



**Personal data processing
notice to candidates,
trainees and other data
subjects involved in
personnel selection
process**



This notice provides information on how JSC "LPB Bank" (hereinafter referred to as the Bank) performs the processing of personal data of candidates and trainees (hereinafter referred to as Candidates) and other data subjects involved in personnel selection whose data may become available to the Bank within the framework of its personnel selection processes in accordance with the General Data Protection Regulation.

The purpose of this Notice is to enable Candidates, and other individuals whose data are provided to the Bank by Candidates (for example reference/performance record providers' data) to get acquainted with the detailed terms of personal data processing performed by the Bank as part of its personnel selection process, in addition to the provisions of the Notice to Data subjects regarding the Processing of Personal data by LPB Bank (previously - LPB Bank Personal Data Processing Policy).

Controller – the Bank, registration No. 50103189561, registered office: Brivibas street 54, Riga, LV-1011, telephone number: (+371) 6 777 2 999, e-mail address: info@lpb.lv, website: www.lpb.lv.

1. Personal data

1.1. Any of the following is considered a Candidate's personal data:

1.1.1. information stated regarding the Candidate **in the Candidate's application letter and/or CV to apply for a job with the Bank**, for example, name, surname, personal identification code, work and educational/training experience, language skills, additional knowledge/skills, telephone number, e-mail address, Skype user name, photograph, or other information identifying the Candidate;

1.1.2. information regarding the Candidate **obtained from third parties**, including information received by the Bank to, where necessary, verify the Candidate's compliance with Section 34.⁵ of the Credit Institution Law and Section 10.¹ of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing, as well as information provided to the Bank by the parties providing references or performance records on the Candidate;

1.1.3. information **obtained during communication with the Candidate or during the job interview** (including the appearance and conduct of the data subject, the language of communication, information on education, work experience, etc.);

1.1.4. information pertaining to the **evaluation** of the Candidate's suitability for a job vacancy to which the Candidate has applied to.

1.2. The personal data of parties providing references and performance records stated in a Candidate's application letter and/or CV being processed by the Bank are: name, surname, employer, and job title, contact information (telephone number, e-mail address, etc.).

2. Purpose and legal basis for processing Candidate's personal data

2.1. Any of Candidate's personal data submitted to the Bank or obtained by the Bank are processed for personnel selection purposes, i.e. for evaluating Candidate's suitability for a given position, and for communication with the Candidate in

accordance with applicable personal data protection regulations, this purpose also is specified in the Bank's job advertisements.

2.2. Candidate may freely choose whether to apply for a job vacancy advertised by the Bank and whether to submit their application letter and/or CV to the Bank. Candidate's submission of application letter and/or CV is considered as consent for the processing of the Candidate's personal data that are in the submitted documents. The Bank will cease reviewing a Candidate's application if it receives the Candidate's withdrawal of consent. The Candidate is personally liable for the accuracy of personal data specified in their application letter and/or CV.

2.3. The legal basis of personal data processing for purposes of personnel selection consists of:

2.3.1. the **data subject's consent** (General Data Protection Regulation Article 6(1a)) – regarding the processing of personal data provided by the Candidate (via the CV, application letter, job interview, etc.) for the purposes stated in this Notice;

2.3.2. **fulfilment of the Bank's legal obligation** (General Data Protection Regulation Article 6(1c)):

2.3.2.1. in cases where applicable regulations specify an obligation to obtain information regarding the Candidate that is applying for a specific job vacancy (for example to verify compliance with the provisions of Section 34.⁵ of the Credit Institution Law and Section 10.¹ of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing);

2.3.2.2. processing requests and complaints of data subjects, or request from law enforcement agencies and supervisory authorities, pertaining to the personnel selection process;

2.3.3. the **Bank's legitimate interests** (General Data Protection Regulation Article 6(1f)):

2.3.3.1. processing Candidate's personal data as obtained by the Bank from Candidates' CV's sourced from job seekers' websites;

2.3.3.2. processing Candidate's personal data to evaluate the Candidate's suitability for a vacancy, including the personal data stated in the Candidate's application letter and/or CV or obtained from third parties or during job interviews;

2.3.3.3. securing the protection of the Bank's rights and interests where a Candidate's personal data are processed in connection with a filed claim regarding violations during personnel selection process;

2.3.3.4. processing the personal data of providers of references and performance records as indicated by Candidates;

2.3.3.5. storing the personal data of data subjects involved in personnel selection process for a duration that secures the adequate protection of the Bank's rights and interests.

3. Access to personal data and sources of personal data

3.1. All personal data specified in a Candidate's application letter and/or CV are available solely to Employees of the Bank that are responsible for selecting and evaluating job applicants, in accordance with the specifications of their duties, in

compliance with the provisions of personal data protection and other applicable regulations.

3.2. Personal data may be sourced from Candidates or from third parties maintaining registers (for example the Criminal Register or the Insolvency Register) or from the providers of references/performance records indicated by the Candidate.

