

Privacy Notice

November 2018

Introduction

This privacy notice provides an overview of how JCC Payment Systems Ltd ('JCC') processes personal data of persons who submit an application for a job with JCC ("applicants") in the context of the review of their application.

The "personal data" relates to a living individual who can be identified from such data such as for instance, name, address and/or identification number, etc. It does not include data where the identity has been removed (anonymous data).

For the purposes of this Privacy Statement "personal Data" refers to any information about an applicant that JCC collects from the applicant him/herself or from other sources.

Application and Recruitment process

Processing of personal data

The personal data of applicants is collected and held by JCC, which is responsible for their processing. If you, as an applicant, wish to contact JCC in relation to the processing of your personal data you may do so by contacting the Data Protection Officer of JCC at 'dpo@jcc.com.cy'.

In all cases, the processing of your personal data by JCC must be in compliance with the provisions of the applicable personal data protection law (including the EU General Data Protection Regulation or "GDPR", applicable as of 25 May 2018). The rights provided to you by the GDPR in relation to the processing of your personal data by JCC are described in this notice.

The applicant acknowledges and consents with the process as described below. In other case the applicant can opt-out and the process will cease.

How JCC uses applicant's personal data

The law allows JCC to use personal data only if JCC has a proper reason to do so. Reasons may be but not limited:

- To take any steps, at the request of the individual concerned, before he/she enters into a contract with JCC.
- When it is JCC's legal obligation, pursuant to applicable laws and regulations (such as law relating to employment and social insurance matters, AML Law/Directive).
- When it is in the legitimate interests* of JCC or another person with whom the data are shared, provided these interests do not unfairly go against what is right and best for the individual concerned.

- When the individual provides his/her consent to the use of his/her personal data.

Why and when we use the personal data of the applicant

The data requested in the job application are necessary for the assessment of the applicant by JCC for the relevant position. Depending on the particular position, the data may include confirmation that the applicant has the qualifications and/or experience required by JCC and any law or regulations applicable to JCC. As a rule, JCC would not be able to properly assess the application and enter into any employment relationship without these data and the applicant consents for the submission of the personal data.

When requesting the provision of any additional data from applicants, JCC will inform them whether they are required to provide these data and of any consequences if they do not.

Specifically, the personal data are needed for reasons, not limited, to the below:

- To review the application and assess the applicant's suitability.
- To verify and, if required, obtain confirmation of the applicant's qualifications and prior work experience.
- To communicate with the applicant.
- To obtain, if required, regulatory consent to the applicant's recruitment.
- For Pre-contractual steps.
- For Company legitimate interests* such as complying with applicable law and regulations, being efficient in fulfilling the company's legal duties and reviewing applications, for record keeping.
- For JCC's legal obligation if any.
- For being efficient in fulfilling JCC's recruitment procedures
- To consider the possibility of recruiting the applicant in case of future vacancies (if the applicant is not recruited during the current recruitment process).
- To establish, exercise or defend any legal claims.
- To detect, investigate, report and help to prevent and prosecute crime (such as cooperating with the police and other authorities in Cyprus and the EU).
- To comply with laws and regulations that apply to JCC and its business.
- To respond to requests for information from regulatory and other authorities' rights under applicable laws and regulations.

Sources and types of personal data

JCC collects personal data from the applicants themselves through their job application form found on JCC's website and during any interviews that take place during the recruitment process. Data is also collected from the persons who provide references for the applicants.

JCC collects different types of personal data in relation to applicants:

- Identification data (name and identity card and/or passport number)
- Contact details (residential address, telephone number and email address)

- Qualifications (education, academic and professional qualifications, relevant certificates and licenses)
- Work experience (previous positions and experience)
- Criminal records
- Health Data

Special categories of personal data

The law treats some types of personal data as special. These include data relating to criminal convictions and offences and Health Data. JCC collects data relating to criminal convictions and offences (e.g. clean criminal record certificates) as required by International Card Schemes regulations and standards (PCI-DSS, ISO27001) and legislation. Health Data are collected as part of obligation of JCC for the safety of co-employees and customers of JCC.

The applicant consents for the submission of police criminal records and Health Data.

Who has access to applicant's personal data

Access to applicant's personal data within JCC is given to those employees who are involved not only in the recruitment process but subsequently to human resources activities such as employee assessment, payroll, employee trainings and development etc.

Access to personal data may also be given to third party service providers and agents engaged by JCC for business purposes. Such service providers and agents are required to observe JCC's instructions in relation to the processing of personal data.

These third parties are mainly agents and advisers that JCC uses to help with or run the recruitment process, to organisations that process data on behalf of JCC, including support / maintenance of Electronic Data Processing / Information Technology applications, archiving and file storage, document processing, data destruction, compliance services, auditing services or to external legal advisors.

