**VIK ZYSK Recruitment Privacy Policy**

**PURPOSE OF THIS PRIVACY NOTICE**

This policy governs the use by VIK ZYSK (‘VIK ZYSK’, ‘us’ or ‘we’) of any data you share with us whether by submitting a CV to us or otherwise engaging with our services. At VIK ZYSK it is of paramount importance to us that your information is safeguarded and secure. This privacy notice will inform you as to how we use your personal data and tell you about your privacy rights and how the law protects you.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

**CONTROLLER**

VIK ZYSK OOD, a company duly registered in Bulgaria under UIC 203864621, having its seat and registered address at 31 Bratsigovo Str., floor 1, apartment 1, Dobrich, Bulgaria and having its main quarters at General Kolev Str., Varna, 9000, Bulgaria, is the controller responsible for your personal data. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact Mrs. Ilina Miteva using the details set out below.

Name: Ilina Miteva

Address: 54 General Kolev Str., Varna, 9000, Bulgaria

Email: ilina@vikzysk.com

You have the right to make a complaint at any time to the Commission of Personal Data Protection (<https://www.cpdp.bg>) being the supervisory authority for data protection issues.  We would, however, appreciate the chance to deal with your concerns before you approach the Commission of Personal Data Protection so please email us at ilina@vikzysk.com in the first instance

**CHANGES TO THE PRIVACY NOTICE**

This version was last updated on 16.12.2018

**YOUR DUTY TO INFORM US FOR CHANGES IN YOUR PERSONAL DATA**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**THE DATA WE COLLECT ABOUT YOU**

**Personal Data**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**Identity Data** includes first name, last name, title, date of birth

**Contact Data** includes address, email address and telephone numbers.

**Financial Data** includes bank account, salary information, including salary expectations.

**Curriculum Vitae Data** includes employment history, education history and training history.

**Recruitment Data** includes details about positions for which you have been put forward, interviews attended, interviews feedback, preliminary tests, etc.

**Communications Data** includes your preferences in receiving messages from us and our third parties and your communication preferences.

**Special Categories**

”Special categories” of particularly sensitive personal information require higher levels of protection (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

We do not ordinarily request or require medical or health information or other special categories of personal information. You are not obliged to provide this information but if we are not made aware of any relevant medical or health issues we will be unable to take appropriate measures to ensure your safety and comfort.

**Criminal convictions**

When applying for certain position it may be required by the applicable legislation to collect information about criminal convictions and offences to comply with our legal obligations. We do not ordinarily request or require such information, but if it becomes necessary we will provide you with further information in that regard.

**Further information**

We may provide you with further specific information about the type of data and purpose of it at the point of data capture.

**HOW YOUR DATA IS COLLECTED**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact and Curriculum Vitae Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

* apply directly to us;
* apply for jobs advertised by us via third parties;
* give us some feedback.

**Third parties or publicly available sources**.

Part of our business activity involves researching information relating to individuals for the purposes of filling job roles. This may include obtaining personal data from online sources, for example we may obtain information from social media sites such as LinkedIn, some information being publicly available but others being from websites or providers to which we subscribe. From time to time we may also receive personal information about you from hiring organisations, colleagues and former employers, or from persons for whom you have provided services or been otherwise engaged. Below is a unexausted list of various third parties:

* Social Media, including without limitation, LinkedIn or other public forums;
* A client
* Online jobsites
* Former employers in the context of reference checking;
* Potential employers in the context of interview feedback;
* Conversations, with you or others, on the telephone or video conferencing (which may be recorded) or in meetings
* Notes following a conversation, with you or others, or meetings you attend
* The public domain

Where information from third party sources is of no use to us, or where you have notified us that you do not want us to provide you with services, we shall discard it, however we may maintain a limited record in order to avoid the duplication of process.

**LEGAL GROUNDS FOR PROSSESING YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

**Your consent**. If consent is used as a legal basis for processing your data, you have the right to withdraw consent at any time by sending an email to ilina@vikzysk.com.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Legitimate Interest** means conducting and managing our business in a way that enables us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by the law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing us at **ilina@vikzysk.com**

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to. Foe example, we are required to comply with statutory and regulatory obligations relating to business generally, such as complying with tax, bribery, fraud/crime prevention and data protection legislation, and co-operating with regulatory authorities

**PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of the ways we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please email us at **ilina@vikzysk.com**if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.The lawful basis of processing that we use are as follows:

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To process your application for an advertised position | IdentityContactCurriculum Vitae | Consent where you apply directly to a job advertisement posted by us or on our behalfLegitimate Interest where we obtain your data from a 3rd party pending our obtaining your Consent to be considered for a position. |
| To keep your data on file for ongoing candidate placement services and:(a) Notifying you of potential roles or opportunities(b) Introducing and/or supplying you to actual or potential clients | IdentityContactCurriculum VitaeRecruitmentFinancialCommunications | Consent |
| To manage our relationship with you which will include:(a) Notifying you about changes to our terms or privacy policy(b) Asking you to leave a review or take a survey | IdentityContactCommunications | (a) Performance of a contract with you(b) Necessary to comply with a legal obligation(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To make suggestions and recommendations to you about goods or services that may be of interest to you: | IdentityContactCommunications | Consent |
| Providing information to regulatory authorities or statutory bodies | IdentityContactRecruitmentFinancial | Comply with a legal or regulatory obligation |

**Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us at **ilina@vikzysk.com****.**If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with external third parties set out below for the purposes set out in the table above:

* Service providers based inside and outside of EEA who provide IT and system administration services.
* Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in Bulgaria who provide consultancy, payroll, banking, legal, insurance and accounting services.
* Revenue, governmental agencies, regulators, grant authorities and other authorities acting as processors or joint controllers based in Ireland who require reporting of processing activities in certain circumstances or to whom we are obliged to share information about our organisation and participation in it.
* Clients, hires and subcontractors acting as processors or joint controllers.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**INTERNATIONAL TRANSFERS**

In order to provide certain services to you, we may need to transfer personal information to locations outside the jurisdiction in which you are. This may, for example, be to clients or third parties who provide support services to us. Please note that such transfers and processing of personal data may be in locations outside the the European Economic Area (the “EEA”). Where information is to be so transferred, it may be to a country in respect of which there is an adequacy decision issued by the European Commission. However, if this is not the case, it is our policy to take steps to identify risks and in so far as is reasonably practicable, ensure that appropriate safeguards are in place

**DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by emailing us at ilina@vikzysk.com.

**YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

**You may;**

**Request access to your personal data.** This is commonly known as a “data subject access request”. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it**.**

**Request correction of your personal data**.This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure of your personal data.**This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing of your personal data.**You may object where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights.

**Request restriction of processing your personal data**.This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request transfer of your personal data to a third party.**We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Right to withdraw consent.**Where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please email us at **ilina@vikzysk.com**