

Candidates Privacy Policy

1. General Information

1.1. In our company the protection of your personal data is our priority. The société anonyme under the name “**ATTIKOS HELIOS HOTEL - TOURISM - COMMERCIAL AND SHIPPING SOCIETE ANONYME**” and the distinctive title “**ATTIKOS HELIOS A.E.**” (hereinafter as the “**Company**”) seated in Athens, 19 Amerikis street, P.C. 10672 with V.A.T. 094542870 and GEMI registration number 003190901000 is the Controller of your personal data that we process during the process of your application as a candidate until we hire you (hereinafter “**Personal Data**”) has conducted this Candidates Privacy Policy (hereinafter the “**Privacy Policy**” or “**Policy**”) in order to inform you regarding the way we collect your Personal Data in the said context and in compliance with the General Data Protection Regulation 2016/679 (GDPR), the Greek Law 4624/2019 and the guidelines and decisions of the competent bodies (hereinafter the “Applicable Data Protection Legislation”).

1.2. For any concerns, questions or complaints regarding the processing of your Personal Data or this Policy, you may contact our Company as follows:

- By phone at +302103679000
- By mail at dpo@grandresort.gr
- By sending a letter at 19 Amerikis St., P.C. 10672

2. Who is subject to this Candidate Policy?

This Candidate Policy is intended to inform you, the candidate Employees of our Company, who express your interest in working with us (hereinafter “**you**” or the “**Candidates**”) who may belong to one of the following categories and follow the respective procedure for expressing your interest in working for our Company:

- (i) Candidates who **sent your resume on your own initiative, without an active job posting** or following a referral from another employee of our Company,
- ii) Candidates who **have submitted your resume** to meet the needs of a specific job position for which there is an active job position call by our Company; or
- iii) Candidates who **complete the Employment Application**.

3. What Personal Data do we process in the procedure of investigating our cooperation?

3.1. Personal Data is the information that is associated with you as a natural person and Candidate and which may identify you directly or indirectly in combination with other information.

3.2. Personal Data collected and processed by our Company are the following:

A. Mandatory

- i) Identification Data (name, gender, date, nationality)
- ii) Contact Data (postal and e-mail address, mobile phone number)
- iii) Education data, professional experience, data related to your past duties and responsibilities at work.
- iv) Identity data
- v) Curriculum Vitae (where applicable).

B. Optional

- Data from a letter of reference or from former employers
- Additional data that you voluntarily fill in on your CV or Application for Recruitment

C. Suitability data

Following the first assessment of your qualifications, in compliance with the obligations of the legislation applicable to the hotel business, we collect and process the copy of your criminal record and the medical certificate that you provide us with.

D. Evaluation data (interview, assessment tests for senior management positions), reason for rejecting a recruitment application.

3.3 Your Personal Data are collected and processed by the specially authorized team of our Company, which occupies with human resources and recruitment management, as well as by any supervisor belonging to the department you are going to work in.

4. Purpose and lawful reason for processing Candidates data

4.1. Our Company as a Data Controller processes your Personal Data based on a lawful reason (legal basis).

4.2. Our Company collects and processes your mandatory Personal Data and your assessment data to the extent required during the interview and recruitment investigation process in order to assess whether you meet the conditions of your employment for a specific position and to contact you about it. The processing of your Personal Data in the aforementioned context is necessary for our **legitimate interest** in seeking to recruit qualified and suitable staff for the purposes of our business,

4.3. We collect your Suitability Data (criminal record and medical certificate) from you and process them, following your successful assessment as a candidate, as necessary in accordance with the applicable legislation for the recruitment of hotel employees in the context of our Company's **compliance with its legal obligation**.

4.4. We collect your Optional Data on the basis of your **consent** to provide us on your own initiative with additional information beyond the required information that we request from you.

4.5. In the event that you are not immediately hired and you wish us to retain your data for possible future employment opportunities with our Company and to contact you to inform you of the possibility of being hired in the next season, you must provide us with your **consent** for this purpose.

4.6. When managing a personal data breach incident, our Company processes your Personal Data for: a) investigating a data breach incident, b) informing you (if necessary), c) recording the incident in the relevant Breach Documentation File as part of its **compliance with its legal obligation** under the GDPR.

Notes:

- Where the legal basis for processing is consent, the withdrawal of consent is valid for the future, while the processing of Personal Data up to that point is lawful.

- As Data Controllers, we have the obligation to keep your Personal Data accurate and up to date in our records. As part of this, there is a possibility that we may contact you from time to time. In any case, you have the obligation to inform us of your data that we need to update and/or to ask us to delete or correct data that is not accurate or true.

