

# Candidate Employees Privacy Notice

## 1. Introduction

“INTERNATIONAL AIRPORT OF HERAKLION, CRETE S.A.” (hereinafter the “Company”, “We”, or “Us”) is committed to protecting and respecting your privacy. This Privacy Notice is provided in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and the applicable Greek data protection legislation, including Law 4624/2019. It explains how we collect, use, store, and protect the personal data of job applicants when submitting their CVs and applications through Workable.

## 2. Data Controller

For the purposes of the General Data Protection Regulation (“GDPR”), the Data Controller is the company “INTERNATIONAL AIRPORT OF HERAKLION, CRETE S.A.”, having its registered seat Ikarou Avenue 26, PC 71307, Heraklion Crete, email: [contactus@iahc.gr](mailto:contactus@iahc.gr).

## 3. Data Processor

For the management of the recruitment process, we use an electronic application provided by Workable Software Limited, which acts as our Data Processor. This platform processes job applicants’ data on our behalf and strictly in accordance with our instructions, solely for the purpose of supporting recruitment activities (such as the collection of applications, the storage of relevant information for a reasonable period of time, and the facilitation of communication during the hiring process).

The Data Processor is bound by a Data Processing Agreement, as required under Article 28 of the GDPR, which ensures that your personal data are handled securely, lawfully and in full compliance with applicable data protection regulations. We remain the Data Controller for all applicant data, while the Data Processor does not use your data for any purpose other than the services we have instructed them to provide.

## 4. Categories of Personal Data

In the context of the recruitment process for job applicants, we collect and process the following categories of personal data, which are strictly necessary, relevant, and proportionate for achieving our purposes:

- **Identification data:** e.g. first name, last name, date of birth, photograph (optional).
- **Contact details:** e.g. email address, postal address, telephone number.
- **CV data:** e.g. information provided through job applications, CVs, and interviews, educational background, professional qualifications, skills, employment history.
- **Information included in your cover letter or other supporting documents.**

- **Recruitment process data:** records of correspondence between you and the Company, records related to your progress and evaluation throughout the recruitment process.
- **Reference data:** references or other information obtained from former employers or other individuals whom you have authorized us to contact.
- **Any other data you voluntarily submit through your application.**

We may also collect information from publicly available professional profiles (e.g. LinkedIn) where necessary.

Please note that when you access and use the Workable platform, Workable Software Limited may collect certain technical and usage data (such as traffic data, location data, logs, referring website, and resources accessed) through its own website. This processing is carried out under the responsibility of Workable as an independent data controller and is subject to Workable's own Privacy Policy, available here: [Privacy policy | Workable](#).

## **5. Information from Other Sources**

In addition to the information you choose to share directly with us, we may also review limited information about you from other lawful sources, such as:

- Public professional profiles (e.g. LinkedIn), insofar as they are relevant to the role for which you are applying.
- References or recommendations provided by individuals or organizations who recommend you as a candidate.

We use this information solely to support the recruitment process and to evaluate your application.

## **6. Legal Basis for Processing**

We rely on the performance of a contract for the collection and use of your personal data at the pre-contractual stage in order to enter into an employment contract. The provision of data is necessary because it constitutes a prerequisite for the possible conclusion of such a contract. Therefore, failure to provide the requested personal data will make it impossible to take steps towards entering into a contract.

We also rely on our legitimate interests as a legal basis for collecting additional information and references relating to your qualifications and experience, in order to further assess your suitability for the role.

## **7. Purposes of Processing**

The personal data we collect are processed for the following purposes:

- To review your application in relation to the position for which you have applied.
- To review your application in the context of other available positions.

- To manage and organize the recruitment process (including communicating with you regarding your application, arranging interviews, and providing updates on the progress of your candidacy).
- To enrich the information we receive from you with data obtained from third-party providers, in line with our legitimate interest in making well-informed and fair hiring decisions.

## **8. Automated Decision-Making / Profiling**

We may use Workable's technology to identify suitable candidates for review based on criteria explicitly defined by us or typically associated with the role for which you have applied. While the process of identifying suitable candidates is automated, any final decision about whom we hire to fill the position will be made by our staff. Such a decision is necessary for the conclusion of a contract between the candidate and us and for the performance of that contract and will always involve human intervention.

