



APPROVED
 at the meeting held by JSC Baltic International Bank
 Management Board on 10 May 2018
 Minutes No. 01-05/31/18

JSC Baltic International Bank

PERSONAL DATA PROCESSING NOTICE TO DATA SUBJECTS FOR THE PURPOSES OF PROCESSING OF THE PERSONAL DATA OF CANDIDATES AND TRAINEES

1. Information about the data controller responsible

Our company name is **Joint Stock Company “Baltic International Bank”**,

Registration number: 40003127883,

Registered office: 43 Kalēju Street, Riga, LV-1050.

You may contact us in the manner as follows:

over the telephone by calling [\(+371\) 6700 0444](tel:+37167000444)

by fax, number [\(+371\) 6700 0555](tel:+37167000555) or

by emailing to: info@bib.eu.

2. Contact information for communication on the personal data protection matters

Should you have any questions in relation to this Notice or the processing of your personal data, please do not hesitate to contact us using the communication channels referred to in Clause 1 herein or by emailing to: dataprotection@bib.eu

3. General description of the personal data processing carried out by us

This Notice describes how we process the personal data of candidates (applicants) for our job openings and other persons whose data may become available to us in connection with the selection of staff.

The purpose of this Notice is to enable those wishing to apply for the job openings announced by us or other companies within our group of companies, including persons whose data have been transferred to us by the applicants (for instance, referees' data) to read our personal data processing rules.

This is the most recent version of the Notice. We reserve the right to make changes and, if necessary, update this Notice.

The purpose of this Notice is to give you a general overview of our personal data processing activities and purposes; however, please note that other documents (for instance, Website Usage Rules available at <https://www.bib.eu/lv/dokumenti#A5>) may provide additional information about the processing of your personal data.

We are aware that personal data is a value for you and we will process it in accordance with the confidentiality requirements and taking care of the security of your personal data at our disposal.

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4. For what purposes will we process your personal data and what is the lawful basis for the processing of personal data?

We will process your personal data only for the predefined legitimate purposes, including:

a) **To ensure the employee selection process and implementation of the rights and obligations arising therefrom –**

Within the framework of this purpose, we collect CVs and enclosed documents from the applicants, contact applicants and the referees specified by the applicants to collect references; subject to the applicant's consent, we store CVs for other competitions; also, to be able to defend our interests in litigation, we store data to reply to claims and lawsuits filed in courts.

For this very purpose and the above sub-purposes, we may require at least the personal data as follows: the applicant's first name, surname, contact information (e-mail, telephone number), applicant's education and previous work experience, persons who can give references and their contact details, references on the applicant as well as other information that may be relevant for the respective position and identification of the most suitable applicant.

The main lawful bases for the meeting of said purposes are:

- consent (Article 6(1)(b) of the General Data Protection Regulation¹) – in relation to the CV submission fact and storage of CV for further competitions;
- entry into a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation) – in relation to the processing of personal data of the applicants with whom the employment contract will be concluded;
- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation – in some cases, in relation to the specific data types if the regulatory enactments determine mandatory requirements for the specific position;
- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation) – in relation to the provision of proof in the event of potential claims as well as in relation to the amount of information required.

b) **To enter into the employment or traineeship contract –**

Within the framework of this purpose, we collect information that needs to be included in the employment or traineeship contract and its annexes; we will identify you, verify your qualification documents, draw up the employment or traineeship contract

For this purpose, we may require at least the personal data as follows: the employee's or trainee's first name, surname, identity number, residential address, telephone number, commencement date of the employment relationship or traineeship, place of work, employee's education data, employee's qualification data, description of the job duties to be performed, position, work contact details, amount of salary, current account number; if need be, data relating to the state of health.

The main lawful bases for the meeting of said purposes are:

- entry into a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation);
- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation – in relation to the information to be specified in the employment contract and the required

¹ REGULATION (EU) 2016/679 (27 APRIL 2016) OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 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)

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qualification criteria as well as informing the state authorities about the fact of employment (for instance, State Revenue Service);

- carrying out the obligations and exercising rights of the data controller responsible in the field of employment (Article 9(2)(b) of the General Data Protection Regulation) – in relation to the processing of special categories of data (health data, trade union membership).

c) Prevention of threat to security, property interests, and pursuing our other legitimate interests or legitimate interests of third parties

Within the framework of this purpose, we would need to perform video surveillance of our area, buildings and other properties, use personal data processors to ensure different functions and, if need be, exchange information within the group of companies, exercise the right to pursue own legitimate interests granted under the regulatory enactments.

For this purpose, we may need to process at least the personal data as follows: data in the video recordings, data on premise visits fixed in the access control systems, etc.

The main lawful bases for the meeting of said purposes are:

- legitimate interests pursued by the data controller responsible (Article 6(1)(f) of the General Data Protection Regulation).

5. Who can access your personal data?

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

If need be, your personal data may be accessed by:

- 1) the Bank's or other companies' employees or directly authorised persons who need it to perform their job duties, for instance, accountants, immediate managers, employees of the HR Management Directorate;
- 2) personal data processors in accordance with their services and only in the scope required, for instance, accounting service providers, auditors, financial management and legal advisors, database maintainer, other persons connected with the process of selection of staff of the controller and other companies within our group of companies;
- 3) state and municipal institutions in the cases specified in the legal enactments, for instance, law enforcement authorities, tax authorities;

6. What counterparties in the personal data processing or personal data processors do we choose?

We implement the respective measures to ensure the processing, protection and transfer of your personal data to data processors in accordance with the applicable legal enactments. We carefully select personal data processors and, when making data transfer, we evaluate its necessity and the amount of data to be transferred. Data transfer to processors is carried out subject to the requirements of confidentiality and secure processing of personal data.