- Our Company relies on its overriding legitimate interest in the event that it needs to process your Personal Data in order to exercise or defend its legal rights.

- Where the legal basis for processing is the legitimate interest of our Company, we carry out a fair balancing of this with your privacy. In any case where you consider that your rights are infringed you have the right to exercise your right to object.

5. Recipients

Recipients of your data may also be external partners and companies affiliated with ours such as:

A. Information system and/or application providers, consultants, cloud storage companies and technology service providers.

B. Judicial, police, prosecutorial or other authorities in accordance with applicable law and pursuant to a legal mandate. In the event of a legal order, official order or official preliminary investigation, our Company has the right to make the relevant data available to the respective agency without any further notice.

C. Law firms or lawyers working with our Company, bailiffs.

D. Companies that are Members of our Group of Companies.

6. Transfers outside the EU

Our Company takes appropriate measures to ensure that all processing of your Personal Data takes place within the EU or EEA or in a country that has an adequacy decision adopted by the EC. In the event that it is necessary to transfer your data to a third country without an adequacy decision, then it takes all appropriate safeguards and measures to protect your data during transfers such as conducting a Transfer Impact Assessment (TIA), concluding SCCs, taking appropriate additional contractual, technical and organisational measures.

7. How long we keep your Personal Data

7.1. In the event that our investigation process leads to your employment, your Personal Data will be kept in accordance with the Employee Privacy Policy, which is communicated to all Employees of our Company.

7.2. In the event that you do not enter into an employment contract with the Company, your Personal Data will be kept in our Company's records for 6-8 months from the date the job is filled.

7.3. In case you are not employed, your Personal Data will be deleted/destroyed after the above period, based on the Company's destruction policy.

7.4. Please note that copies of Criminal Record or Medical Certificate, will not be kept in our records at all, if you are not hired.

8. Security of Personal Data

Our Company implements appropriate technical and organizational measures and strict security procedures (such as firewalls, antivirus, etc.) to protect your Personal Data and information collected from unauthorized disclosure, use, alteration or destruction. In the event of force majeure or fortuitous events as well as reasons due to technical or other network failures or circumstances beyond the security measures taken or beyond the Company's control, the security of Personal Data in the digital environment is subject to reasons beyond our Company's sphere of influence.

9. What are your rights and how to exercise them in relation to the protection of personal data?

9.1 You have the right of access, rectification, erasure, restriction of processing, portability, objection, the right not to be subject to automated decision-making, including profiling (Note that our Company does not make decisions based solely on automated processing of your Personal Data), withdrawal of consent, complaint to the competent authority (In Greece, the competent authority for data protection is the Hellenic Data Protection Authority (www.dpa.gr)), which you can exercise in accordance with the Applicable Data Protection Legislation and with the procedure set by our Company in the following paragraph.

It is noted that these rights can be exercised as long as your data are still retained by our Company on the basis of the aforementioned retention periods.

9.2 Procedure for exercising your rights:

Our Company has adopted the following procedure for exercising your rights:

Sending a request: You can send your request to our Company's contact details, as they appear in section 1.2. above.

Identification: We aim to maintain a high level of confidentiality of all records held by our Company that contain Personal Data, therefore we reserve the right to ask you for certain information to prove your identity if you submit a request to exercise your rights in relation to those records.

Specific requests: Your request must include specific and true information and/or facts in order for us to respond and/or fulfill it accurately. Otherwise, our Company reserves the right to deny requests that are unfounded, excessive, abusive or unlawful.

Schedules: We will respond to your valid and accurate requests within one (1) month of receipt, unless they are particularly complex or a series of requests have been submitted together. If we need more time to respond to your request, we will notify you in this regard within the month but will in any event respond to you within three (3) months of sending your request.

Cost: We will not charge you any costs for exercising your rights in relation to your Personal Data unless, as provided by law, your request for access to information is unfounded or excessive, in which case we are entitled to charge a reasonable fee according to the circumstances. In any event, we will inform you of any charges before we complete your request.

10. Amendments to this Policy

10.1. This Policy shall take effect from the date of its issuance. Our Company reserves the right to amend this Candidate Policy and to notify you of any substantial change in the processing of your Personal Data and/or in its practices regarding the collection and processing thereof, in accordance with applicable law and pursuant to any amendments thereto.

10.2 In the event that any of you would like any clarification or information regarding the changes, or have any disagreement, reservation or query in relation to them (changes), you may contact our Company at its contact details as set out above. Please note that any information/clarification provided in accordance with the above, regarding the possible changes to this Policy, does not constitute a replacement, substitution or any amendment to this Policy.

Date 14/02/2024