

NOTIFICATION REGARDING THE PROCESSING OF PERSONAL DATA OF JOB APPLICANTS

1. Introduction & General Terms

The Hellenic American Education Center, lawfully established in the Municipality of Athens (Massalias Str., no. 22, Postal Code 10680) (the “HAEC”) collects, stores and processes Personal Data (as defined below) of the individuals who apply to it for employment (“Applicants” and/ or “you”), in accordance with the General Data Protection Regulation EU 2016/679 as in force (“GDPR”), as well as any local Data Protection legislation. This Notification describes how the HAEC collects, uses and processes Personal Data relating to its Applicants. This Notification covers Personal Data that is held electronically and also applies to paper-based filing systems. The HAEC is the data controller of your Personal Data.

2. What is Personal Data?

Personal Data means any information which relates to an identified or identifiable individual, or which could be used to identify an individual (“Personal Data”).

The types of Personal Data that the HAEC may collect from or about you include, on a case by case basis:

- (a) Personal information: name; surname; home contact information (address and telephone number); date and place of birth; gender; military status; mobile phone number; e-mail address; details relating to business activities and directorship(s) outside the HAEC; family status; and
- (b) Information on your education and experience: details of previous employers and recommendations, other data related to your previous employment, i.e. job title and/ or position and description of responsibilities/ duties; type of employment (fixed term or indefinite term); work schedule; start date and end date (if applicable) of employment; training attendance information; recommendations prior to your employment; academic record and educational record; professional training; licenses and certifications of any kind; language(s) spoken; career evaluation information; activities and investigations; and
- (c) any other data included in your CV or otherwise submitted to us, even if not requested.

3. Why does the HAEC process your Personal Data?

The HAEC processes your Personal Data for the following purposes: (1) evaluating your application to determine if you should be hired; (2) safeguarding the HAEC’s interests; and (3) complying with the provisions of applicable legislation.

4. Legal basis for processing Personal Data

The legal basis for the collection, processing and use of your Personal Data is established in article 6 para 1 letters a), b), c) and f) of GDPR. This means that we process your data: (i) on the basis of your consent, which is expressed by the clear affirmative action of sending your CV to us; (ii) in order to make steps at your request, prior to entering into a contract with you; (iii) in order to be able to comply with our legal obligations as your employer; and (iv) for the prevailing legitimate interests pursued by the HAEC or by a third party.

5. Does the HAEC share or transfer your Personal Data?

The HAEC may from time to time disclose your Personal Data to third parties for any of the purposes listed above. Examples of relevant third parties to whom the HAEC may disclose Personal Data include governmental agencies, courts, as well as third parties who render services in connection with (among other things) the evaluation of Applicants.

When we disclose your Personal Data to third parties who perform services on our behalf (e.g. companies performing payroll services, IT companies), we ensure that such service providers agree to use Personal Data only in accordance with our instructions and in accordance with the terms laid down in the relevant agreement which has been concluded between them and the HAEC.

The HAEC may also disclose Personal Data to third parties:

- where such disclosure is required by law; or for the purposes of, or in connection with, any legal proceedings to which it is a party, or otherwise for the purpose of establishing, exercising or defending its legal rights; or
- who are law enforcement authorities or other government agencies and who have made a lawful request for such disclosure; or
- where the HAEC believes that its disclosure is necessary in connection with an investigation of suspected or actual criminal activity; or
- in case the HAEC sells or transfers its activity or its assets (partially or in full) (including merger, restructuring, spin-off, termination or liquidation)

6. International Transfers of Personal Data

When we disclose your Personal Data to third parties located outside the European Economic Area (EEA), except where the relevant country has been determined by the European Commission to provide an adequate level of protection (currently Andorra, Argentina, Canada, Switzerland, Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Japan, Uruguay, United Kingdom and Republic of Korea), we require such recipients to comply with appropriate measures designed to protect personal data, usually by entering into standard contractual clauses with them, a copy of which may be requested by the Data Protection Officer of the HAEC.

7. Third-party Personal Data

Where you provide third-party Personal Data to the HAEC (ie. data from a spouse and/ or family members or third-party personal data for the purpose of obtaining recommendations), you are required to inform these persons about their rights in connection with the processing of their Personal Data (for example, by presenting the present Notification to them). Moreover, it is your responsibility to obtain the consent of these persons. At the time you provide the third-party Personal Data, the HAEC considers that the third-party consent as granted, to the extent required by law.

8. Data retention

The HAEC retains your Personal Data for the time period permitted or required by the applicable data protection/ regulation, which, in case that you are not being employed by us, may not exceed the period of 6 months, unless you have given your consent for its retention.

9. Consequences in case of failure to provide Personal Data

If an Applicant does not wish to disclose the requested minimum necessary Personal Data for the evaluation of his application, then the HAEC will review whether, in view of the circumstances, such evaluation can be made.

10. Applicant's Rights

You have the following rights under the data protection legislation:

- to request access to your Personal Data or to request that your Personal Data is rectified or deleted, or
- that its processing is restricted;
- object to the processing of your Personal Data; or
- receive your Personal Data in a portable format or to request the transmission of your Personal Data to a third party in a structured format; or
- withdraw your consent, at any time without affecting the lawfulness of processing based on consent before its withdrawal.

If you would like to discuss or exercise any of these rights, please use the contact details in section 13 below.

Finally, you have the right to lodge a complaint to the Hellenic Data Protection Authority (www.dpa.gr).

11. Origin of Personal Data

In principle any data relating to you is collected from you personally. The HAEC may also obtain your Personal Data from sources such as the following:

- An employment or recruitment agency;
- Previous employers;
- Public registers that contain your Personal Data;
- In the context of pre-employment screening, the HAEC may make use of public sources such as search engines and public sections of social media accounts to the extent that they are relevant to the job position of the Applicant;
- Third parties (e.g. individuals that make a recommendation for you).

12. Updates

The HAEC may update this Notification from time to time due to changes in laws and regulations or its internal procedures and systems and will notify the Applicants accordingly (e.g. via its website). All changes are effective from the date of publication, unless provided otherwise.

13. Contact Us

If you have any questions or concerns about this Notification, or would like to exercise any of your rights, please contact our Data Protection Officer at dataprivacy@haec.gr.