

## **Privacy Notice regarding the processing of the personal data of potential employees (in accordance with Article 13)**

### **1. Introduction**

You have shown interest in joining Harris Kyriakides LLC and therefore you are considered as a potential employee of this firm. This notice explains to you how Harris Kyriakides LLC (which includes its affiliate companies and is referred to as *HKLLC* or *Company* or *we*) will collect, process and use personal data about you during the application process. We are required to notify you of this information under relevant data protection legislation. This Notice is communicated to all natural persons who are interested in applying for an employment position at HKLLC or otherwise expressing an interest to establish a employment relationship with HKLLC.

HKLLC is committed to protect your privacy and handle your data in an open and transparent manner. We will handle your personal information with full respect to your personality and your rights arising from regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the Regulation) as well as the Law 125(I)/2018.

We ask you to read this Notice carefully as it contains important information on who we are, how and why we collect, store, use and share your personal information, your rights in relation to your personal information and on how to contact us and the supervisory authorities in the event that you have a complaint.

### **2. Definitions**

In this notice:

***Personal data*** means any information about you, that could identify you directly or indirectly, such as your name, ID number, phone number.

***Processing*** means any operation or set of operations performed on personal data, by automated means or otherwise, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **3. Who collects and holds your personal data (Controller)?**

HKLLC acts as a controller in relation to itself as well as in relation to affiliate companies which provide ancillary services, such as administrative services, consultancy, translations and other services.

**Registration Number:** HE224161

**Address:** 115 Faneromenis Avenue, Antouanettas Building, 6031 Larnaca, P.O.Box: 40089, 6300 Larnaca, Cyprus

**Telephone:** +357 24 201600

**Fax:** +357 24 201601

**E-Mail:** info@harriskyriakides.law

**Website:** www.harriskyriakides.law

If you have any questions, or want more details about how we use your personal information, you can contact our Data Protection Officer at:

**Address:** 115 Faneromenis Avenue, Antouanettas Building, 6031 Larnaca, Cyprus

**Telephone:** +357 24 201600

**Fax:** +357 24 201601

**E-Mail:** [dpo@harriskyriakides.law](mailto:dpo@harriskyriakides.law)

#### 4. About the information we collect and hold

##### 4.1. What information

We may collect the following information during the recruitment process:

- Your name, last name, your contact details (i.e. address, fixed and mobile phone numbers, email address).
- Details of your qualifications, experience, (including CV, academic or educational degrees), Reference/Recommendation Letter, License for Registered Practising Advocates.
- Your nationality and date of birth.
- Details of your references.

We may collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including your salary.
- Information regarding your academic and professional qualifications.
- Your nationality, driving license. marital status.

Some of the above categories may not apply to you depending on the position you are applying for.

##### 4.2. How we collect the information

We collect this information from you, your referees (details of whom you will have provided) your education provider or any relevant professional body.

##### 4.3. Why we collect the information and how we use it

We will typically collect and use this information for the following purposes:

- to take the necessary steps to enter into a contract (article 6(1)(b)), such as to examine your application and to take all the necessary steps to the conclusion of an employment contract;
- for compliance with a legal obligation (article 6(1)(c)) such as the employment legislation and tax legislation;
- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms (article 6(1)(f)), such as: (i) in the course of operation and safety of the information technology (IT) department of the Company; (ii) in the course of implementing a closed-circuit monitoring system(CCTV) in our premises; (iii) in the course of the Company's risk management; (iv) in the course of court proceedings and/or the assertion of legal claims;
- due to your express consent (article 6(1)(a)): In some occasions, you might have agreed to the processing of your Personal Data, i.e. to share your information with our clients interested for recruiting.

In this case, the processing of your Personal Data is based on your consent and you have the right to withdraw your consent at any time and we will stop processing your Personal Data.

However, the withdrawal of the consent will not affect the lawfulness of the processing based on consent before the withdrawal. We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

#### 4.4. Who we share your data with

In general, we do not share your Personal Data. Your Personal Data may be shared internally to our HR Department for the purposes of the recruitment exercise. Further, sometimes, we may need to share some of the above categories of Personal Data with other parties, such as clients interested for recruiting, after obtaining your express consent. The recipient of the data will be bound by confidentiality obligations.

