

## **CANDIDATE PRIVACY NOTICE**

### **REGARDING THE PROCESSING OF PERSONAL DATA**

Through this Privacy Notice, the company under the name "BRIGHTaddvalue G.P.", having its registered office at 21 Voukourestiou Street, Athens, (hereinafter referred to as the "Company"), aims to inform job applicants about the processing of their personal data in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR), Law 4624/2019, the Decisions, Guidelines and Opinions of the Hellenic Data Protection Authority, and the applicable legislation and case law of Greece and the European Union regarding the protection of personal data (hereinafter referred to as the "Applicable Legislation").

This Privacy Notice concerns and applies to the personal data of candidates submitted, either electronically or in hard copy, through résumés/CVs during the recruitment and personnel selection process for employment with the Company.

#### **1. DEFINITIONS**

**"Data Controller"**: The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; in this case, the Company.

**"Processing"**: Any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as 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, whether such data are in electronic or hard-copy form.

**"Personal Data"**: Any information relating to an identified or identifiable natural person, whose identity can be determined directly or indirectly, particularly by reference to an identifier such as a name, identification number, or to one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural, or social identity of that person.

**"Special categories of Personal Data"**: Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data processed for the purpose of uniquely identifying a person, data concerning health, or data concerning a natural person's sex life or sexual orientation. Data relating to criminal convictions, offences, prosecutions, and related security measures are also treated as a special category of data.

#### **2. PROCESSING OF PERSONAL DATA**

In view of potential future cooperation, the Company collects personal data from job applicants, including:

- Identification and contact details (full name, email address, telephone number, address).
- Information contained in the applicant's CV/résumé.
- Professional experience, education, skills, and certifications.
- Information provided by the applicant during interviews or assessments.
- References or referral information disclosed by the applicant.
- Publicly available professional information (e.g., professional profiles such as LinkedIn), wherever necessary for evaluating the application.

The Company does not seek to collect sensitive personal data during the candidate evaluation process.

### **3. PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA**

The purposes for processing applicants' personal data are:

- Evaluating each applicant's suitability for employment.
- Communicating with applicants regarding the recruitment process.
- Conducting interviews and assessments.
- Verifying qualifications and professional experience wherever required.
- Managing and documenting the recruitment process.
- Considering applications for future job opportunities, where the applicant has provided consent or wherever permitted under applicable law.

The legal basis for processing applicants' personal data is the Company's legitimate interest in recruiting the most suitable candidate for each position.

### **4. SECURITY OF PERSONAL DATA**

Taking into account the state of the art, implementation costs, and the nature, scope, context, and purposes of processing, as well as the varying likelihood and severity of risks to the rights and freedoms of applicants, the Company implements appropriate technical and organizational measures to ensure an appropriate level of security, integrity, and confidentiality of personal data, in accordance with the GDPR and Applicable Legislation.

For this purpose, the Company has adopted procedures for the protection of personal data and implemented significant information security measures, including secure storage and operating environments, tiered access controls, and other appropriate safeguards.

### **5. STORAGE AND RETENTION OF PERSONAL DATA**

The personal data collected by the Company is stored at the Company's headquarters, and appropriate technical and organizational measures are taken to ensure their security, integrity, and controlled access.

If the Company does not proceed with hiring an applicant, the applicant's personal data will be retained for a period of twelve (12) months following completion of the recruitment process, unless a longer retention period is required by applicable law or the applicant has consented to the retention of their data for future employment opportunities. Where an applicant submits their details through the Company's Expression of Interest form, without applying for a specific vacancy, their personal data will be retained for twelve (12) months from the date of submission. If the applicant is hired, the relevant data may be incorporated into the employee's personnel file.

### **6. APPLICANTS' RIGHTS**

In accordance with the GDPR and the Applicable Legislation, applicants have the right to exercise:

- The right to access information about the personal data processed by the Company and to obtain a copy thereof.
- The right to rectification and/or completion of inaccurate or incomplete personal data.
- The right to ask for their data to be erased where the Company no longer has a lawful basis for processing.
- The right to restriction of processing where one of the conditions set out in Article 18 GDPR applies.
- The right to data portability, meaning the right to receive their personal data in a structured, commonly used, and machine-readable format, or to have those data transmitted to another party.

- The right to object to the processing of their personal data, including objection to automated decision-making and profiling.
- The right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

In case of exercising one or more of the above-mentioned rights, the Company will endeavor to respond without undue delay and, in any case, no later than one (1) month from the submission of the request and the identification of the candidate. This deadline can be extended by two (2) more months, if necessary, if the request is complex or there is a large number of requests.

## **7. COMPLAINTS**

If applicants believe that their personal data are being processed in violation of the Applicable Legislation, they have the right to lodge a complaint with the Hellenic Data Protection Authority.

## **8. COMMUNICATION**

If an applicant has any questions or concerns regarding the way the Company processes their personal data or wishes to exercise any of the rights referred to in Section 6 of this Notice, they may contact the Company by email at: [info@braddvalue.gr](mailto:info@braddvalue.gr) or the Human Resources Officer at: [hr@braddvalue.gr](mailto:hr@braddvalue.gr)

## **9. GOVERNING LAW**

Any dispute between the applicant and the Company arising out of or relating to this Privacy Notice shall be governed by and interpreted in accordance with the laws of Greece. The courts of Athens, Greece, shall have exclusive jurisdiction over any dispute arising in connection with this Privacy Notice.

Should any provision of this Privacy Notice be held by a competent court to be unlawful, invalid, or unenforceable, such invalidity or unenforceability shall not affect the validity and enforceability of the remaining provisions, which shall remain in full force and effect.

## **10. UPDATES TO THIS PRIVACY NOTICE**

The Company may amend this Privacy Notice from time to time. The most recent version will always be available through the Company's website.

**Last Updated: June 2026**