

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF CANDIDATES FOR
EMPLOYMENT/INTERNSHIP IN

KBC Asset Management NV - branch, Bulgaria

The protection of your personal data is important to us. We have taken the necessary organisational and technological measures to process your personal data in a lawful, appropriate and transparent manner. The present information bulletin on the processing of personal data explains what personal data we will process about you as a job or internship applicant, for what purposes and on what grounds, the categories of recipients and the period for which we will retain such data. This document also contains information about your rights and how you can exercise them.

1. Information about the controller

KBC Asset Management N.V. – Bulgaria branch (hereinafter referred to as the Employer/Controller/Branch), is a foreign trader branch (KBC Asset Management N.V., Belgium), and is registered in the Commercial Register with the Registry Agency under UIC 205422541, with its registered office and registered address at: 1463 Sofia, 89B, Vitosha Blvd.; official website: www.ubbam.bg; e-mail address: ubbam@ubb.bg. The branch is a part of KBC Group - a banking and insurance group of companies which, in cooperation, create and distribute banking, investment and insurance products and offer financial services related to these products. Within the meaning of §1, item 1 of the Supplementary Provisions of the Labour Code, the Branch is an employer with respect to persons it independently employs as employees under an employment relationship.

2. Purposes and legal grounds for processing personal data in recruitment procedures

The personal data we require from you when applying for a job is collected for the purpose of selecting and choosing a suitable candidate for the advertised position. The legal basis for the processing of personal data collected in recruitment procedures is the taking of steps at the request of the data subject prior to entering into a contract. The provision of the personal data requested by the employer in the advertisement for the position is voluntary and a necessary condition for applying for a job or internship.

The personal data may be used to inform you about future vacancies in the Branch or in the corporate group that may be of interest to you, provided that you have given your explicit consent for this. The legal basis for processing data for this purpose is consent. Consent may be withdrawn by the subject in writing and at any time during data processing in accordance with section 6 of the present bulletin.

We may rely on our legitimate interest or the legitimate interest of a third party when processing personal data for the establishment, exercise and defence of legal claims, e.g. when storing data within the limitation period for such claims; to ensure the physical or information security of the resources we manage and use; when transferring personal data within the corporate group, where this is necessary in the course of organising and conducting the recruitment of candidates for the relevant position.

Where you have applied for a position through your LinkedIn profile on an advertisement posted through our corporate LinkedIn profile, we may process for recruitment purposes the information contained in your LinkedIn profile where it is publicly accessible in accordance with the settings you have selected as a platform user and account holder. If you do not wish your profile data to be processed for the purposes of a particular selection, you can make an active choice through the platform itself, or object to such processing by notifying us by means of an application for the exercise of rights, which will be reviewed in accordance with the disclosures in this document.

When processing personal data in recruitment procedures, data subjects are not subject to decisions based solely on automated processing, including profiling.

3. Personal data categories

When you apply for a job or internship with us, we will process personal data that you have provided when applying for a specific position or that has been obtained in direct contact with you in the course of a conversation or in-person interview. We may process a limited set of your personal data (names, email address and/or telephone number) obtained from a current employee of ours or an employee of a KBC Group company who has recommended you as a suitable candidate for an open position. In this case, if we are interested, an employee will contact you for more information, to request your CV or to arrange a meeting/job interview.

We process the following categories of personal data for the purposes of recruitment procedures:

- Identification data (e.g., names, date and place of birth, nationality, photograph (where provided by the applicant), correspondence address, e-mail, telephone number);
- Social identity (e.g., educational degree, qualifications, professional experience including specific work experience, foreign language fluency level, scientific/academic degree, additional qualifications, etc.)
- Other categories of data, if any, required by official regulations for the advertised position, and any information that the candidate has voluntarily and on his/her own initiative decided to provide.

During the application process, the applicant may be asked to provide details of a previous employer or contact person, including an educational establishment, for the purpose of obtaining or checking references.

We will not ask you to provide personal data which fall within the special categories of personal data, including data concerning ethnic origin, political opinions, religious or philosophical beliefs, health data or data concerning an individual's sex life or sexual orientation.

The information about job/internship applicants that the Controller collects and processes is appropriate, relevant and necessary for the specific purposes for which it was obtained and processed. Applicants are informed that the information they provide should be up-to-date, accurate and complete in order to enable the selection process to proceed properly.

Failure to provide data or the provision of incorrect data will prevent us from assessing your application and may prevent your participation in the selection process for the position for which you are applying.

4. Data retention period

Personal data contained in the documents you provide when applying, such as CVs, cover letters, documents proving qualifications and experience and other documents submitted or collected for selection purposes, as well as copies thereof, will be kept for a period of 6 (six) months from final conclusion of the selection procedure for which you are applying. The data may be retained and used for a longer period (up to one year), in the event that you have provided your express consent to the processing of such data for suitable future positions in the Branch or in other companies, part of the corporate group.

Personal data of participants in a recruitment procedure contained in the internal documents created by the employer concerning the recruitment and selection procedures may be stored for the 3-year period provided for in Article 52 of the Protection against Discrimination Act (in accordance with Statement No. НДМСПО-01-211/2019 of the Commission for Personal Data Protection).

In cases where an employment contract is not concluded or the employment relationship with the selected candidate is deemed not to have been established within the meaning of the Labour Code, all original documents provided by the candidate shall be returned.

5. Categories of Personal data recipients

Access to the data of candidates for employment and internship is granted to authorised employees, the management of the Branch, persons and units of the corporate group involved in the organisation and implementation of the specific recruitment procedure. These persons are bound by confidentiality clauses in relation to the processing of personal data in the course of and in connection with the performance of their duties. If your participation in a recruitment procedure is carried out through an intermediary, registered as a recruitment agency, or through internet-based platforms that allow you to publish job advertisements and apply through the relevant platform (jobs.bg, zaplata.bg, LinkedIn, etc.), please ensure that you have read the information on the processing of personal data by these entities.

6. Rights of personal data subjects and the procedure for exercising them.

As a Data Subject, you have certain rights which you may exercise by submitting an application. You have the right to access your personal data which we process. In addition, you have the right to ask us to correct inaccuracies in your personal data and, if you have grounds and set out your reasons for doing so in writing, you can request that we cease unwarranted processing of your personal data. You have the right to withdraw your consent to the processing of personal data at any time, which will not affect the lawfulness of processing based on consent prior to such withdrawal.

You may exercise your rights in one of the following ways:

- electronically, by submitting an application to ubbam@ubb.bg - the application must be signed with an electronic signature in accordance with the Electronic Document and Electronic Certification Services Act;
- by written application to the address of the Branch: Sofia 1432, 89B, Vitosha Str.

The application should contain:

1. name;
2. description of the request;
3. the preferred form for receiving information - electronic or paper;
4. signature, date of application and contact address.

Where the application is filed by an authorised person, the authorisation must be attached to the application.

Where the controller has reasonable concerns about the identity of the natural person making a request for the exercise of rights under this Section, the controller may request the provision of additional information necessary to confirm the identity of the data subject.

A data subject has the right to lodge a complaint with a supervisory authority if he or she considers that the processing of personal data concerning him or her infringes the provisions of the General Data Protection Regulation (Regulation (EU) 2016/679). In the Republic of Bulgaria, the supervisory authority under Regulation (EU) 2016/679 is the Commission for Personal Data Protection (www.cdpd.bg).