3.3. The Bank receives the personal data from providers of references/performance records from third parties – the Candidates, which as controllers are responsible for the existence of an adequate legal basis to provide such personal data to the Bank.

4. Possibility of personal data being transferred outside European Union (EU) or European Economic Area (EEA) member states

The Bank does not transfer personal data of data subjects involved in the Bank's personnel selection processes for processing outside of the Bank, since there is no legal basis for doing so as stated in this Notice. The Bank has no basis for the transfer of personal data to countries outside the European Union or the European Economic Area.

5. Retention, processing and deletion of personal data

5.1. The Bank retains Candidate's personal data in accordance with the format that they were provided, i.e. in electronic or paper document format.

5.2. If Candidate is not hired for the position at the Bank to which the Candidate applied to or for which the Candidate was evaluated, the Bank deletes the Candidate's electronically submitted data and all information that was obtained and destroys documents received in paper format within a certain period of time after the legal basis for processing, i.e. the conclusion of personnel selection process and the expiration of the appeal period set in applicable regulations has passed.

5.3. If Candidate is not hired for the position at the Bank to which the Candidate has applied to but provides written consent to their application and/or CV being evaluated if another similar position becomes available, the Candidate's personal data and documents related to personnel selection are retained for 1 year following a provision of consent.

5.4. If the Bank has requested information on Candidate as determined by the applicable regulations from the Criminal Register or the Insolvency Register, the Candidate's personal data and documents pertaining to personnel selection are retained for 1 year following completion of the personnel selection process.

5.5. If Candidate has filed a claim in the court regarding the execution or outcome of the personnel selection process, the documents and personal data are retained until a final court ruling in the relevant case enters into force.

5.6. If the Bank receives Candidate's application letter and/or CV without the Candidate applying for a specific job vacancy advertised by the Bank, the Bank retains the aforementioned documents for 1 year following receipt, unless a shorter storage period is stated in the application.

5.7. A period of retention consistent with the storage of a Candidate's personal data in each of the aforementioned cases also applies to the personal data of providers of references/performance records indicated by the Candidate.

5.8. If, following conclusion of the personnel selection process, a Candidate is hired for the job at the Bank, information on the Candidate obtained within the framework

of personnel selection processes is retained together with the personnel file of the employee according to its specific storage period.

5.9. The Bank does not make automated decisions or perform profiling based on the personal data available in the personnel selection process.

6. Procedure by which Candidate or other persons involved in personnel selection process can exercise their data subject's rights

6.1. A data subject involved in personnel selection process is entitled to the following as regards the processing of their personal data:

6.1.1. to receive information on whether the Bank processes (or does not process) the personal data; in the case the Bank processes data, the data subject has also the right to access their data and to receive the information stated in the Notice to Data subjects regarding the Processing of Personal data by LPB Bank (previously - LPB Bank Personal Data Processing Policy);

6.1.2. to withdraw previously given consent to process personal data. The withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal and the Bank continues to retain data as stated in Section 5 of this Notice;

6.1.3. to request the rectification of personal data if they are inaccurate or incorrect;

6.1.4. to request the deletion of personal data if they are being processed solely on the basis of the data subject's consent, and consent is being withdrawn, or the personal data are no longer necessary for the purposes for which they were provided or for purposes compatible with such, or if the data processing is considered illegal (i.e. being performed without legal basis);

6.1.5. to request all of the information available about the data subject on the source of the data, provided that the personal data are not sourced from the data subject;

6.1.6. to file a complaint with the Data State Inspectorate (address: Elijas street 17, Riga, LV-1050, e-mail: pasts@dvi.gov.lv, telephone number: +371 67 22 31 31) if the data subject believes that the processing of their personal data by the Bank is not compliant with the provisions of the General Data Protection Regulation.

6.2. To exercise any of the rights stated in sections 6.1.1–6.1.5 of this Notice, a data subject must submit a written request to the Bank in one of the following ways:


6.2.1. in person, at the Bank's Client service centre, at Brivibas street 54, Riga, upon presenting an identification document (passport or identity card);

6.2.2. electronically, by sending an e-mail signed using a secure electronic signature, to the Bank's e-mail address: datuaizsardziba@lpb.lv.

6.3. The Bank reviews data subject's request and provides a response within no more than one month following the date of receipt of the request. The Bank has the right to extend that period by two months, considering the complexity and number of requests. The Bank will inform the data subject of such extensions.

7. Contact information for matters pertaining to personal data processing

7.1. The Bank has appointed a data protection officer, who supervises the compliance of personal data processing by the Bank as the controller with the provisions of the General Data Protection Regulation, the Law on the Processing of Personal Data, and



other applicable regulations. The data protection officer may be contacted with questions, requests and complaints regarding the personal data processing performed by the Bank. Data protection officer e-mail address: datuaizsardziba@lpb.lv or address for correspondence: Brivibas street 54, Riga, LV-1011, with the reference to JSC "LPB Bank" Data Protection Officer.

7.2. Complaints regarding personal data processing should be submitted in accordance with the Procedure of reviewing disputes, claims, complaints and their withdrawals as specified in the Bank's General Terms of Service.