

## Information on Personal Data Protection for Job Candidates

In accordance with Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter GDPR), we inform you about the following aspects of processing your personal data:

### 1. Personal Data Controller

- Company name: RCI LIZING D.O.O, branch office in Slovenia
- Address: Dunajska cesta 22, 1000 Ljubljana
- Contact person for data protection: DPO RCI Adriatic [adriatic\\_dpo@mobilize-fs.com](mailto:adriatic_dpo@mobilize-fs.com)

### 2. Personal Data

Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as: name, identification number, location data, online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. We may collect the following types of personal data:

- Name, surname, permanent and temporary address, date of birth, gender, home and work phone or GSM, work and private email address, LinkedIn profile or other similar profiles, Skype or other similar addresses, and work-related photographs.
- Tax, identification number, numbers and data from personal documents (if required), work permit number (if required) and other identification numbers.
- Employment data, duration of employment including dates, data on employers and previous employers, places of employment, data on education and training, data on recognitions, certificates and licenses, and other work-related data.

### 3. Purpose of Personal Data Processing

Your personal data will be processed for the following purposes:

- Managing the employment process,
- Assessing your suitability for the advertised job position,
- Communication related to the employment process.

Data may also be used for service improvement, which includes identifying issues with existing services, planning improvements to existing services, designing new services. We may also use surveys to assist with this.

### 4. Legal Basis for Processing

The company collects and processes personal data on the following legal bases:

- Processing is necessary to comply with a **legal obligation** to which the controller is subject;
- Processing is necessary **for the performance of a contract** to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract;
- Processing is necessary **for the purposes of the legitimate interests** pursued by the controller or a third party;
- **The data subject has given consent** to the processing of his or her personal data for one or more specific purposes;
- Processing is necessary **to protect the vital interests** of the data subject or another natural person.

### Notification of Individuals by Email

The company may inform customers, clients, and users of its services about its services, events, trainings, offers, and other content via their email address based on legitimate activity. An individual can request to

stop such communication and data processing at any time by using the unsubscribe link in the received message or by sending a request by email or regular mail to the company's address.

The legal bases for data processing are legitimate interest and consent. Data will be processed until the withdrawal of the message reception or the withdrawal of consent, or until the purpose of the processing is fulfilled. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### **Contract Performance**

When an individual enters into a contract with the company, it constitutes the legal basis for the processing of personal data. The company may process personal data for the conclusion and performance of the contract, such as the sale of goods and services, preparation of offers, participation in various programs, etc. If an individual does not provide personal data, the company cannot conclude a contract and cannot perform the service or deliver goods or other products in accordance with the contract, as it lacks the necessary data for execution.

The legal basis for data processing is the contract. The retention period is until the fulfillment of the contract's purpose or up to 6 years after the termination of the contract, except in cases of disputes between the individual and the company related to the contract. In such cases, the company retains data for 10 years after the finality of a court decision, arbitration, or court settlement, or if no court dispute occurred, 6 years from the date of amicable resolution.

### **Legitimate Interest**

The company may also process personal data based on legitimate interest. This is not permissible where such interests are overridden by the interests or fundamental rights and freedoms of the data subject that require protection of personal data. When using legitimate interest, the company conducts an assessment in accordance with the law. Processing of personal data for direct marketing purposes is considered legitimate interest.

The company may process personal data of individuals obtained from publicly accessible sources or within the framework of legitimate activity for purposes such as offering goods, services, employment, informing about benefits, events, etc. For these purposes, the company may use regular mail, phone calls, email, and other telecommunications means. For direct marketing purposes, the company may process the following personal data of individuals: name and surname, permanent or temporary residence address, phone number, and email address.

The company may process these personal data for direct marketing purposes even without the individual's explicit consent. An individual can request to stop such communication and data processing and withdraw from message reception at any time via the unsubscribe link in the received message or by sending a request by email or regular mail to the company's address.