We note that your Personal Data are not transferred to third countries (countries outside the European Economic Area) or to international organisations.

#### 4.5. How long we keep your information for

We will process and store your Personal Data during the recruitment process. How long we keep your information for will depend on whether your application is successful and you are employed by us, the nature of the information concerned, the purposes for which it is processed or according to any relevant Directive of the Commissioner of Personal Data Protection.

We will keep recruitment information for no longer than six (6) months, after which it will be destroyed. If there is a clear business reason for keeping recruitment information for longer than six (6) months, we may do so but we will first inform you of this, the longer period for which they will be kept and get your consent.

If your application is successful, we will only keep the recruitment information that is necessary in relation to your employment.

Please note that the above period might be extended if for legal (such as on-going procedures) or technical reasons we cannot delete the above information.

## 5. Your rights

You have a number of significant rights, under the Regulation. Specifically:

- 5.1. right to access your personal data (Article 15): meaning you might receive information and/or copy of the personal information we hold free of charge.
- 5.2. right to rectification (Article 16): you might ask us to correct any mistakes in your information which we hold.
- 5.3. right to erasure (*right to be forgotten*) (Article 17): you might ask us to erase the personal information concerning you. However, we reserve the right to deny the erasure, if the processing is necessary for compliance with a legal obligation, for reasons of public interests or for the establishment, exercise or defense of legal claims.
- 5.4. right to restriction of processing (Article 18): you might require us to restrict our processing of your personal data if you contest the accuracy of your personal data, the lawfulness of the processing, or you have objected to processing (according to article 21) and you wait for our reply whether we have legitimate grounds which override yours.
- 5.5. right to data portability (Article 20): you have the right to request and receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to a third party under certain circumstances.
- 5.6. right to object (section 21): You have the right to object at any time to the processing of your personal data, including profiling, which is conducted based on the legitimate and/or public interest (section 6 (1) (e) and (f)) when you deem that it is justified due to a particular situation concerning you. In case that you do not agree, we shall no longer process your personal data unless we demonstrate compelling legitimate grounds which override your interests, rights and freedoms or if the processing serves the establishment, exercise or defense of legal claims.
- 5.7. Automated individual decision-making (Article 22): you have the right to object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
- 5.8. right to withdraw your consent: you reserve the right to withdraw your consent at any time. However, the withdrawal of the consent does not affect the lawfulness of the processing based on consent before its withdrawal.

If you wish to exercise any of the above rights or to ask any questions or clarifications or to complain, please do not hesitate to contact our Data Protection Officer at:

[dpo@harriskyriakides.law](mailto:dpo@harriskyriakides.law).

Moreover, you also have the right to file a complaint at the Commissioner of Personal Data Protection. For more information concerning the process of filing a complaint, please visit the website [www.dataprotection.gov.cy/](http://www.dataprotection.gov.cy/)) or via e-mail at [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy) .

#### 6. Keeping your Personal Data secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to have access to 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.

#### 7. How can you file a complaint?

In case that you have any complaint and/or dispute in regards to the way your Personal Data is used, you are invited to contact the Data Protection Officer.

In any case, you are entitled to submit a complaint to the Commissioner of Personal Data Protection (you can find relevant information at <http://www.dataprotection.gov.cy>).

#### 8. Are you obliged to provide your personal data to HKLLC?

Yes. In order for us to be able to review your application for employment, you have to provide your Personal Data to us to the extent that it is necessary for the assessment of your application.

Without this data, we will not be able to create an employment relationship with you and we may not be able to assess your employment application.

#### 9. Does automated decision-making take place?

Automated individual decision-making means the process of making decisions through automated means of processing Personal Data/details, without human intervention (e.g. automated performance assessment). It is noted that we do not make automated decisions.

#### 10. Is your data used for automated profiling?

Automated profiling means the automated processing of Personal Data for evaluating your personal aspects for profiling. It is noted that we do not use your data for automated profiling.

#### 11. Changes in this Privacy Notice

We may change this privacy notice from time to time and in such case, we will inform you accordingly.

This Privacy Notice was last updated on 23/09/2020.

#### 12. General

Our HR Department or our Data Protection Officer can resolve any query or concern you raise concerning our use of your information or regarding this Notice.