

NOTICE ON PROCESSING PERSONAL DATA OF FORTENOVA GROUP EMPLOYMENT CANDIDATES

This Notice on Processing Personal Data of Fortenova Group employment candidates („**Notice**“) applies to the processing of personal data of employment candidates („**Candidates**“) performed by FORTENOVA GRUPA d.d. with registered seat in Zagreb, Marijana Čavića 1 („**Fortenova Group**“).

Fortenova Group is in charge of processing employment candidates' personal data. This Notice is intended to describe who we are, what categories of your personal data we process, how and for what purpose we process them, how we protect your personal data and what rights you have in connection with our processing of your personal data.

1. WHAT CATEGORIES OF CANDIDATES' PERSONAL DATA ARE BEING COLLECTED AND PROCESSED BY FORTENOVA GROUP?

Fortenova Group collects the following personal data categories of its employment candidates:

Identification data	Given and family name, date and place of birth and the like.
Contact data	Email address, phone number, permanent/temporary residence data and the like.
Professional qualification and work experience data	CV provided by the candidate, proof of respective level of education (degree photocopy and the like), proof of work experience in specific jobs etc.
Other data voluntarily provided by the candidate	Your opinions, applications and information provided to Fortenova Group via email or regular mail or during personal or telephone conversation and so on.

Fortenova Group does in principle not collect specific categories of employment candidates' personal data. However, along with the documentation submitted in the job application some candidates may also provide some personal data that constitute a specific category, such as a photograph or information that the person is disabled.

2. FOR WHAT PURPOSE DOES FORTENOVA GROUP PROCESS CANDIDATES' PERSONAL DATA?

Fortenova Group processes employment candidates' personal data for the following purposes:

a. To select the candidate we will employ

Fortenova Group primarily processes personal data of candidates in order to find whether the candidates meet all conditions for the job they apply for and possibly to check the candidates' abilities by way of testing and/or job interviews. Depending on the job, the testing may involve foreign language proficiency, IT skills or other specific knowledge and skills checks.

Such checks enable the Fortenova Group to employ a candidate who meets all the conditions stated in the recruitment advertisement and who achieved the best results in the tests and the interview.

To this end Fortenova Group processes candidates' identification, qualification and work experience data as well as other information proving that the candidate meets all conditions for the respective job. Fortenova Group may also check the candidates' professional and other working abilities, in writing or by interviewing the candidate.

In the aforesaid case Fortenova Group processes candidates' personal data because such processing is necessary in order for Fortenova Group to take appropriate actions upon the candidate's request prior to closing the contract.

b. To communicate with the candidates regarding their job application

If a candidate applied for a job with Fortenova Group, their personal data will be used by Fortenova Group to communicate with the candidate and possibly inform them of the status of their job application. Fortenova Group may also use candidates' personal data to reply to their queries.

To this end Fortenova Group processes candidates' identification data and their contact data.

In the aforesaid case Fortenova Group processes candidates' personal data because such processing is necessary in order for Fortenova Group to take appropriate actions upon the candidate's request prior to closing the contract.

c. To possibly establish an employment relation with the candidate

In case Fortenova Group should decide to employ the candidate, Fortenova Group shall process the candidate's personal data collected during the job application and recruitment process in order to be able to prepare and close an employment contract with the candidate. Once the employment contract is closed, the candidate's data shall be stored in the records that Fortenova Group is obliged to keep on its employees in compliance with labor relation regulations.

To this end Fortenova Group collects candidates' identification and contact data as well as other data relevant for the establishment of an employment relation with Fortenova Group.

In the aforesaid case Fortenova Group processes the candidate's personal data because such processing is necessary to close and execute the labor contract that Fortenova Group concludes with

the candidate and in order for Fortenova Group to take appropriate actions upon the candidate's request prior to closing the contract.

d. To meet Fortenova Group's statutory obligations

Sometimes Fortenova Group processes candidates' personal data to comply with the law and other regulations, ie. to meet the legal obligations of Fortenova Group as the one in charge of processing. Such obligations may be related to human resources management and keeping appropriate records, non-discrimination provisions, giving advantage to certain persons in the process of employment and the like.

Pursuant to laws and other regulations Fortenova Group may be obliged to submit candidates' personal data to other state or supervising authorities.

To this end Fortenova Group processes identification data, contact data, qualification and work experience data and other information and documents proving that the candidate meets the conditions for a specific job.