JCC may disclose personal data to governmental, regulatory and other authorities and public bodies in Cyprus and the European Union to the extent required by law, regulation, directive or court order such as:

- Governmental departments and ministries (such as the Department of Social Insurance)
- The Human Resource Development Authority
- The Central Bank of Cyprus, the European Central Bank, the European Banking Authority, the Single Supervisory Mechanism
- Other regulators, authorities and public bodies insofar as a statutory or other obligation exists

Sending personal data outside of the European Economic Area (the "EEA")

JCC will only send applicant personal data to a country outside the EEA (a "third country"):

- If this is prescribed by law (for example, any reporting obligations under tax law);

- If the applicant has consented; or
- In the context of data processing undertaken by third parties on behalf of JCC and according to JCC's instructions.

If JCC does transfer personal data to a third country, JCC will make sure that the relevant personal data are protected in the same way as if they were being used in the EEA. JCC will use one of these safeguards:

- Transfer the data to a third country with privacy laws with similar data protection as the EEA, as certified by an adequacy decision of the European Commission (please refer to the European Commission website).
- Put in place a contract with the recipient adhering to the same standards as applicable in the EEA (please refer to the European Commission website).
- Transfer it to organisations in the USA that are part of Privacy Shield, a framework that sets privacy standards for data sent between the USA and EEA countries (please refer to the European Commission website).
- Transfer it to organizations that comply with binding corporate rules or an approved code of conduct or certification mechanism that require its protection to the same standards as applicable in the EEA.

How long JCC keeps applicant personal data

The personal data of applicants who enter into an employment contract with JCC will be retained by JCC in its employee records as described in JCC's Privacy Statement for employees, which is provided to such successful applicants before they enter into the employment contract with JCC.

Submission of an application of general interest

An application of general interest and related personal data will be maintained by JCC for a period of one (1) year following submission of such application. If an applicant wishes to be considered for employment with JCC after this period, the applicant will have to submit a new application and related personal data.

Submission of an application for a specific job position

An application for a specific job position as published by JCC from time to time and related personal data will be maintained by JCC, for the purpose and/or in the context of the procedure for filling such specific job position, for a period of twelve months following submission of the application for such specific job position. If an applicant wishes to be considered for any future job vacancy after this period, the applicant will have to submit a new application and related personal data after a period of one year.

Data protection rights under the GDPR and how to exercise them

The data protection rights granted by the GDPR are described below. You may exercise them at any time by contacting JCC's Data protection officer (dpo@jcc.com.cy):

➤ ***Obtaining a copy of your personal data***

You have the right to obtain from JCC confirmation as to whether or not your personal data are held and processed by JCC and to access your data.

➤ ***Correction of inaccurate or incorrect information***

If you think that JCC has information about you which is wrong or incomplete or out of date, you have the right to bring this to the attention of JCC. If you do, JCC will take reasonable steps to correct and update the data (subject, where appropriate, to verification of the accuracy of the relevant data).

➤ ***Withdrawing your consent***

If you have consented to the retention of your data by JCC after the completion of the current recruitment process, you have the right to withdraw your consent at any time. If you withdraw your consent, JCC will delete your personal data and will not consider you in case of future vacancies during the retention period unless you submit a new application.

➤ ***Objecting to JCC's use of your personal data***

You have the right to object, on grounds relating to your particular situation, to processing of your personal data which is intended by JCC to safeguard its legitimate interests*. If you lodge an objection, JCC will no longer process your personal data unless JCC can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or unless the processing is for the establishment, exercise or defense of legal claims.

➤ ***Right to be forgotten***

You have the right to request from JCC to delete or remove your personal data in the following circumstances:

- The processing of the data by JCC is no longer necessary for any of the reasons the data were collected and used (e.g. because you decide to withdraw your application)
- You have withdrawn your consent to the retention of your data by JCC and there is no other reason for the processing of these data
- You have successfully objected to the processing of the data by JCC.
- The data have been unlawfully processed
- Deletion is required by law

There may be legal or other official reasons why JCC needs to keep your personal data. Kindly inform JCC if you believe your data should be deleted.

➤ ***Restriction of processing***

You also have the right to restrict JCC from using your personal data. This enables you to ask JCC to suspend the processing of personal information about you, for example if you want to establish its accuracy or the reason for processing it.

➤ ***Data portability***

You have the right to receive your personal data from JCC in a format that can be easily re-used. You can also ask JCC to pass on your personal data in this format to other organisations, where this is technically feasible. This right relates to the data which you have provided to JCC and which JCC processes electronically in reliance on your consent.

➤ ***Filing a complaint***

If you are unhappy with how JCC has used, or uses, your personal data, please let JCC know. You also have the right to complain to the Office of the Commissioner for Personal Data Protection (www.dataprotection.gov.cy)

Changes to this Privacy Notice

JCC may revise or update this privacy notice from time to time. The new version of this notice will be available on JCC's website. In case of significant changes (such as in relation to the reasons for which JCC uses personal data or to the way in which you may exercise the rights described above) during the recruitment process or the period of retention of your data, JCC will bring these changes to your attention.

Note*: A legitimate interest is when JCC has a business and/or commercial reason to use applicant personal data. Other persons outside JCC may also have a legitimate interest to receive certain applicant personal data for their regulatory purposes (for example, where regulatory consent is required for the applicants to be recruited in a particular position).