

Privacy Notice Job Applicants

If you are applying for a position at CARDIGOS, this Privacy Notice applies to you and aims to provide information related with the processing of your personal data which starts from the moment you submit your application.

When processing your personal data as described in this Privacy Notice, CARDIGOS takes the position of a Controller.

CARDIGOS may change this Privacy Notice from time to time without previous notice, thus we advise you to check this notice on a regular basis. This version of the Privacy Notice was published on 2018-07-30.

1. What type of personal data do we process?

When you submit an application we process the following types of personal data:

- **Identification data:** *e.g.* name, date of birth, gender, nationality, number of identification document, taxpayer number.
- **Contact details:** *e.g.* address, e-mail, telephone number and/or mobile phone number.
- **Information related to your curriculum vitae (cv) / application:** *e.g.* information related to your education and work experience, academic achievements and qualifications, personal skills, fluency in languages as well as any other information that you decide to include in your curriculum (cv) / application (*e.g.* *LinkedIn* page).
- **Motivation letter and/or e-mail:** any information that you decide to include in your motivation letter.

Additionally, we may obtain certain information from third persons:

- **Referrals:** we may obtain referrals from third persons who have worked with you in the past. Generally, we will only contact them if you provide us with their names and contact details.

Moreover, we may collect images (photographs and video) through the security system installed in CARDIGOS. Whenever any image is collected for this purpose your consent will be requested (which must be freely given, specific, informed and unambiguous).

In certain circumstances and always with your consent (which must be freely given, specific, informed and unambiguous), we may process specific categories of personal data (usually identified as “sensitive data”, such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs).

2. Why do we process your personal data?

CARDIGOS processes your personal data for the following purposes:

- **Recruitment:** we process your personal data to ascertain your qualifications for the purpose of conducting the recruitment process.
- **Dispute resolution:** we may process your personal data for the purpose of establishing, exercising or defending legal claims in judicial proceedings or for resolving disputes, complaints or other legal procedures.

- **Compliance with legal obligations:** we process your personal data to comply with legal obligations.
- **Security and protection of CARDIGOS' premises:** we process your personal data for this purpose (*i.e.* collecting images), always with your consent.

3. To whom do we transfer your personal data?

CARDIGOS may have to transfer your personal data to other entities, in the following circumstances:

- If you have provided us with contact details from third persons for the purpose of obtaining referrals (under the terms mentioned above), we will have to share with them your name and any other information required for them to provide us with relevant information regarding yourself.
- We may need to transfer your personal data to our processors (such as service providers). In these cases, the third parties that provide services to us may only process your personal data for the purposes mentioned above and in accordance with the instructions provided by CARDIGOS for that end.
- Your personal data may be processed by CARDIGOS' lawyers and employees. The access to your personal data is restricted and will be granted only if necessary and for the purposes described above. However, please note that our lawyers and employees are subject to strict confidentiality obligations.
- We may share information regarding the filling of positions to the universities or other entities which have sent us your cv, provided that they have obtained your consent thereto.
- We may share your personal data if required to comply with legal obligations.

4. To which countries do we transfer your personal data?

Your personal data will not be transfer to any country located outside the European Union and/or European Economic Area (EU/EEA). However, your personal data might be transferred to other countries located inside the EU/EEA.

5. For how long do we keep your personal data?

CARDIGOS will only keep your personal data during the period required to fulfil the purpose, for the aim and for the effect for which they were collected. This means that CARDIGOS will only keep your personal data during the course of the recruitment process. CARDIGOS will delete your personal data after the position has been filled or at most after one year from the date we have received your cv and collected all related information. If you are selected to fill the position you applied for, we will keep your personal data for the aim and for the effect of maintaining your internal file as a lawyer or employee of CARDIGOS, in accordance with our Privacy Notice for Lawyers and Employees. We may also need to keep your personal data for the purpose of compliance with tax obligations (during a 10 year period) in case you are selected and participate in a remunerated internship.

Additionally, please note that CARDIGOS may keep your personal data for a longer period, after the recruitment process has ended, if there is a pending dispute or if you have given us your consent thereto.

Lastly, in case images are collected, these will only be kept for a period of 30 days.

6. What is the legal basis for the processing of your personal data?

CARDIGOS processes your personal data based on your consent, which is freely given, specific, informed and unambiguous, by sending your application and participating in the recruitment process. In certain situations, CARDIGOS may process your personal data to comply with legal obligations. If, for security reasons, any image is collected, we will process your data based on your consent.

7. Your rights as data subject

Data subject are entitled to specific rights under the applicable data protection legislation.

Right of access

You may request a copy of your personal data undergoing processing by us. You may also request for additional information regarding the way we process your personal data.

As a rule, all the information provided by CARDIGOS related to data processing will be sent in writing, unless otherwise requested. If you made the request by electronic means, the information will be provided through the same means, if possible.

Right to rectification

CARDIGOS takes all the necessary measures to ensure that the personal data processed is accurate and complete. However, in case you find the information we hold about you inaccurate or no longer updated, please contact us so we can update/rectify the information in accordance with your instructions.

Right to erasure («right to be forgotten»)

In certain circumstances you may have the right to have your personal data erased from our files, *e.g.* if you find the processing of your personal data is no longer necessary for the purpose which based their collection or if you withdraw your consent. However, it will be necessary to balance such situations with other factors. For example, CARDIGOS may need to process your personal data to comply with legal obligations and in such case we have to continue to process your personal data.

Right to restriction of processing

In certain circumstances, you are entitled to request restriction of processing of your personal data, if you have requested the rectification of such data (and from that moment on), or if you have objected to such processing by CARDIGOS, until we can analyse your request and confirm the accuracy of your personal data (and/or proceed with the rectification of such personal data according to your instructions).

Right to data portability

In certain circumstances, you have the right to request the transfer of the personal data we process about you to a third entity of your choice.

Rights relating to automated individual decision-making

CARDIGOS does not process personal data for the purpose of automated individual decision-making.

Right to withdraw consent

CARDIGOS processes your personal data based on your consent, wherefore you are entitled to withdraw your consent at any moment. In such case, we cannot continue to process your personal data, which means we will

necessarily need to disregard your application. However, please note that we may need to process your personal data to comply with legal obligations.

8. Complaints about personal data processing and exercise of rights

If you have a complaint about how we process your personal data or if you wish to exercise any or all of the above mentioned rights, you may contact CARDIGOS by e-mail to gdpr@cardigos.com. You may also visit us at our offices located at Praça Nuno Rodrigues dos Santos, 14B, 1600-171 Lisbon, Portugal, or contact us by phone at +351 21 330 39 00 (available from 9:15 a.m. to 7:00 p.m. GMT).

If you disagree with the content of our answer or if you find the processing of your personal data by CARDIGOS unlawful, you may report the situation to the Portuguese supervisory authority (*Comissão Nacional de Protecção de Dados*). You can find more information about *Comissão Nacional de Protecção de Dados* and its reporting process at www.cnpd.pt.

If you have any other question about how we process your personal data, please contact us. We will analyse your requests as soon and thoroughly as possible.

9. Additional information

CARDIGOS informs all potential applicants that if any other data apart from the personal data mentioned at paragraph 1 (**What type of personal data do we process?**) of the present Privacy Notice is received we will invalidate such data to ensure it will not be used. CARDIGOS will, for example, destroy any copy of an identification document and/or driving license.
