

Recruitment Application Form – Notice

Data Protection Notice

In applying to join the Lanitis Bros Ltd team, you will be providing us with certain personal data about yourself. This policy sets out how we will process this data and comply with the various laws to which Lanitis Bros Ltd (“Lanitis Bros Ltd”) is subject to ensure that we deal with your personal data in an appropriate manner.

Who are we?

Your personal data is processed by Lanitis Bros Ltd you apply to, and this company will be the data controller of that personal data. We may pass your data between other companies, also members of the CCHBC group of companies, as is Lanitis Bros Ltd, for the purpose of your recruitment selection and if you are taken on, as part of your employment. Where reasonably necessary or required to do so, we may disclose these details to third parties in relation to law enforcement or regulatory investigation and also for the purpose of conducting any pre-employment checks (to the extent legally permitted).

What personal data may we collect about you and why?

As part of your recruitment process we may collect:

- your contact details, CV or résumé, application form details, interview notes, national insurance or other identification number, and your visa, passport or permission to work documentation, certifications, diplomas, professional qualifications, valid driving license;
- health details (via our occupational health assessor, limited to a declaration of fitness to work);
- the results of criminal records or financial probity checks or other independent searches (and where we do so you will be asked to consent to such collection and use before we or our agents undertake the search) to assess your suitability for the position;
- details of your ethnic background and disabilities you may have and whether you have been long term unemployed strictly for the purposes of monitoring compliance with anti-discrimination legislation and our policies.

We may also invite you to complete tests or participate in assessment activities and we will keep their results.

We do not conduct any vetting of applicants aside from ascertaining an applicant’s legal ability to work. We short list applicants using a manual selection process, considering appropriate experience and skills for the job.

If you are taken on to work at Lanitis Bros Ltd we will collect other personal data. Please see our Employee Data Protection Notice for details of this. We will need:

- your contact and bank details to pay you and correspond with you;

- details relevant to any benefits that we may administer on your behalf (eg. pension) for that purpose;
- notes of meetings and issues raised with, or by, you as part of your employment (including disciplinary meetings);
- your training records;
- limited health details through health screening or accident reports to comply with our health & safety obligations;
- your images on CCTV for the purpose of monitoring access to and from sites and the prevention of health & safety issues and crime.

What legal basis do we have for using your personal data?

We process your personal data in order to assess your application prior to entering into an employment contract with us and pursuant to laws to which Lanitis Bros Ltd is subject (e.g. in relation to equal opportunities). If you are unable to provide us with the information requested, we are unable to assess your appropriateness for the job applied for or to communicate with you.

If we require further personal data from you we will let you know whether this is in order to fulfil your contract or as a consequence of a statutory obligation and we will let you know what the consequences would be if you failed to provide this to us and any risks associated with the use of the Personal Data by us.

When do we send your personal data abroad?

We hold your personal data principally in the country in which you apply for a role. However, it is sometimes necessary for us to provide details about your application to our other CCHBC group companies situated outside the European Economic Area for the purposes of your selection. When we do so, we will ensure that such transfers ensure that an appropriate level of protection is given to the personal data (and we use EU approved “Model Clauses” where appropriate in order to ensure this). Please contact the Data Protection Officer if you would like to see a copy of the safeguards we apply in relation to the export of your personal data.

How long do we keep your personal data for?

We keep records of your data for no longer than is necessary for the purpose for which we obtained them and any other permitted linked purposes. We will ask you if you want us to keep your details on file for the purposes of further job opportunities if your application is not successful.

Your personal data will be maintained for retention periods that follow the statute of limitations designated under the applicable in Cyprus legislation for the belowmentioned indicative cases:

(a) for a period of 6 years in case of breach of contract,

(b) for a period of 12 months in case employment disputes after termination of employment, or for a period of 9 months following the Redundancy Fund reply for the redundant personnel,

(c) for a period of 3 years in case of civil wrong (tort) disputes,

(d) for a period of 7 years for tax purposes, and

(e) for anti-money laundering related purposes related documents and records shall be kept for a period of 5 years following the termination of the business relation or the date of the specific transaction.

The abovementioned statute of limitation applicable to a variety of cases is taken predominantly into consideration by Lanitis Bros Ltd for determining the retention of employees' personal data for specific time periods, which in some cases can extend beyond the termination/expiry of the employment relationship. It is also stated that any retention period can be extended until the conclusion of a potential court and/or legal dispute and the relevant process.

What are your rights in relation to the personal data we collect?

If you are based in the EU, or we process your personal data in the EU, you have certain rights in relation to the data we collect about you:

- **Subject Access:** You have a right to be provided with access to any data held about you by Lanitis Bros Ltd generally within 1 month of your request.
 - (a) **Rectification:** You can ask us to have inaccurate personal data amended.
 - (b) **Erasure:** You can ask us to erase personal data in certain circumstances pursuant to Art. 17 GDPR and we will take reasonable steps to inform other controllers that are processing the personal data that you have requested the erasure of any links to, copies or replication of it.
 - (c) **Withdrawal of consent:** You can withdraw any consents to processing that you have given us and prevent further processing if there is no other ground under which Lanitis Bros Ltd can process your personal data.
 - (d) **Restriction:** You can require certain personal data to be marked as restricted whilst complaints are resolved and also restrict processing in certain other circumstances.
 - (e) **Portability:** You can ask us to transmit the personal data that we hold about you to a third party electronically.
 - (f) **Raise a complaint:** You can raise a complaint about our processing with the data protection regulator, namely Greek Data Protection Authority.

Automated short-listing

We may use automated criteria to determine which applications we take forward to the next stage of selection. If rejected, you have the right to request us to re-evaluate this automated decision making in a non-automated way and for us to provide you with information about this. Please indicate here if you consent to us undertaking this automated processing.

I consent to Lanitis Bros Ltd undertaking **automated processing in relation to my application.**

Future vacancies or further job opportunities

Please indicate here if you wish us to keep your details on file for future vacancies or further job opportunities, if your application is not successful.

I would like my details to be kept on file by Lanitis Bros Ltd for a period of two (2) years for future vacancies or further job opportunities if my application is not successful and for this purpose I hereby grant my consent. I may withdraw my consent at any time by sending an e-mail to DataProtectionOffice@cchellenic.com

Your contact for any queries

Lanitis Bros Ltd has a designated Data Protection Officer who should be contacted if you have any queries regarding the interpretation of this notice. The contact details are set out below:

- Data Protection Officer: Nassos Stylianos
- Location: Coca-Cola HBC Services MEPE, 9 Fragoklissias Street, 15125 Maroussi, Greece
- E-mail: DataProtectionOffice@cchellenic.com