

## PRIVACY POLICY FOR RECRUITMENT

**AS Reach-U** (hereinafter **Reach-U**) hereby commutes to you clearly and conclusively how Reach-U processes your personal information when you apply to a job. Reach-U is the controller of your personal data. If you cannot find the answers you're looking for in our Privacy Policy or have any other questions regarding your personal data, please do not hesitate to contact Reach-U by e-mail [career@reach-u.com](mailto:career@reach-u.com) or by mail Riia tn 24, Tartu 51010, Estonia.

1. What kind of personal data does Reach-U collect?
  1. basic identification data (first and last name);
  2. data in the CV and/or the motivation letter;
  3. data collected during the interview;
  4. social media profile or other profile data if the candidate submits the application via such portal (LinkedIn, CV Online, etc.).
2. How does Reach-U collect the personal data?
  1. We collect your data when you apply for a job at Reach-U and provide us the data during recruitment process;
  2. We collect your data when you connect with us through social media services (Twitter, LinkedIn, Facebook, CV Online, etc.);
3. What are the purposes of the processing?
  1. The purpose of processing activities is to assess the suitability of the candidate for the job position, select the most suitable candidate and contact him or her to start negotiating a contract. Reach-U will process your data strictly in relation to recruitment related activities. Reach-U processes your data to set up and conduct interviews or tests.
  2. The processing is necessary for the purposes of the legitimate interests pursued by Reach-U. Reach-U's legitimate interest is to collect information on candidates, evaluate the candidates and select a suitable candidate. Reach-U will consider whether such legitimate interests might be overridden by the interests or fundamental rights and freedoms of the candidate. If a candidate has been selected, the processing is necessary in order to take steps prior to entering into a contract.
  3. Reach-U can process your personal data if you have given consent to the processing of your personal data for one or more specific purposes. For example, you can consent to retaining your data for future recruitment processes. You have the right to withdraw your consent at any time. However, we remind you that the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
4. Where we store and process personal data?
  1. We generally process your personal data in the European Union. We place great importance on the security of all personal data. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control.
  2. If any of the data is transferred to a third country, we implement appropriate safeguards and means, such as the EU-U.S. Privacy Shield Framework (<https://www.privacyshield.gov/welcome>) or standard contractual clauses. We make sure that conditions to enforce your rights and effective legal remedies are available.
5. How long do we retain your personal data?
  1. Reach-U will retain the personal data of the candidate collected during the recruitment process for one year from the end of the recruitment process (announcement of the results).

2. If you consent to retaining your data for future recruitment processes, Reach-U will retain the personal data as long as your consent is valid or until the information is no longer relevant (only if this occurs before the withdrawal of consent).
6. To whom and why we transfer your personal data?
  1. Reach-U discloses personal information only to the extent and in the form necessary for the fulfilment of the purposes listed in the Privacy Policy.
  2. Reach-U may share information with companies that provide support services to Reach-U (external recruiters e-mail and data hosting services). Data processors are not authorized to use the shared data for any other purpose.
  3. Reach-U is required to transfer personal data if Reach-U is legally bound by such an obligation. For example, Reach-U might be obligated to disclose personal data to public authorities upon their legitimate request.
7. What are your rights as a data subject?
  1. You have the right to receive information about the personal data processed by Reach-U, including the categories of data processed, the sources of the data, purposes of processing *etc.* You are also entitled to receive copies and extracts of personal data processed. You have the right to request the correction or updating of data if it turns out that the personal data being processed is inaccurate.
  2. You have the right on to object to processing, on grounds relating to your particular situation, at any time to processing of personal data concerning you if such processing is only necessary for the purposes of the legitimate interests pursued by Reach-U.
  3. You have the right to obtain from Reach-U restriction of processing or the erasure of your personal data Reach-U will erase your data or implement other measures that result in the data becoming permanently anonymous if:
    1. your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
    2. you withdraw the consent on which the processing is based and there is no other legal ground for the processing;
    3. you object to the processing and there are no overriding legitimate grounds for the processing;
    4. your personal data have been unlawfully processed;
    5. your personal data have to be erased for compliance with a legal obligation to which Reach-U is subject.
  4. Reach-U will fulfill your request within a reasonable time, but no later than one month after receiving the request.

In case of any suspected infringement of your privacy, please contact. We'll try to resolve the dispute by negotiation. However, you also have the right to lodge a complaint to the supervisory authority. In Estonia the supervisory authority is Estonian Data Protection Inspectorate located at Väike-Ameerika St. 19, 10129 Tallinn and online [www.aki.ee](http://www.aki.ee).

This Privacy Policy was last updated on 10.06.2020