



Privacy Notice for Potential Employees

Privacy Notice regarding the processing of the personal data of potential employees

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process for vacancy filling in CMMI Cyprus Marine and Maritime Institute (hereby referred to as **CMMI** or **company** or **we**). We are required to notify you of this information, under data protection legislation.

We would like to ensure you that CMMI handles your personal information with respect to your personality and your rights and in accordance with Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the **Regulation**). This Notice addresses all natural persons who are interested in applying for a position at CMMI and/or in having any employment relationship with CMMI.

Personal data means any information about you, that could identify you directly or indirectly, such as your name, ID number, phone number.

Processing means any operation or set of operations performed on personal data, by automated means or otherwise, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

1. Who collects and holds your personal data (Controller)?

Company name: CMMI Cyprus Marine and Maritime Institute
Register Number: HE 396180

Address: 38 Athinon Street, Demotiko Megaro
6300, Larnaca, Cyprus
Telephone: 24506100
E-Mail: info@cmmi.blue

2. Who is DPO?

Data Protection Officer:

Harris Kyriakides LLC
Address: 115 Faneromenis Avenue, Antouanettas Building, 6031 Larnaca.
Telephone: +357 24 201600
Fax: +357 24 201601

E-mail: info@cmmi.blue.

3. About the information we collect and hold:

3.1. What information

We may collect the following information during your recruitment:

- Your name, surname, your contact details (i.e. address, fixed and mobile phone numbers, email address).
- Details of your qualifications, experience, (including CV, academic or educational degrees).
- Your nationality and date of birth.
- Details of your references.

We may collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including your salary.
- Information regarding your academic and professional qualifications.
- Your nationality, next of kin, marital status, SI and TIC number and health report.
- Copy of your ID or passport.

3.2. How we collect the information

We may collect this information from you and your CV. We may also collect such information from third parties such as former employers (details of whom are publicly available or you have provided in your CV).

3.3. Why we collect the information and how we use it

We will typically collect and use this information for the following purposes:

- to take the necessary steps to enter into a contract; and
- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

3.4. Who we share your data with?

We may need to share some of the above categories of personal data with other parties, such as Harris Kyriakides LLC Human Resources Department and Evalion Talent Management. The recipient of the data will be bound by confidentiality obligations.

4. The purpose for processing your Personal Data and the legal ground of this processing

We collect and process Personal Data in full compliance with the provisions of the Regulation as well as the national legislation.

In the paragraphs below (4.1 to 4.4) there is a more detailed analysis of the purposes and the legal ground of the processing.

4.1. For the performance of a contract (Article 6 (1)(b))

The processing of Personal Data is necessary in order for us to be able to take steps and enter into a contract and/or engagement contact and/or to fulfill your orders and/or to provide you with related services.

The purposes of the processing are adjusted according to the nature of the relationship.

4.2. For the purposes of the legitimate interests pursued by us or by a third party (Article 6 (1)(f))

Except for the above case, either we or third parties, process your Personal Data when necessary, except if your fundamental rights and freedoms override the below interests. Below are some examples:

- in court proceedings and/or to claim our legal claims.
- in the context of the operation and security of the IT sector of the company.
- in the context of preventing and clarifying criminal offenses.

It is noted that the CCTV system established outside our premises aims at providing a safe and secure environment for our employees and the smooth operation of our Company.

4.3. Due to your consent (Article 6 (1)(a))

If you give your consent on the processing of your Personal Data for specific purposes, such as for direct marketing purposes, the legal ground for the processing of your Personal Data is your express consent.

Please note that you may at any time withdraw your consent. The validity of this revocation will concern the future.

5. Transfer of your Personal Data outside the EEA or to an international organization

We do not transfer your Personal Data to third parties which are located outside the European Economic Area (EEA).

In any case, the processors in third countries are obliged to apply the Regulation in the same manner as the companies which are located within the European Economic Area.

6. How long we keep your information for?

We keep the information that we obtain about you during the recruitment process for no longer than necessary for the purposes for which it is processed. How long we keep your information for will depend on whether your application is successful and you are employed by us, the nature of the information concerned, the purposes for which it is processed or according to any relevant Directive of the Commissioner of Personal Data Protection.

We will keep recruitment information for no longer than six (6) months, after which it will be destroyed. If there is a clear business reason for keeping recruitment records for longer than six (6) months, we may do so but we will first inform you of this, the longer period for which they will be kept and get your consent.

If your application is successful, we will only keep the recruitment information that is necessary in relation to your employment.

Please note that the above period might be extended if for legal (such as on-going procedures) or technical reasons we cannot delete the above information.

7. Your rights

You have a number of significant rights, under the Regulation. Specifically:

- a) **right to access your personal data** (Article 15): meaning you might receive information and/or copy of the personal information we hold free of charge.
- b) **right to rectification** (Article 16): you might ask us to correct any mistakes in your information which we hold.
- c) **right to erasure (*right to be forgotten*)** (Article 17): you might ask us to erase the personal information concerning you.

However, we reserve the right to deny the erasure, if the processing is necessary for compliance with a legal obligation, for reasons of public interests or for the establishment, exercise or defense of legal claims.

- d) **right to restriction of processing** (Article 18): you might require us to restrict our processing of your personal data if you contest the accuracy of your personal data, the lawfulness of the processing, or you have objected to processing (according to article 21) and you wait for our reply whether we have legitimate grounds which override yours.
- e) **right to data portability** (Article 20): you have the right to request and receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to a third party under certain circumstances.

- f) **right to object** (Article 21): you have the right to object at any time to processing of Personal Data concerning you which is based on performance of a task carried out in the public interest or for the purposes of the legitimate interest pursued by us or third parties (article 6 (1) (e) and (f) of the Regulation).
- g) You also have the right to object under Article 22 at any time to processing of Personal Data concerning you for direct marketing or decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
- h) **right to withdraw your consent:** you reserve the right to withdraw your consent at any time. However, the withdrawal of the consent does not affect the lawfulness of the processing based on consent before its withdrawal.

If you wish to exercise any of the above rights or to ask any questions or clarifications or to complain, please do not hesitate to contact us at info@cmmi.blue.

Moreover, you also have the right to file a complaint at the Commissioner of Personal Data Protection. For more information concerning the process of filing a complaint, please visit the website www.dataprotection.gov.cy/) or via e-mail at commissioner@dataprotection.gov.cy .

8. How to complain?

We hope that we can resolve any query or concern you raise about our use of your information.

However, the Regulation also gives you right to lodge a complaint with the supervisory authority, the Commissioner of Personal Data Protection. For more information concerning the process of filing a complain please visit the website www.dataprotection.gov.cy/) or via e-mail at commissioner@dataprotection.gov.cy .

9. Are you obliged to provide us with your personal data?

You are required to provide your Personal Data to the extent that it is necessary to conclude, perform or terminate our agreement for services and/or recruitment and/or contract between us and to fulfill your mandates.

In case you refuse to give us your Personal Data, we will not be able to provide and/or continue to provide our services to you.

10. Keeping your personal data secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to have access to it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

11. Changes in this Privacy Notice

This Privacy Notice was published on 27/02/2020, and last updated on 26/01/2021.

We may change this privacy notice from time to time and in such case we will inform you via email.

We also ask you to periodically visit our website for any updates of this privacy notice.

Please contact us, if you have any questions about this privacy notice or the information we hold about you at info@cmmi.blue .