

NOTICE ON PROCESSING PERSONAL DATA OF FORTENOVA GROUP EMPLOYMENT CANDIDATES

This Notice on Processing Personal Data of Fortenova Group Employment Candidates („**Notice**“) shall apply 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**“) in the selection/recruitment process of Fortenova grupa d.d. and in certain cases in the selection/recruitment process of Fortenova Group’s subsidiary and affiliated companies.

Fortenova Group is the data controller of the employment candidates’ personal data. This Notice is intended to describe who we are, which categories of your personal data we process, how and for which 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. WHICH CATEGORIES OF CANDIDATES’ PERSONAL DATA ARE BEING COLLECTED AND PROCESSED BY FORTENOVA GROUP?

Fortenova Group collects the following categories of candidates’ personal data:

Identification data	Given and family name, date and place of birth etc.
Contact data	Email address, phone number, permanent/temporary residence data etc.
Data on qualification and work experience	CV provided by the candidate, proof of the appropriate professional education (copy of degree and the like), proof of relevant work experience etc.
Other data voluntarily provided by candidate	Your opinions, petitions and information provided to Fortenova Group via email or letter or during the interview conducted in person or via telephone etc.

Fortenova Group, in principle, does not collect special categories of personal data about employment candidates. It may, however, be possible that some candidates, as part of the documentation provided in their job application, also provide some personal data falling into the special personal data category, such as, for example, a photo or the note that the person in question is a person with disabilities.

2. FOR WHICH PURPOSES DOES FORTENOVA GROUP PROCESS CANDIDATES’ PERSONAL DATA?

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

a. To select the candidate that we will employ

Fortenova Group primarily processes employment candidates' personal data in order to verify whether the candidates meet all the conditions for the job they applied for and to possibly also check the candidate's abilities via testing and/or job interviews. Depending on the respective job position, the testing may include foreign language knowledge, IT skills or other special knowledge and skills checks.

Such checks enable Fortenova Group to employ a candidate that meets all the conditions stated in the job vacancy advertisement and scored the best results in the testing and interview.

To that end, Fortenova Group shall process the candidates' identification data, job qualification and work experience data as well as other data proving that the candidate meets the conditions for the job in question. Fortenova Group may as well perform a check of the candidate's professional and other work abilities, whether in writing or via interview with the respective candidate.

In the aforementioned case, Fortenova Group shall process the candidate's personal data because such processing is necessary for Fortenova Group to take the appropriate actions upon request of the candidate prior to closing the contract.

b. To communicate with the candidates regarding their job application

If a candidate applied for a job at Fortenova Group, their personal data shall be used by Fortenova Group to communicate with the candidate and to possibly inform them of the status of their job application. Fortenova Group may as well use the candidate's personal data in order to respond to their queries.

To that end, Fortenova Group shall process the candidate's identification data and their contact details.

In the aforementioned case, Fortenova Group shall process the candidate's personal data because such processing is necessary for Fortenova Group to take the appropriate actions upon request of the candidate prior to closing the contract.

c. To possibly establish an employment relationship with the candidate

In case Fortenova Group should decide to employ a candidate, the respective candidate's personal data collected in the job application and over the course of the recruitment process shall be processed by Fortenova Group in order for it to prepare and close an employment contract with the candidate. Once the employment contract is closed, the candidate's data shall be filed in the records that Fortenova Group is obligated to keep about its workers in accordance with the labour regulations.

To that end, Fortenova Group shall collect the candidate's identification data and contact details as well as other data relevant to establishing an employment with Fortenova Group.

In the aforementioned case, Fortenova Group shall process the candidate's personal data because such processing is necessary for closing and executing the employment contract that Fortenova Group closes with the candidate and for Fortenova Group to take the appropriate actions upon request of the candidate prior to closing the contract.

d. To meet Fortenova Group's legal obligations

Sometimes Fortenova Group shall process candidates' personal data in order to adhere to the laws and other regulatory requirements, i.e. in order to meet Fortenova Group's legal obligations as data controller. Such obligations may be related to human resources management and keeping appropriate records, non-discrimination, advantage to be given to certain persons in getting employed etc.

It is possible that pursuant to laws or other regulations Fortenova Group may be obligated to forward candidates' personal data to other state and/or supervisory authorities.

