

Data Protection Policy of ICAP Employment Solutions S.A

2, Eleftheriou Venizelou Avenue, Kallithea, Athens, Greece

with VAT number 999842443 (Reg. No. 122566601000)

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1. Field of Scope

This privacy notice lays out the way **ICAP Employment Solutions S.A** (hereinafter referred to as “**ICAP Employment Solutions**”) collects, uses, processes, stores, manages, and protects the employment, academic, health and payroll data of individuals (hereinafter referred to as “**Personal Data**”), so as to meet the data protection standards of the company and comply with the applicable data protection law.

This privacy policy shall apply to all information (i) that relates to the products and services (hereinafter referred to as “**Services**”) provided by ICAP Employment Solutions (including but not limited to Outsourcing Services, Recruitment Process Outsourcing (RPO), Payroll Services, Staffing Solutions, Business Process Outsourcing) where such data is collected directly by the individuals (ii) pertaining to candidate employee or employment data, academic and payroll data collected through third party recruitment platforms, ICAP’s network or existing Clients iii) pertaining to certain health data of employees

iv) pertaining to Client data obtained during the use of the Services. ICAP Employment Solutions is bound to protect the privacy of Clients, individuals and other data subjects and adhere to the Data Protection legislation currently in effect.

This policy shall not apply to information collected through any other website, services, products, platforms or for practices of companies that we do not control. We are not responsible for any personal data protection practices pertaining to websites, services, products, platforms of other companies.

2. Categories & Types of Collected Data

Data Collected:

A. Candidate Employee Data: name/surname, date of birth, address, academic and professional qualifications, contact details, address, nationality, candidates suitability evaluation reports, previous employment information, marital status, e-mail, military service completion/exemption certificate

B. Employment & Payroll data: first name, last name, Tax Registration No. Identification Card/Passport No. (Date of issuance & issuing authority), IKA's Registration No., father's name, mother's name, date of birth, AMKA Registration No., address, Tax Authority Department (ΔOY), contact details, nationality, marital status, protected members (numbers, date of birth, name), social insurance history, educational level, health record for chronic disease, unemployment card nr., bank account particulars, social security stamps, family status certificate, military service completion/exemption certificate

C. Outsourced employees payroll data: all employment registration data (first name, last name, Tax Registration No. Identification Card/Passport No. (Date of issuance & issuing authority), IKA's Registration No., father's name, mother's name, date of birth, AMKA Registration No., address, Tax Authority Department (ΔOY), contact details, nationality, marital status, protected members (numbers, date of birth, name), social insurance history, educational level, health record for chronic disease, unemployment card nr., bank account particulars, social security stamps, family status certificate, military service completion/exemption certificate) salary and benefits package)

D. Employee health/medical data: Names/surnames, diagnostic results, doctors' notes, health treatments, illnesses, hospital reports

Declaration Regarding The Processing of Personal Data By ICAP Employment Solutions (by its capacity as Data Controller and Processor - in accordance with the General Data Protection Regulation EU 679/2016)

Why will you process my Personal Data (PD)?

ICAP Employment Solutions provides outsourcing, recruitment process outsourcing (RPO), payroll staffing solutions, business process outsourcing services, containing employment, academic, health and payroll data of individuals on the basis of the intended purpose, such as described in paragraph 6 hereof. Their contents vary depending on the type and purpose of the provided service of ICAP Employment Solutions.

The lawful basis of the data processing is ICAP Employment Solutions's legitimate interest and in some instances the consent of the data subjects.

In addition ICAP Employment Solutions may collect personal data of candidate employees with their consent for the purpose of exploring employment opportunities.

Furthermore ICAP Employment Solutions collects candidate employee data through third party sources (online recruitment platforms or business networking sites/platforms or other) on the basis of its legitimate interest. More specifically:

(i) ICAP Employment Solutions utilizes the Careerbuilder S.A (Luceo) platform to provide us with the ATS Luceo from which we receive job applications and manage all necessary candidate employee (CV) data

For more information about Careerbuilder S.A, please read their Privacy Notice at https://hiring.careerbuilder.com/company/privacy-policy?_ga=2.190219435.1804941326.1531996993-234062023.1531996993

(ii) ICAP Employment Solutions utilizes the online business opportunity and networking platform Kariera.gr from which we receive job applications and manage all necessary candidate employee (CV) data

For more information about Kariera S.A, please read their Privacy Notice at https://hiring.careerbuilder.com/company/privacy-policy?_ga=2.190219435.1804941326.1531996993-234062023.1531996993

(iii) ICAP Employment Solutions utilizes the online business opportunity and networking platform skywalker.gr from which we receive job applications and manage all necessary candidate employee (CV) data

For more information about Skywalker.gr, please read their Privacy Notice at <https://www.skywalker.gr/elGR/static/politiki-aporritou>

Lastly ICAP Employment Solutions collects within the framework of the aforementioned provided Services, certain special categories of Personal Data as defined in Article 9 of the GDPR (i.e health records or doctors' notes, hospital reports etc) with the explicit consent of the Data Subjects. Said data are submitted for absence justification of the employee or his/her inclusion to a private insurance program utilisation. Only data that are essential for those purposes, are being collected and processed. The processing of these data may also be necessary for compliance with a legal obligations to which ICAP Employment Solutions is subject.