The legal basis for data processing is legitimate interest. Data will be processed until the withdrawal of message reception, or until the purpose of processing is fulfilled. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

### **Processing Based on Consent**

If the company does not have a legal basis shown by law, contractual obligation, legitimate interest, or protection of an individual's life, it may ask the individual for consent. Thus, it can process certain personal data for the following purposes, when the individual gives consent:

- Residential address and email address (for information and communication purposes);
- Photos, videos, and other content relating to the individual (e.g., posting pictures of individuals on the website for documentation of activities and informing the public about the company's work and events);
- Other purposes agreed upon by the individual with consent.

If the individual gives consent for the processing of personal data and at some point no longer wishes to, they can request to stop the processing of personal data by sending a request via email or regular mail to the company's address. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. After receiving the withdrawal or deletion request, data will be deleted within 15 days. The company may also delete these data before the withdrawal when the purpose of data processing has been achieved or as required by law.

Exceptionally, the company may refuse a request for deletion for reasons specified in the General Regulation in cases of exercising the right to freedom of expression and information, fulfilling legal obligations of processing, reasons of public interest in public health, purposes of archiving in the public interest, scientific or historical research purposes, statistical purposes, execution, or defense of legal claims.

The legal basis for data processing is consent. Data will be processed until withdrawal or revocation of consent, or until the purpose of processing is fulfilled. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

## **5. Recipients of Personal Data**

Your personal data will only be accessible to authorized persons within our company involved in the recruitment process. We will not share your personal data with external third parties without your prior consent, except as required by legal obligations.

## **6. Retention Period of Personal Data**

Your personal data will be stored as long as necessary to fulfill the purpose of processing or until your consent is withdrawn, but no longer than 12 months after the conclusion of the recruitment process, unless a longer retention period is required by law.

## **7. Contractual Processing of Personal Data and Data Transfer**

The company may entrust individual data processing tasks to contractual processors based on a data processing agreement. Contractual processors may process entrusted data exclusively on behalf of the controller, within the limits of its authorization recorded in a written contract or other legal act, and in accordance with the purposes defined in this data protection policy.

The contractual processors with whom the company cooperates are mainly:

- Accounting services and other legal and business advisors;
- Infrastructure maintenance (security services);
- IT system maintenance;
- Email service providers and software providers, cloud services (e.g., Dropbox, Microsoft, Google, MetaView, HRP);
- Social network and online advertising providers (Google, Facebook, Instagram, Moje delo, etc.).

The company keeps a list of contractual processors for better overview and control over them and the arrangement of mutual contractual relationships.

The company will not transmit personal data to unauthorized third parties. Contractual processors may process personal data only within the company's instructions and may not use personal data for any other purposes.

The company, as the controller, and its employees do not transfer personal data to third countries (outside the EEA – EU Member States and Iceland, Norway, and Liechtenstein) and international organizations, except to the USA, where the relationships with contractual processors from the USA are regulated based on standard contractual clauses (standard contracts adopted by the European Commission) and/or binding corporate rules (adopted by the company and approved by the EU supervisory authorities).

## 8. Individual Rights

You have the right to:

- Access your personal data,
- Rectification of inaccurate or incomplete personal data,
- Erasure of personal data (right to be forgotten),
- Restriction of the processing of personal data,
- Data portability,
- Object to the processing of personal data,
- Withdraw consent (if the processing is based on consent).

To exercise your rights, please contact the data protection officer ([adriatic\\_dpo@mobilize-fs.com](mailto:adriatic_dpo@mobilize-fs.com)).

All the mentioned rights and any questions can be exercised by submitting a request to the company's address. The company will respond to the request without undue delay, no later than one month after receiving the request. This period may be extended by a maximum of two additional months, considering the complexity and number of requests, about which the individual will be informed, along with the reasons for the delay.

## 9. Right to Lodge a Complaint

If you believe that your rights regarding the protection of personal data have been violated, you have the right to lodge a complaint with the Information Commissioner of the Republic of Slovenia:

- Address: Dunajska cesta 22, 1000 Ljubljana
- Email: [gp.ip@ip-rs.si](mailto:gp.ip@ip-rs.si)
- Phone: 01 230 97 30

**Thank you for your interest in working with our company. We will handle your personal data with the utmost care and respect for your privacy.**

**Best regards,**

**RCI Lizing d.o.o, Branch in Slovenia**