At present, we may cooperate with the personal data processor categories as follows:

- 1) outsourced accountants, auditors, financial management and legal advisers;
- 2) owner/developer/maintainer of the IT infrastructure, database;
- 3) other persons connected with the provision of our services;
- 4) health insurance company and mandatory health check-up performer;
- 5) service providers or organisers, for instance, to participate in a marathon, purchase sports club membership, for educational institutions, etc;
- 6) photographers taking photos/shooting videos during events;

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- 7) business trips related to the performance of job duties (plane tickets, hotels);
- 8) external trainers (if certificates containing personal data are given after training);
- 9) business card makers;
- 10) sworn notaries – employees drawing up powers of attorney.

From time to time, there may be changes in the categories of personal data processors; such changes will also be made in this document.

7. Are your personal data transferred outside the European Union (EU) or the European Economic Area (EEA)?

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

8. How long will we store your personal data?

Your personal data is stored for as long as its storage is required for the respective personal data processing purposes as well as in accordance with the requirements of the applicable legal enactments.

When assessing the personal data storage duration, we take into account the requirements of the applicable legal enactments, contractual obligation fulfilment aspects, your instructions (for instance, in the case of consent) as well as our legitimate interests. If your personal data is no longer required for the purposes specified, we will erase or destroy it.

For instance, we will store your CVs and enclosed documents submitted for the specific job opening until the end of the competition as well as for at least six months thereafter in order to protect ourselves in case of possible claims and legal proceedings against us. In turn, if you have submitted CVs and enclosed documents without mentioning the specific job opening or have given consent to the use of your CV and enclosed documents for later staff screenings, we will store your CV and enclosed documents for one year. You are always entitled to withdraw your consent to the storage of such data.

If the employment contract is signed with you, the CV and enclosed documents, as required, may be added to your employee file and stored for the entire duration of the employment contract.

9. What are your, as the data subject, rights in relation to the processing of your personal data?

Personal data updating

If there are changes in the personal data you have provided to us, for instance, changes in contact address, telephone number or e-mail address, please contact us and provide us with the up-to-date data so that we can meet the respective personal data processing purposes.

Your right to access and rectify your personal data

In accordance with the requirements of the General Data Protection Regulation, you are entitled to access your personal data at our disposal, request its rectification, erasure, processing restriction, object to the processing of your data, and the right to data portability in the cases and under the procedure specified in the General Data Protection Regulation.

We respect your right to access and control your personal data; therefore, upon receipt of your request we will respond to it within the timeframes specified in the regulatory enactments (usually not later than within one month if there is no specific request that takes more time to prepare a reply) and, if possible, will either rectify or erase your personal data.

You can obtain information about your personal data available to the Bank or exercise your other rights as the data subject in one of the following ways:

- 1) by submitting the respective application to the Bank in person and identifying yourself in our

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- office at 6 Grēcinieku Street, Riga, every working day from 10.00 till 16.00;
- 2) by mailing the respective application to us to the address: 43 Kalēju Street, Riga, LV-1050;
 - 3) by emailing the respective application to info@bib.eu or dataprotection@bib.eu; it is recommended to sign your application with a secure electronic signature.

Upon receipt of your application, we will evaluate its content and your identifiability and, depending on the situation, reserve the possibility to ask you to additionally identify yourself to ensure that your data is secure and is disclosed to the respective person.

Consent withdrawal

If your personal data processing of is based on your consent, you are entitled to withdraw it at any time, and we will not further process your personal data which we were processing based on your consent for that purpose. However, please be advised that the withdrawal of consent can not affect the processing of personal data that is required to fulfil the requirements of the regulatory enactments or is based on a contract, our legitimate interests or other bases specified in the regulatory enactments for the lawful processing of data.

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

10. Where can you file a complaint with regard to the issues connected with person data processing?

If you have any questions or objections with regard to the processing of your personal data by us, we encourage you to, first of all, contact us.

However, if you still believe that we were not able to resolve the issue and you believe that we are still violating your right to the protection of personal data, you are entitled to file a complaint with the Data State Inspectorate. Sample applications for the Data State Inspectorate and other related information may be found on the Data State Inspectorate's website (<http://www.dvi.gov.lv/lv/datu-aizsardziba/privatpersonam/iesniegumu-paraugi/>).

11. Why do you have to submit your personal data to us?

Mostly, we collect your information for the purposes of the staff selection process, to comply with our binding legal obligations and pursue our legitimate interests. In these cases, we need to obtain the specific information to meet the respective purposes; thus, a failure to provide such information may endanger the commencement of an employment relationship. If data is not mandatory but its submission could help improve the work environment or your employment conditions, we will specify that data submission is voluntary.

12. How do we obtain your personal data?

We can obtain your personal data in any of the manners as follows:

- 1) from you by submitting an application and CV to participate in the competition for a job opening;
- 2) from the applicant if he or she has specified your personal data to get references on him or her;
- 3) in the process of entering into a mutual contract obtaining the data from you;
- 4) from you if you submit to us any applications, emails, or call us;
- 5) from you if you provide information about the applicant;
- 6) where applicable, from video surveillance recordings and access control systems.

13. Is your data used in automated decision-making?

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

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