Information automatically collected when visiting and interacting in the website <https://www.icap.gr/>:
With regards to the data collected through the website <https://www.icap.gr/> (hereinafter referred to as “**Website**”) you may review the pertinent privacy notice here **[\[insert ICAP's privacy notice link\]](#)**.

3. Data Collection Points

- Third party recruitment platforms (Luceo, Skywalker, Kariera etc) - **A**
- Third party business networking platforms (linkedin) - **A, B**
- ICAP Network - **A**
- Corporate Clients (employers) - **B,C**
- Employees - **D**

4. Transfer of Data to Third Parties

ICAP Employment Solutions reserves the right to disclose your personal data to any member of its affiliate/subsidiary companies (parent company and its subsidiaries) or other third parties to the extent it is reasonably necessary for the purposes determined in this notice and in particular:

- Certain data (CVs and evaluation reports) will be transferred between members of ICAP Group (inter-group data transfers)
- Your employment and payroll data may be transmitted and become accessible by legal entities (corporate customers) with which, we have entered from time to time into contractual agreements for the purpose of fulfilling our company's legitimate interest (provision of staffing recruiting and payroll services) in a correct and within our contractual terms framework
- Your payroll data may be transmitted and become accessible by bank institutions with which we cooperate for the purpose of processing the payments of employees
- Your data may be disclosed to cloud hosting providers for the purpose of storing and safeguarding the data with the appropriate technical and security measures
- Your data may be transmitted, become accessible and processed by subsidiaries of our group within the European union, which apply the appropriate technical, physical and administrative security measures for the protection of the data from loss, misuse, damage, alteration, unauthorised access and disclosure, as provided by article 32 of the GDPR 679/2016
- Your data (specifically employment and payroll data) may be disclosed to public authorities (EFKA, Ergani) in compliance with pertinent legal obligations of ICAP Employment Solutions
- During all data transfers, we always take all appropriate measures so as to ensure that the transmitted data are the minimum required for the intended processing purpose and that the conditions for legitimate and lawful processing will always be met
- ICAP Employment Solutions' servers are hosted at IBM's data centre (hosting provider) located in Athens. You may find more information on IBM's privacy notice in the following link:
https://www.ibm.com/privacy/details/us/en/#section_2

5. Personal Data Retention Period

ICAP Employment Solutions only ever retains personal data for as long as is necessary and we have strict review and retention policies in place to meet these obligations. The data retention period depends on the lawful basis of processing, as set out in detail below:

- In case the lawful basis for processing is the exercise of legitimate interest, the processing of personal data is carried out for as long as it is considered necessary for the achievement of the intended statutory purpose of ICAP Employment Solutions described in paragraph 6 below, and until such time the limitation period of any related claims has expired.
- In case the personal data of the employees have been provided with their own consent and within the framework of our services, we shall retain those data until the granted consent by the data subject has been withdrawn. In case the consent is withdrawn for any valid reason, we shall retain them for as long as it is required until the limitation period of any related claims expires.
- In case the lawful basis for processing is the performance of the contract, we shall retain your data for as long as you retain the contractual relationship with ICAP Employment Solutions in hard copy and in electronic form or we shall retain them for as long as it is required until the limitation period of any related claims expires.
- In case the the lawful basis for processing is the explicit consent of the data subject (such in the case of medical-health records), we shall retain those data until the granted consent by the data subject has been withdrawn unless specific legislation in effect allows us or ordains to retain the data.

6. Legitimate Interest - Intended Purpose - Lawful Basis for Data Processing

Data processing is necessary for the purposes of the intended statutory purpose of ICAP Employment Solutions which is the provision recruitment process outsourcing and payroll Services, staffing solutions and related services.

Within this framework, ICAP Employment Solutions collects, manages and provides employment, academic, health and payroll data of individuals for the performance of the contracts with corporate clients. ICAP Employment Solutions processes and stores the said data within the E.U.

