

Privacy Policy for recruitment

Etraveli Group AB, reg. no. 556584-4684 (“we”, “us” or “our”) take data security and adherence to data protection legislation very seriously. This privacy policy explains how we collect, store, use and disclose any personal data in connection with our recruitment processes. Your privacy matters to us so please take the time to get to know our practices when you apply for a job opening posted by us - and contact us if you have any questions.

We are the so-called “data controller” of your personal data (for the purpose of the General Data Protection Regulation (“GDPR”) and are responsible for the lawfulness of what we do with your personal data.

We use Workable, an online application tool provided by Workable Software Limited, to assist with our recruitment process (the “Service”). Workable is only entitled to process your personal data in accordance with our instructions.

Your Personal Information

Information we collect from you

We collect and process some or all of the following types of information provided by you:

- Information that you provide when you apply for a job opening. This includes information provided through an online job site, via email, in person at interviews and/or by any other method. In particular, we process personal details such as name, email address, address, date of birth, qualifications, experience, information relating to your employment history, skills and experience that you provide to us;
- If you contact us, we may keep a record of that correspondence;
- Details of all actions that you carry out through the use of the Services; and
- Details of your visits to Workable’s website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Workable’s website and the resources that you access.

We may also process so called special categories of personal data about you, which can be considered sensitive, if you have chosen to provide us with such or if you have made such information publicly available and thereby allowed us to process such to a limited extent.

Information we collect from other sources

Workable provides us with the facility to link 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 LinkedIn and other social media profiles.

Workable’s technology enables us to search various databases, which may include your personal data, to find possible candidates to fill our job openings. Where we find you in this way, we will obtain your personal data from these sources.

Our use of your information

Lawful basis for processing

We rely on legitimate interest as the lawful basis for the processing set forth in this Privacy Policy. Our legitimate interest is the recruitment of staff for our business.

You may object to our processing of your personal data by managing your privacy settings in the Workable Service, accessible via the confirmation emails, or by contacting us directly (refer to section “Contact”).

Purposes of processing

We use information about you in the following ways:

- To consider your application in respect of a job opening for which you have applied;
- To consider your application in respect of other job openings;
- To communicate with you in respect of the recruitment process;
- To enhance any information that we receive from you with information: obtained from other sources;
- To find appropriate candidates to fill our job openings; and
- To help Workable improve their service.

Automated decision making/profiling

We may use Workable’s technology to find appropriate candidates, based on criteria we have decided. The process of finding suitable candidates is in such case automatic, however, any decision as to who is appropriate for the job opening will be made by our staff.

How we store your personal data

Security

We take appropriate measures to ensure that all your personal data is processed with security in mind, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal data to those who have a genuine business need to view it. Those processing your information will do so only in an authorized 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.

Sharing your personal data

We will only share your personal data where necessary for the purposes listed in this privacy policy. This may be to other companies within the Etraveli Group, of which e-Travel S.A. is a part, government authorities and our trusted suppliers (data processors, like for example Workable).

The data that we collect from you and process using Workable’s Services may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating

outside the EEA who work for us or for one of our suppliers.

Our sharing of personal data outside the EU/EEA requires certain legal ground under applicable data protection legislation. Where a country is regarded by the European Commission to be a country with adequate level of protection for personal data, this will be our legal ground. Otherwise there are three main types of legal ground on which we may base such sharing. These are:

- i. that the transfer is necessary for our performance of the contract with you; and
- ii. that the transfer will be based on the standard data protection clauses for transfer of personal data to countries outside of the EU/EEA adopted by the European Commission (a copy of these standard data protection clauses can be found at <http://ec.europa.eu/justice/data-protection/international-transfers/transfer/>) and any other complementary agreements if required.

How long we keep your personal data

We will retain the personal data we collect for a maximum of **24** months.

Your personal data will be deleted on one of the following occurrences:

- after 24 months;
- upon your deletion of your personal information via the Workable Services; or
- after our receipt of a written request from you in accordance with the below (“Your rights”).

Your rights

According to the applicable data protection legislation, you have certain rights as a so-called “data subject”. Your rights include the following:

- i. **Right to access** – You are entitled to access the personal data that we handle. You are also entitled to receive certain information about what we do with the personal data. Such information is provided in this document.
- ii. **Right to rectification** – Under certain circumstances, you are entitled to correct inaccurate personal data concerning you and to have incomplete personal data completed.
- iii. **Right to erasure** – Under certain circumstances, you are entitled to have your personal data erased. This is the so-called “right to be forgotten”.
- iv. **Right to restriction of processing** – Under certain circumstances, you are entitled to restrict how we use your personal data.
- v. **Right to data portability** – You are entitled to receive your personal data (or have your personal data directly transmitted to another data controller) in a structured, commonly used and machine-readable format from us.
- vi. **Right to object** – You are entitled to object to certain types of handling of personal data that we carry out. This applies to all our activities that are based on our “legitimate interest”.

Finally, you also have the right to lodge a complaint with the applicable data protection supervisory authority.

Contact

For questions or further information about our handling of personal data, or for contact with us in other privacy matters, please use the following email address: privacy@etraveligroup.com

Changes

We may make changes or additions to this Privacy Policy. The latest version of the Privacy Policy will always be available through the Service.