To that end, Fortenova Group shall process identification data, contact details, qualification and work experience data as well as other data and documents proving that the candidate meets the conditions for the respective job position.

In the aforementioned case Fortenova Group shall process the candidate's personal data because such processing is necessary in order to adhere to their legal obligations.

e. To potentially employ currently not selected candidates in the future

In case Fortenova Group should decide to employ another candidate, Fortenova Group shall retain the personal data of a job applicant collected over the course of their job application and share them with its subsidiary and affiliated companies only subject to the non-selected applicant having given their consent. Such data shall be processed by Fortenova Group for the purposes of their potential future employment with Fortenova Group or its subsidiary and affiliated companies and of contacting the candidate.

In the aforementioned case, Fortenova Group shall process the candidate's personal data as such processing is based on the data subject's consent.

f. To participate in the selection and recruitment procedure of candidates in leadership positions at subsidiary and affiliated companies

In case of employing candidates in leadership positions at subsidiary and affiliated companies, sometimes personal data of those candidates are transferred within Fortenova Group, as Fortenova Group takes part in the selection process of such candidates.

In the aforementioned case, Fortenova Group shall process the personal data of the respective candidates because such processing is necessary in order for Fortenova Group to exercise its legitimate interest as the holding company to adequately manage the human resources of Fortenova Group companies, which includes the organization of processes related to the establishment and cessation of employments, as well as the legitimate interest to transfer personal data among the companies and Fortenova Group (as a group of entrepreneurs) for internal administration purposes.

3. FOR HOW LONG SHALL FORTENOVA GROUP RETAIN PERSONAL DATA OF CANDIDATES?

Fortenova Group shall retain the personal data of employment candidates for as long as it is required to achieve the aforesaid purposes, i.e. until selecting the candidate for the respective job and closing an employment contract with the selected candidate, and not later than 30 days after completing the job recruitment process.

If Fortenova Group does not employ a candidate, the candidate may request Fortenova Group to return their documentation provided over the job application process.

Subject to the candidate's consent, Fortenova Group shall retain the candidate's personal data for a further period of one year as of the date of closing the recruitment process, for the purpose of selecting candidates and communicating in case of a possible future recruitment at Fortenova Group or its subsidiary or affiliated companies.

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

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

4. WHO HAS ACCESS TO CANDIDATES' PERSONAL DATA?

Access to personal data of employment candidates may be given on a need-to-know basis to workers of Fortenova Group and its subsidiary and affiliated companies who participate in the recruitment process and have limited rights of accessing and processing data for the purpose of performing their respective job, particularly employees of the Human Resources Area, Selection and Career Development Department.

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

To the extent this is necessary and permitted by regulations, or subject to the respective candidate's consent, in order to achieve the purpose for which the personal data have been collected and/or processed, Fortenova Group may share them with third party recipients such as:

- a. Fortenova Group subsidiary and affiliated companies;
- b. Service providers who provide specific services to Fortenova Group pursuant to special contracts, which may include the processing of personal data of employment candidates, e.g. personnel service providers etc.
- c. Public and state authorities such as the Ministry of Internal Affairs, the Croatian Employment Service and the like.

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 in accordance with forms 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 THE EMPLOYMENT CANDIDATES' PERSONAL DATA PROTECTED?

In order to protect the personal data of employment candidates, Fortenova Group shall take 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. WHICH RIGHTS DO EMPLOYMENT CANDIDATES HAVE AND HOW CAN THOSE BE EXERCISED?

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

- a. Right to access their personal data, i.e. the right to request confirmation as to whether their personal data have been processed and if so, the right to request access to and information on the processing and a copy of the personal data that have been processed;
- b. Right to correct inaccurate and amend incomplete data;
- c. Right to erase 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 erase them in order to comply with statutory obligations or if the given consent has been withdrawn;
- d. Right to the limitation of personal data processing;
- e. Right to raise an objection against the processing of personal data;
- f. Right to file a complaint with Fortenova Group for personal data protection.

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

7. TO WHOM CAN YOUR QUERIES RELATED TO PERSONAL DATA PROTECTION BE ADDRESSED?

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. AMENDMENTS TO THE NOTICE AND CLEANSED VERSION

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

The latest updated version hereof, dated 24th December 2024, is available at the link <https://www.fortenovagrupa.hr>.