

## INFORMATION REGARDING PROCESSING OF PERSONAL DATA

### WE CARE ABOUT YOUR PRIVACY

Your trust is important to us. Our aim is that you feel safe when you share your personal data with us. Personal data is any information that can be used to identify an individual.

We take appropriate measures to ensure that your personal data always is safe with us and that the processing of your personal data is compliant with present data protection laws, our internal policies, guidelines, and routines. We have also assigned a Data protection officer whose task is to monitor that we follow these laws, guidelines, and routines.

It is important for us to be transparent with how we handle your personal data. In this information text, we therefore describe how and where we process personal data in the context of **recruitment process for cross-border Baltic vacancies**.

### WHICH CATEGORIES OF PERSONAL DATA DO WE COLLECT AND WHY

It is your responsibility to provide only valid and genuine personal data and only such data as are appropriate and necessary for the purpose of fulfilling the objectives mentioned in this information text. In some cases, depending on the type of vacancy, we may ask you for additional information, for example, information about existence of driver's license. If you submit information that is not required for the recruitment process, it will not be taken into account.

If you do not agree to the processing of personal data as described in this information text your application will not be evaluated during the recruitment process.

You can submit an application, and exercise the rights in this information text if you are at least 18 years of age or in exceptional cases at least 15 years old.

- **Evaluation of application during recruitment process**

We process your personal data in order to evaluate your application during our recruitment process:

- if you apply for a specific vacancy;
- if you submit an application;
- if we have contacted you by cooperating with a recruitment company, or based on the professional information available in your profile in widely used and/or public career portals or databases (for example, but not limited to LinkedIn, CV Online, CV Keskus) or based on your friend's or acquaintance's recommendation;
- if we receive an application from an employment agency within the framework of our cooperation, for example, an EU-financed project managed by the State Employment Service, Unemployment Fund.

Categories of personal data	Legal basis	Retention period
<ul style="list-style-type: none"> <li>• <b>Identity information,</b> <i>e.g., name, surname, username, customer ID etc.</i></li> <li>• <b>Contact details,</b> <i>e.g., email, phone number, address etc.</i></li> <li>• <b>Competence data,</b> <i>e.g., professional experience, education, certifications, courses, language skills etc.</i></li> <li>• <b>Reference data,</b> <i>e.g., characteristics of the person etc.</i></li> <li>• <b>Assessment information</b> <i>e.g., performance assessment, rating, tests, evaluations etc.</i></li> </ul>	Your consent and our legitimate interest to ensure our company's operations	See section “ <b>For how long are my personal data stored?</b> ”

- **Collection and assessment of references about the applicant**

We process your personal data in order to collect and assess references about the applicant during the recruitment process if the applicant has indicated you as a reference provider.

If the applicant previously worked for us then we may ask references also from our own people who have worked with the applicant.

Categories of personal data	Legal basis	Retention period
<ul style="list-style-type: none"> <li>• <b>Competence data,</b> <i>e.g., professional experience, education, certifications, courses, language skills etc.</i></li> <li>• <b>Performance data,</b> <i>e.g., goals, achievements, statistics about efficiency etc.</i></li> <li>• <b>Reference data,</b> <i>e.g., characteristics of the person etc.</i></li> </ul>	Applicant's and your consent	See section “ <b>For how long are my personal data stored?</b> ”

- **Collection of applicants feedback about recruitment process**

We process your personal data in order to send you recruitment process evaluation form. Input from candidate is anonymous and is collected to improve our internal processes and overall applicant experience.

Categories of personal data	Legal basis	Retention period
<ul style="list-style-type: none"> <li>• <b>Feedback data</b></li> </ul>	Your consent	See section “ <b>For how long are my personal data stored?</b> ”

- **Background check of final candidates for specific positions**

We might process your personal data to obtain information of recommendative nature about your suitability to apply for the position and mitigate business risks related to human resources and to protect Rimi assets. Within recruitment process background checks might occasionally be carried out only on final candidates applying for specific sensitive positions requiring greater responsibility (i.e., positions within the company which take up legal and financial responsibilities for the company, have substantial impact on business partner selection and spending, has a high-profile representative function, e.g., top management, managerial

positions in specific corresponding departments). The background check can be initiated by the person who starts the recruitment (e.g., recruitment specialist). During the background check it may be investigated whether you have a clear conflict of interest, an exceptionally bad reputation in the media (applicable to representative positions with high public exposure), financial distress (e.g., bankruptcies, forced debt recovery; applicable to finance positions with direct access to Rimi financial assets).