In the aforesaid case Fortenova Group processes candidates' personal data, as such processing is necessary in order to comply with legal obligations.

e. For the sake of potential future employment of candidates who have not been selected

In case Fortenova Group decides to employ another candidate, the personal data of an applying candidate collected during the application process will only be kept by Fortenova Group if the candidate who has not been selected gives his or her consent. Such data shall be processed by Fortenova Group for the purpose of a potential future employment and contacting of the candidate.

In the aforesaid case Fortenova Group processes the candidate's personal data because such processing is based on the candidate's consent.

3. FOR HOW LONG DOES FORTENOVA GROUP RETAIN CANDIDATES' PERSONAL DATA?

Fortenova Group retains the personal data of candidates for as long as required to achieve the aforesaid purposes, ie. the selection of a candidate for a particular job and conclusion of an employment contract with the selected candidate, not longer than 30 days upon completion of the job application process.

If Fortenova Group does not employ a candidate, such candidate may request from Fortenova Group to return the documentation provided during the job application.

Subject to the candidate's consent Fortenova Group shall retain the candidate's personal data for an additional period of one year as of the day of closing the job application process, for the purpose of selecting the candidate and communicating with them during a possible future employment process.

The retention periods and other rules of keeping personal data are set forth in the Personal Data Retention Policy of Fortenova Group.

Once the time required or stipulated for the personal data processing has lapsed, Fortenova Group shall safely delete or destroy the personal data of its employment candidates.

4. WHO HAS ACCESS TO CANDIDATES' PERSONAL DATA?

Access to personal data of employment candidates may be given to Fortenova Group workers involved in the recruitment process who have limited rights of accessing and processing data for the purpose of performing their respective job, particularly employees of the Human Resource Management Division and the Selection and Career Development Department.

Fortenova Group workers authorized to access or otherwise process candidates' personal data are obliged to keep such personal data confidential and act in accordance with privacy notices, policies, procedures and other internal acts as well as contractually assumed obligations of Fortenova Group.

To the extent this is required for the purpose of employing candidates with Fortenova Group or to meet Fortenova Group's statutory obligations, candidates' personal data may be provided to third party recipients such as the Ministry of Internal Affairs, Croatian Employment Agency etc.

In some cases personal data may be transferred to countries outside the European Union and the European economic area, that have different and possibly lower data protection standards than those set forth in the Republic of Croatia. In such case Fortenova Group shall take appropriate protection measures in order to provide for the appropriate protection of your personal data. Such protection measures include the closing of contracts approved for this purpose by the European Commission (use of so-called standard contractual clauses for the transfer of personal data to third countries).

5. HOW ARE CANDIDATES' PERSONAL DATA PROTECTED?

In order to protect the personal data of candidates, Fortenova Group takes appropriate protection measures in compliance with the applicable privacy and data protection regulations.

This also includes the requirement towards Fortenova Group service providers to take appropriate measures in order to protect the confidentiality and security of candidates' personal data.

In its operations Fortenova Group has implemented technical, physical and organizational measures for the protection of candidates' personal data from accidental or illicit destruction, accidental loss, damage, change, unauthorized disclosure or access as well as from any other form of illicit and/or excessive processing.

6. WHAT RIGHTS DO CANDIDATES HAVE AND HOW CAN THOSE BE EXERCISED?

Within the scope of personal data protection candidates have the following rights:

- a. Right to access their personal data, ie. the right to request confirmation as to whether their personal data are being processed and if so, the right to request access to and information on the processing and a copy of the personal data that are being processed;
- b. Right to correct inaccurate and amend incomplete data;

- c. Right to delete personal data, particularly if such data are not necessary any more with regards to the purpose for which they were collected, if they have been illicitly processed, if there is an obligation to delete them in order to comply with statutory obligations or if the given consent has been withdrawn;
- d. Right to limitation of personal data processing;
- e. Right to lodge a complaint against the processing of personal data;
- f. Right to file a complaint with the Personal Data Protection Agency.

Fortenova Group shall take all measures to ensure that candidates are able to exercise the aforesaid rights, but in certain cases these rights may be limited or excluded.

7. TO WHOM CAN YOU ADDRESS YOUR QUERIES RELATED TO PERSONAL DATA PROTECTION?

For any additional information please do not hesitate to contact Fortenova Group via email sent to the attention of the data protection officer at the address: zastita.podataka@fortenovagrupa.hr.

8. CHANGE OF NOTICE AND CLEANSED VERSION

This Notice applies as of 1 April 2019 and is subject to change from time to time.

The latest version hereof, that shall always apply to the candidates' personal data processing, is available at the link <https://www.fortenovagrupa.hr>.