7. Rights of the Data Subjects

You may exercise, as the case may be, the rights deriving from the applicable Greek Legislation and the General Data Protection Regulation (Regulation (EU) 2016/679) which are as follows: (a. the right of information (article 13), b. the right of access (article 15), c. the right to rectification (article 16), d. the right to erasure “right to be forgotten” (article 17), e. the right to restriction of processing (article 18), f. the right to data portability (to receive your personal data in a structured and commonly used format - article 20 where applicable) and g. the right to object (article 21) which applies to certain data processing activities

- These rights can be exercised only in cases where ICAP Employment Solutions acts as Data Controller and in particular when ICAP Employment Solutions (i) processes the personal data of employees in relation with the products and services provided by it in pursuance of its statutory objectives (ii) processes the personal data of candidate employee or employment data, academic, health and payroll data collected through individuals or outsourced employees (iii) pertaining to Client data obtained during the use of the Services
- This Privacy Notice does not apply to personal data mentioned on business documents that our customers transmit to our systems when using our Services
- These rights shall be exercised free of charge for you by sending a relevant letter to the Data Protection Officer (DPO) of ICAP Employment Solutions: 2, Eleftheriou Venizelou, Kallithea or via e-mail to privacy@icap.gr. In case however, the aforementioned rights are exercised excessively and without good cause thus causing us administrative burden, we may charge you with the cost related to the exercise of the respective right
- In case you exercise any of your rights, we will take all appropriate measures available for the satisfaction of your request within thirty (30) days following the receipt of the relevant request. We may either inform you on the acceptance of your request or on any objective grounds that hinder the processing of your request
- Notwithstanding the above, you may at any time object to the processing of your Personal Data, by withdrawing your consent (article 7, par. 3 of the GDPR 679/2016) by sending a letter to the Data Protection Officer (DPO) of ICAP Employment Solutions: 2, Eleftheriou Venizelou, Kallithea, or via e-mail to privacy@icap.gr. This right applies only in cases where the lawful basis for the data processing is the consent of the Data Subject

8. Data Processing by ICAP Employment Solutions

In some instances, our corporate clients provide their employees' data, for the purpose of providing to them outsourced payroll services- which contain personal data. In such cases, ICAP Employment Solutions shall operate as the "Data Processor" of the personal data, which are included in the said business data. Consequently, in those cases different provisions of the GDPR 679/2016 shall apply, with which we comply.

Additionally, ICAP Employment Solutions applies throughout the data processing procedure, the appropriate technical, physical, and administrative security measures for the protection and security of the personal data from loss, misuse, damage or modification, unauthorised access and disclosure, in compliance with article 32 of the GDPR 679/2016, in order to ensure the appropriate security level against those risks. Those include, among others, as the case may be: **a)** application of encryption protocols **b)** the ability to ensure confidentiality (article 90 GDPR 679/2016), the integrity, availability, and resilience of processing systems and services on an ongoing basis, **c)** the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident, **d)** a process for regularly

testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing. Moreover, ICAP Employment Solutions shall take measures so as to ensure that any physical person acting under the authority of the data controller or of the processor, who has access to personal data, shall not process those data except on instructions from the data controller and limits access to your personal information to authorised employees.

Indicative security measures applied by ICAP Employment Solutions are as follows:

- ICAP Employment Solutions maintains a dedicated information security team that plans, implements and provides surveillance of our information security program
- The company controls the security and functionality of its products and services before they are introduced to the Internet, for any vulnerabilities in technology
- The company performs ongoing infrastructure checks to detect weaknesses and potential intrusions, vulnerabilities in systems etc.
- The company uses **https** protocols for secure and encrypted client communication with ICAP Employment Solutions
- The company uses the open standard protocol to access Lightweight Directory Access Protocol (**LDAP**) directory services and uses encrypted passwords
- The company uses a Secure Sockets Layer (SSL) certificate to create an encrypted connection between the web server and the Client's/User's browser

9. Profiling

We use the information we obtain from candidate employees to in order to evaluate and categorize the data based on internal customer requirements. We may also carry out customized candidate suitability evaluation reports.

We recommend to our customers to review and interpret the reports on their own based on their actual business requirements. Our customers may choose to use our evaluation reports alone or combine the reports with other information available to them. We do not maintain blacklists of any kind and we do not encourage our customers to reject or approve candidates under any circumstances based on those reports.

10. Submission of Complaint - Appeal

- For any issue regarding the processing of your personal data, you may contact us via e-mail at privacy@icap.gr
- Moreover, you shall always be entitled to contact the Hellenic Data Protection Authority, which may accept the submission of relevant complaints in writing at its protocol in its offices at 1-3, Kifisias Street,

Postal Code 115 23, Athens or by e-mail (contact@dpa.gr) in accordance with the instructions indicated on its website.

- If you no longer wish to receive newsletters from ICAP Employment Solutions, please send an e-mail to [\[redacted\]](#) or follow the unsubscribe instructions included in each relevant email/communication.

11. Amendments

This policy may be renewed from time to time, due to amendments to the related legislation or change to the corporate structure of ICAP Employment Solutions. Thereby, we encourage the Clients to periodically visit the Website so as to be informed regarding recent information of privacy practices. In any case, the Clients may be informed by e-mail or a notice in our Website regarding any amendments to this policy.