

PRIVACY POLICY OF FINĖJAS, UAB

In this document, we provide mandatory information on the processing of personal data by the controller Finėjas, UAB (organization identification number 161345841, address Kauno g. 55, Vievis, Lithuania) in accordance with the EU's General Data Protection Regulation (GDPR) (hereinafter referred to as the Regulation). The following information includes three data processing objectives: (i) processing of personal data of jobseekers participating in the selection; (ii) administration of complaints, inquiries, and feedback; (iii) communication by e-mail. This document also describes the rights of your data subject, the provision of data to their recipients, and other conditions for processing personal data applicable to all personal data processed for the above purposes.

Processing of personal data of jobseekers participating in the selection

If you sent your resume (CV) as per the ad concerning the selection to a specific position published on our website or special website designed for the staff selection and job search, we will process personal data submitted by you voluntarily as well as such other personal data, as listed below, for the purpose of staff selection.

Your personal data will be processed until the selection is completed, i.e. until our decision to employ a particular candidate, the end of his/her probationary period, or our decision to finish the selection without selecting any candidate. This period should not exceed 4 months. After the selection, your personal data will be destroyed, unless you consent to further storage of your data for future selections. If you agree to the storage of your data by us after the end of the selection, please inform us by e-mail. If you give such consent, we will store your data for 6 years and we will contact you if, during this period, our company is in need of a new employee. Your personal data will be destroyed after 6 years.

Your personal data will be processed on the basis of your consent to take part in the selection process and for further storage, also on the basis of the duties and rights provided for by law.

This is to inform you that, by exercising the right granted to us by legal acts governing the protection of personal data, we have the right to apply and contact your previous employers and ask for their opinion about your qualifications, professional competences and business-related traits. However, we will not contact your existing employer without your explicit prior consent.

Administration of the database of jobseekers

Even if we do not search for employees and organize the selection, you can submit your resume (CV) and other data in order to keep them in our database. We will protect your personal data for 6 years and, if during this period, our company will need a new employee, we will contact you and invite you to take part in the selection. Your personal data will be destroyed after 6 years.

Your personal data will be processed on the basis of your consent, also on the basis of the duties and rights provided for by law.

This is to inform you that, by exercising the right granted to us by legal acts governing the protection of personal data, we have the right to apply and contact your previous employers and ask for their opinion about your qualifications, professional competences and business-related traits. However, we will not contact your existing employer without your explicit prior consent.

Administration of complaints, inquiries, and feedback

If you submit a complaint, inquiry, or feedback to our company through a form found on our website, directly to the company's e-mail, or otherwise, your personal data submitted by you voluntarily will be processed for the purposes of administration of such complaint, inquiry, or feedback.

If your complaint relates to a potential dispute, possible damage, etc., your personal data can be stored for a maximum period of 10 years. If personal data are not related to a possible dispute, we will destroy them in a shorter period of time.

The processing of your personal data will be based on the expression of your free will, i.e. consent; however, in some cases a legal act may become the basis for further storage of the complaint.

Communication by e-mail

According to the Regulation, the content of correspondence by e-mail is considered to be personal data, even if the correspondence takes place between the employees of legal entities. In view of this, we will apply the rules for the processing of personal data under the Regulation to the content of the communication as well as to the email addresses.

The basis for the processing of your personal data is the expression of your free will to correspond and to provide certain information in correspondence, i.e. consent. In addition, the processing of data may also be based on performance of a contract and performance of statutory obligations.

Your e-mail address, the content of correspondence, and related data will be processed in accordance with the principle of proportionality. This data will first be visible to our employee directly communicating with you. However, in some cases, your correspondence may also be read by other employees of our company, for example, in the course of an investigation of the internal administration, possible breach of legal acts or internal rules of procedure, substitution of the employee, and for other related purposes.

Provision of personal data to the data recipients

We can provide your personal data to:

- IT, server, mail, archiving, bookkeeping service providers;
- Companies in the same group;
- Notaries public, bailiffs, lawyers, consultants, auditors;
- Law enforcement agencies, courts, other dispute resolution bodies;
- Insurance companies;
- Potential or existing successors of our business or any share thereof, or their authorized consultants or persons.

What are the principles of protection of personal data that we follow?

By collecting and using personal data entrusted to us by you, also personal data received from other sources, we adhere to the following principles:

- Your personal data is processed in a lawful, fair, and transparent manner (principle of legality, good faith, and transparency);
- Your personal data is collected for specified, clearly defined, and legitimate purposes, and will not continue to be processed in a way not compatible with such purposes (purpose limitation principle);

- Your personal data is adequate, appropriate, and necessary only for the purposes, for which it is processed (the principle of data reduction);
- Personal data processed is accurate and, if necessary, it is being updated (accuracy principle);
- Your personal data is kept in such a way that a person could be identified for no longer than is necessary for the purposes, for which your personal data is processed (storage limitation principle);
- Your personal data is processed in a way to ensure the adequate protection of personal data where applying respective technical or organizational measures, including the protection against unauthorized processing or processing of unauthorized data and the unintentional loss, destruction, or damage (integrity and confidentiality principle).

Implementation of data subject's rights

We inform you that you have the following data subject's rights: the right of access to personal data and information on how they are processed; the right to have personal data rectified or, taking into account the purposes of the processing of personal data, the right to have incomplete personal data completed; the right to request to destroy personal data or suspend the data processing actions (except for storage); the right to request that the processing of personal data be restricted; the right to data portability; the right to lodge a complaint to the State Data Protection Inspectorate; the right to withdraw the consent.

In order to implement our data subject's rights, we will have to identify you. If we do not identify you, we will not know, if we are addressed by a person, whose personal data we process, and, therefore, we will not be able to exercise your rights.

We may refuse to process the request for the implementation of the rights received from you or we may ask for a corresponding fee, if the request is of manifestly unfounded or excessive character, as well as in other cases provided by law.

If you would like to exercise your data subject's rights or if you have other questions regarding the processing of your personal data, please contact us by e-mail: info@finejas.it.