

# Applicant Privacy Notice

## Introduction

This notice relates to your personal information. It sets out what information we collect about you, why we collect it, what we use it for and the rights you have in relation to that information.

By “**we**”, we mean South Stream Transport B.V. and/or its branches, the company where you are applying for job opportunities, internship or a contractor position.

By “**you**”, we mean the individual who applied for a vacancy or who attend a recruitment event at South Stream Transport B.V. and/or its branches.

By engaging in our recruitment process (where legally required), you expressly consent to our collection, use, storage and disclosure of your personal data, including any sensitive information you elect to submit (as described in this Privacy Notice).

This notice sets out how your information is used during and after the recruitment and selection processes in the Netherlands. If you are applying in another jurisdiction, please refer to the guidance of such jurisdiction.

## Collecting your information

The information we process about you has been, or will be, collected directly from you in order to carry out the purposes stated below. We may also collect information about you through external companies that we have engaged for the purpose of recruitment, such as head hunting companies or online platforms specialised in recruitment.

We will also collect data from other individuals, companies or institutions when we check your references or carry out any background checks in relation to you. If we do carry out any such checks, we will inform you during the recruitment and selection process of the exact checks that are going to be carried out and ask for your consent where required.

## How we use your information

We will use your information for the purposes set out below.

*A potential contract:* We may use your information for the purpose of entering into a potential contract with you. This means we will use your information to:

- Make decisions about your recruitment and selection, including possibly entering into a contract with you.
- Assess your qualifications for a particular job or task.
- Execute and manage the recruitment and selection process, including planning HR related activities.
- Confirm you are entitled to work in a jurisdiction and whether you fall within the scope of the Occupational Disability (Employment Targets and Quotas) Act (*Wet banenafpraak en quotum arbeidsbeperkten*) or whether you are eligible for any subsidies.
- Reimburse you for any expenses that we have agreed to meet upfront.

- We ask you not to provide us with any sensitive personal data regarding your health, other than strictly required for the recruitment and selection process. If you provide such information, we will use it for the purposes of providing you with a safe working environment and/or to consider and make any appropriate adjustments to our recruitment and selection processes where necessary.

To comply with the law: We will use your information where necessary to comply with the legal obligations placed upon us. This means we will use your information to:

- Keep records necessary to demonstrate our compliance with our compliance obligations; for example in relation to bribery.
- Disclose your information where we are under a legal obligation to do so.

To manage and protect the legitimate interests of our business: We will use your information where we have a legitimate interest in managing and protecting our business (including preventing or detecting crime and fraud), and have taken measures to ensure that this does not cause unwarranted prejudice to your privacy. This means we will:

- Use your information to generate management information and business analytics. In many cases, this will result in your information being aggregated and anonymised.
- Use your information where it is relevant to legal claims or disputes brought by you or another person, including any accidents at our locations.

### **What information do we hold about you?**

We hold the following information about you in order to carry out the activities set out above:

- Basic biographical and personal details: This means your name, age, gender, date of birth, nationality, photograph, home address, personal telephone number, personal email address and marital status.
- Recruitment information: education, diplomas and certificates, knowledge of languages and any further recruitment information, such as salary levels and other similar information.
- Historical work information: This includes your former job title, location, start date, leave date, reason for leaving and performance.
- Information regarding your right to work in the jurisdiction in which you have applied.
- Information collected through publicly available sources, such as websites and online platforms, social media, media, insofar relevant for the role you are applying for.
- Private information: As set out in the paragraph above.

### **How long do we keep this information?**

We will keep this information during the time of the recruitment and selection process you participate in and, in principle, for four weeks thereafter. If you give us permission thereto, we will keep your information for a maximum of one year after the recruitment and selection process has been finalised. We can then use your information, for example to contact you regarding new vacancies, recruitment information and events. If your application is successful, different retention periods apply in accordance with our Employee Privacy Notice.

## To whom do we disclose your information?

We will disclose your information in the circumstances set out below.

To third party service providers: We might disclose your information to third parties who provide us with services related to your upcoming employment with us; such as our relocation service provider, lawyers or accountants. Where we disclose information to our service providers we impose strict controls to ensure that it continues to be properly protected.

In accordance with the law: We might disclose your information where we are under a legal obligation to do so; for example because a law obliges us to disclose that information or we have to disclose it as part of a legal claim. We will also disclose your information where there is substantial public interest, and the disclosure is necessary and proportionate.

With your consent and in other situations: We might also disclose your information in other situations, such as where you have asked us to or where there is a legitimate reason do so. In such case, we will seek to anonymise your information where reasonably practicable.

## Your rights

You have a number of rights in relation to your information. Where you contact us to exercise your rights, we will not normally charge any fee and will normally comply with that request within a month (though in some cases, we may take an additional two months). We are not obliged to respond if your request is clearly unfounded or excessive.

Access your information: If you want access to the information, we hold about you, please use the contact details below.

Correct your information: Please make sure that the information we hold about you remains up to date. If you want to correct information, please use the contact details below.

Data portability: If you would want us to transfer the personal data we hold about you, please use the contact details below.

Concerned about our use of your information: You can, in certain circumstances, ask us to stop using your information or to delete your information. We note that this may result in us no longer being able to process your application. In some cases, we may need to continue to hold and use your information, even if you ask us not to; for example, where we are under a legal obligation to retain that information. However, if we are not able to comply with your request, we will tell you why.

## Contact us

If you would like any more information, or would like to exercise any of the rights set out above, please contact us at: [privacy@turkstream.info](mailto:privacy@turkstream.info)

You also have the right to lodge a complaint with the data protection regulator in the jurisdiction in which you live or work. The data protection regulator for the Netherlands is the *Autoriteit Persoonsgegevens*. They can be contacted at <https://autoriteitpersoonsgegevens.nl>.

This privacy notice may change from time to time. We will take reasonable steps to notify you if any of the changes are significant.