## **9. Recipients of Your Personal Data**

Your personal data may be shared with certain third parties, only when necessary and in accordance with applicable data protection laws. Such recipients may include:

- Our third-party online applications provider, Workable, acting as a Data Processor under our instructions.
- Third-party service providers (e.g. technical support) where strictly necessary and under confidentiality agreements.
- Any other administrative, judicial, or public authority, as well as any natural or legal person to whom the Company is required or entitled to disclose such data under law, court order, or in order to safeguard its legitimate interests.

We have taken all necessary measures to ensure that our staff and partners are duly authorized to process your personal data for the above purposes and are fully bound by confidentiality and compliance with all legal obligations relating to the collection and further processing of your data.

## **10. Security of Your Personal Data**

The Company applies appropriate technical and organizational measures aimed at ensuring the secure processing of personal data and preventing accidental loss or destruction, as well as unauthorized and/or unlawful access, use, alteration, or disclosure. In order to guarantee an adequate level of security against risks and to select the appropriate technical and organizational measures, the Company takes into account the latest technological and other developments, the cost of implementation, the nature, context, and purposes of the processing, as well as, on the one hand, the likelihood and risk of events involving accidental loss, destruction, or unauthorized and/or unlawful access, use, modification, or disclosure of personal data, and on the other hand, the severity of potential consequences for the rights and freedoms of natural persons.

We store your data securely at our facilities, using advanced, protected servers and systems designed to safeguard your information. Our infrastructure and procedures strictly comply with all relevant data protection laws and industry standards, ensuring

that your data remains confidential, protected from unauthorized access, and handled with the utmost care and responsibility.

## 11. Data Transfers

Your personal data may be transferred to and stored outside the European Economic Area (“EEA”) when processed through Workable’s services. In such cases, we ensure that appropriate safeguards are in place, such as an adequacy decision by the European Commission or the use of Standard Contractual Clauses approved by the European Commission, in order to guarantee that your data are protected at a level equivalent to that within the EEA.

## 12. Data Retention Period

We will retain your personal data for up to 24 months after the submission of a job application, unless a longer period is required by law or you provide your consent for further retention in our CV database. After the above period, your data will be securely deleted.

## 13. Your Rights

Under the GDPR you have a number of important rights which you may exercise free of charge. In summary, these include the following:

- **Right of access:** You have the right to be informed and to verify the lawfulness of processing. Accordingly, you are entitled to access your data and receive additional information about how your data are being processed.
- **Right to rectification:** You have the right to review, correct, update, or amend your personal data by contacting our DPO and submitting the relevant documentation.
- **Right to erasure (“right to be forgotten”):** You have the right to request the deletion of your personal data when processing is based on your consent or carried out to safeguard our legitimate interests. In all other cases, this right is subject to specific limitations or may not apply, depending on the circumstances.
- **Right to restriction of processing:** You have the right to request the restriction of processing of your personal data in the following cases: (a) when the accuracy of the data is contested and until it is verified; (b) when you oppose the erasure of data and request restriction of processing instead; (c) when personal data are no longer necessary for the purposes of processing but are required for the establishment, exercise, or defence of legal claims; and (d) when you object to processing and until it is verified that there are legitimate grounds overriding your objection.
- **Right to object to processing:** You have the right to object at any time to the processing of your personal data when, as described above, such processing is necessary for our legitimate interests as controller, as well as to processing for direct marketing purposes and profiling for consumer behaviour.
- **Right to data portability:** You have the right to receive your personal data free of charge in an accessible and machine-readable format, and to request their transfer, where technically feasible, to another controller. This right applies to

data you have provided to us that are subject to automated processing based on your consent or on the performance of our contract.

- **Right to withdraw consent:** Where processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

The exercise of any of the above rights is carried out by submitting a written request to our Company, which we are committed to responding to within one (1) month of receipt. This deadline may be extended by two (2) additional months, taking into account the complexity of your request as well as the total number of requests received.

#### **14. Right to Lodge a Complaint**

If you exercise any of your rights and are not satisfied with our response, you have the right to lodge a complaint with the Hellenic Data Protection Authority through its online portal (<https://eservices.dpa.gr/>). For more information, you may visit the website of the Hellenic Data Protection Authority at <https://www.dpa.gr/>.

#### **15. Amendments/Updates to this Notice**

The Company may amend or update this Notice whenever there are significant changes to its processing activities, applicable legislation, or business procedures.