In reasonable time after the lapse of the retention period as referred above
- Upon your objection to such processing
- Upon a written request by you to erase your personal data, via mail to [dpo-office@stoiximan.gr](mailto:dpo-office@stoiximan.gr) and [careers@kaizengaming.com](mailto:careers@kaizengaming.com).

See section below for more information.

## **Your rights**

Under the applicable data protection regulations, you have a number of important rights free of any obligation. In summary, those include your right to:

- Access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address

- Request the correction/updating with respect to your personal information
- Request the erasure of personal data concerning you in certain situations
- Receive the personal data concerning 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 a third party in certain situations
- Object at any time to any processing of personal data concerning you
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- Withdraw your consent without detriment
- Otherwise restrict our processing of your personal data in certain circumstances
- File a complaint to competent regulatory authority and/or claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see EU Guidance on data protection here:

[https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules\\_en](https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules_en)

If you would like to exercise any of those rights, please contact us using our Contact details below, providing we have:

- enough Information to identify you, i.e. your full name and your personal email address.
- proof of your identity and address
- information to which your request relates

### **How to complain**

We hope that we can resolve any query or concern you raise about our use of your information.

The applicable legislation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

You may find below the supervising authorities per country:

**Malta:** Office of the Information and Data Protection Commissioner (<https://idpc.org.mt/en/Pages/Home.aspx>), telephone: (+356) 2328 7100, and mail address: Floor 2, Airways House, High Street Sliema, SLM 1549, Malta.

**Greece:** Hellenic Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)) telephone: +30-210 6475600, and mail address: Kifisias Avenue 1-3, Zip code: 115 23, Athens, Greece.

**Germany:** Each state has its own data protection authority. So please refer to your case.

**Portugal:** Comissão Nacional de Protecção de Dados (<https://www.cnpd.pt>), telephone: : (+ 351) 21 392 84 00 and mail address: Av. D. Carlos I, 134 - 1.º 1200-651 Lisboa Portugal

**Romania:** Autoritatea Nationala de Supraveghere a Prelucrarii Datelor cu Caracter Personal (<http://www.dataprotection.ro/>) , telephone: +40 318 059 211 and mail address: 28 30 Magheru Blvd District 1, Bucharest.

For any additional information you may also visit this page: [https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules\\_en](https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules_en)

## Contact

All questions, comments and requests regarding this Privacy Notice could be addressed to our Data Protection Officer, Mr. Panagiotis Skylras at [dpo-office@stoiximan.gr](mailto:dpo-office@stoiximan.gr)

*Lately revised on 06/04/2020.*



*It is important to point out that we may amend this Recruitment Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.*