Categories of personal data	Legal basis	Retention period
<ul style="list-style-type: none"> <li><b>Identity information,</b> <i>e.g., name, surname, username, customer ID, etc.</i></li> <li><b>Employment information,</b> <i>e.g., time and date of employment, type of employment, position, job duties, work permit etc.</i></li> <li><b>Information on secondary occupations and conflicts of interest,</b> <i>e.g., type of secondary job, financial interest in other companies, conflicts of interest, etc.</i></li> <li><b>Credit information,</b> <i>e.g., credit records, solvency, credit worthiness, etc..</i></li> </ul>	Our legitimate interest to mitigate business risks related to human resources and to protect Rimi assets.	See section “ <b>For how long are my personal data stored?</b> ”

- Management of legal claims**

We might process your personal data what was taken into account within evaluation of recruitment process in order to establish, exercise and defend legal claims.

Categories of personal data	Legal basis	Retention period
Personal data that we already have about you: <ul style="list-style-type: none"> <li><b>Identity information,</b> <i>e.g., name, surname, username, customer ID etc.</i></li> <li><b>Contact details,</b> <i>e.g., email, phone number, address etc.</i></li> <li><b>Competence data,</b> <i>e.g., professional experience, education, certifications, courses, language skills etc.</i></li> <li><b>Reference data,</b> <i>e.g., characteristics of the person etc.</i></li> <li><b>Assessment information</b> <i>e.g., performance assessment, rating, tests, evaluations etc.</i></li> </ul>	Our legitimate interest in establishing, exercising or defending legal claims.	See section “ <b>For how long are my personal data stored?</b> ”

## FROM WHICH SOURCES DO WE COLLECT PERSONAL DATA?

- Yourself**

We collect the personal data you provide to us regarding yourself, such as when you are submitting an application, contact us and etc.

- **Other sources**

We may collect the personal data from a recruitment company, or career portals or databases where you have posted your CV (for example, but not limited to LinkedIn, CV Online, CV Keskus) or from your friend's or acquaintance's who has recommended you as a candidate, or an employment agency, or education provider or organization that promotes education.

We may collect the personal data during the background check also from external information systems and databases, e.g., from the Commercial Register, Real Estate Register, Credit Information Registers, public information search engines (such as Google), social platforms (only publicly available information, e.g., LinkedIn)

## **SHARING OF PERSONAL DATA**

- **Service providers**

We share your personal data with companies that provides services to us, for example, recruitment company. These companies can only process your personal data according to our instructions and not use them for other purposes. They are also required by law and our cooperation agreement to protect your personal data.

- Data Centre service providers,
- Databases and recruitment channels,
- Recruitment companies,
- Information system development and maintenance service providers.

- **Group companies**

We may share your personal data with relevant Rimi Baltic group companies if your application is related with other(s) Rimi Baltic group company (-ies).

- **Law enforcement authorities, state and local government institutions**

We may transfer your personal data to law enforcement authorities, state and local government institutions upon their request. We may also transfer your personal data to law enforcement authorities, state and local government institutions in order to meet our legitimate interest in establishing, claiming and defending legal claims.

## **WHERE DO WE PROCESS YOUR PERSONAL DATA?**

We always aim to process your personal data within EU/EEA. Your personal data is not transferred or processed in a country outside EU/EEA.

## **FOR HOW LONG ARE MY PERSONAL DATA STORED?**

Recruitment and personal data necessary for feedback about recruitment process:

Up to 8 (eight) months from the date of submission or receiving of applicant's personal data in Latvia.

Up to 8 (eight) months from the date of submission or receiving of applicant's personal data in Lithuania.

Up to 12 (eight) months from the date of submission or receiving of applicant's personal data in Estonia.

Personal data necessary for background checks:

Personal data are processed only from the moment the background check is initiated during the recruitment process till the end of recruitment process. No records kept of the actual background check.

If there was a legal claim, then we retain your personal data till the completion of respective investigation and legal claim settlement

## **YOUR RIGHTS**

Data protection laws give you a number of rights with regards to the processing of your personal data.

- **Access to personal data**

You are entitled to request confirmation from us if we process personal data relating to you, and in such cases request access to the personal data we are processing about you. To carry out the mentioned right, you also can provide a written request to us or to our Data protection officer.

- **Rectification of personal data**

Furthermore, if you believe that information about you is incorrect or incomplete, you have the right to correct it yourself or ask us to do it. To carry out the mentioned right, you also can provide a written request to us or to our Data protection officer.

- **Withdrawal of consent**

To the extent that we process your personal data based on your consent, you are entitled to, at any time, withdraw your consent to the personal data processing. To carry out the mentioned right, please, provide a written request to us or to our Data protection officer.

- **Objection against processing based on a legitimate interests**

You are entitled to object to personal data processing based on our legitimate interests. However, we will continue to process your data, even if you have objected to it, if we have compelling motivated reasons for continuing to process data. To carry out the mentioned right, please, provide a written request to us or to our Data protection officer.

- **Erasure**

Under certain circumstances, you have rights to ask us to delete your personal data. However, this does not apply if we are required by law to keep the data. To carry out the mentioned right you also can provide a written request to us or to our Data protection officer.

- **Restriction of processing**

Under certain circumstances, you are also entitled to restrict the processing of your personal data. To carry out the mentioned right, please, provide a written request to us or to our Data protection officer.

- **Data portability**

Finally, you have the right to receive or transmit your personal data further to another data controller ("data portability"). This right solely covers only data what you have provided to us based on you

consent or on a contract and where processing is carried out by automated means. To carry out the mentioned right, please, provide a written request to us or to our Data protection officer.

## WHO DO I CONTACT IF I HAVE ANY QUESTIONS?

If you have any questions about the processing of your personal data, please feel free to contact us.

If you are not satisfied with the response you received, you are entitled to file a complaint with the Data Inspectorate.

- **Contact details of company in charge of handling your personal data**

Due to this is cross-border recruitment then we have established joint ownership and responsibility between all our companies on being responsible for your data handling. Towards you company in charge of handling your personal data is Rimi company in your respective country.

If you wish to contact us or carry out your rights mentioned in this information text then please contact Rimi company in your respective country and we will make sure that all our companies (*mentioned below*) who might handle your personal data within recruitment process respects your rights.

**SIA Rimi Baltic**, registration number 40003592957  
Legal address: A. Deglava iela 161, Riga, Latvia, LV-1021  
Phone number: +371 67045409  
Email address: [info.lv@rimibaltic.com](mailto:info.lv@rimibaltic.com)

**SIA Rimi Latvia**, reg. No. 40003053029,  
Legal address: 161 A. Deglava iela, Riga, Latvia, LV 1021  
Phone number: +371 67045409  
Email: [info.lv@rimibaltic.com](mailto:info.lv@rimibaltic.com)

**Rimi Eesti Food AS**, reg. No. 10263574  
Legal address: Põrguvälja tee 3, Pildiküla, Rae vald Eesti  
Phone number: +373 6059400  
Email: [info.ee@rimibaltic.com](mailto:info.ee@rimibaltic.com)

**UAB „Rimi Lietuva“**, reg. No. 123715317,  
Legal address: Kedrų g. 4, Vilnius, Lietuva, LT03116  
Phone number: +370 5 2461057  
Email: [info.lt@rimibaltic.com](mailto:info.lt@rimibaltic.com)

- **Contact details of the Data protection officer**

Email: [RimiDPO@rimibaltic.com](mailto:RimiDPO@rimibaltic.com)

You also can contact our Data protection officer by sending a letter to us at the above-mentioned address and addressing it to the Data protection officer.