



Baltic International Bank

APPROVED  
At Baltic International Bank SE  
Management Board Meeting  
held on 18 February 2021  
Minutes No. 01-05/09/21

**Baltic International Bank SE**  
**PERSONAL DATA PROCESSING NOTICE TO DATA SUBJECTS**  
**PURPOSES OF PROCESSING DATA OF APPLICANTS AND TRAINEES**

**1. Information about the data controller**

Our company name is **Baltic International Bank SE** (hereinafter also referred to as the Bank),  
Registration Number: 40003127883,  
Registered Address: Kalēju iela 43, Rīga, LV-1050

You may contact us as follows:

- by calling [\(+371\) 6700 0444](tel:+37167000444);
- by e-mailing to: [info@bib.eu](mailto:info@bib.eu).

**2. Contact information for communication on personal data protection matters**

Should you have any questions in relation to this Notice or the processing of your personal data, please do not hesitate to contact us by using the communication channels defined by Clause 1 or sending a message to the below electronic mail address: [dataprotection@bib.eu](mailto:dataprotection@bib.eu).

**3. General description of the personal data processing carried out by us**

This Notice describes how we carry out the processing of personal data of applicants to vacancies and other persons whose personal data we may obtain in relation to the personnel recruitment.

This Notice is aimed at enabling persons to apply for published vacancies in our company and other companies within our company group, as well as to enable other persons, whose data have been provided to us by applicants (for instance, the data of entities providing references), to familiarise themselves with our personal data processing rules.

This is the most recent version of the Notice. We reserve the right to make amendments and / or update this Notice from time to time.

The purpose of this Notice is to give you a general overview of our personal data processing activities and purposes; however, please note that also other documents (for instance, the terms of use of the Internet website (available at <https://www.bib.eu/lv/dokumenti#A5>)) may provide additional information about the processing of your personal data.

We are aware that personal data present a value for you and we will process it in accordance with the confidentiality requirements and taking care of the security of your personal data at our disposal.

**4. For what purposes do we process your personal data and what is the lawful basis for the processing of personal data?**

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We will process your personal data only for the defined legitimate purposes, including the following:

**a) Provision of the employee selection process and implementation of the rights and obligations arising under it –**

Within the scope of this purpose, we collect CVs and enclosed documents from the applicants, contact applicants and the referees specified by the applicants to collect references; subject to the applicant's consent, we store CVs for other competitions; also, to be able to defend our interests in litigation, we store data to reply to claims and lawsuits filed in courts.

For this purpose and the above sub-purposes, we may require at least the following personal data: the applicant's first name, surname, contact information (e-mail, telephone number), applicant's education and previous work experience, persons who can give references and their contact details, references on the applicant as well as other information that may be relevant for the respective position and identification of the most suitable applicant.

The main legal basis for the fulfilment of the above purposes are as follows:

- consent (Article 6(1)(b) of the General Data Protection Regulation<sup>1</sup>) – in relation to the fact of submission of the CV and storing the CV for further competitions;
- entry into a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation) – in relation to the processing of personal data of the applicants with whom the employment contract or the traineeship contract will be concluded;
- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation – in some cases, in relation to the specific data types if the regulatory enactments stipulate mandatory requirements for the specific position;
- the legitimate interests pursued by the Data Controller (Article 6(1)(f) of the General Data Protection Regulation) – in relation to the provision of proof in the event of potential claims as well as in relation to the amount of information required.

**b) Entering into the employment or traineeship contract –**

Within the scope of this purpose, we collect information that needs to be included in the employment or traineeship contract and its annexes; we will identify you, verify your qualification documents, draw up the employment or traineeship contract.

For this purpose, we may require at least the following personal data: the employee's or trainee's first name, surname, identity number, residential address, telephone number, commencement date of the employment relationship or traineeship, place of work, employee's education data, employee's qualification data, description of the job duties to be performed, position, work contact details, amount of salary, current account number;

<sup>1</sup> Regulation (EE) 2016/679 of The European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

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if necessary, health data, for instance, data regarding disability.

The main legal basis for the fulfilment of the above purposes are as follows:

- entry into and performance of a contract with the data subject (Article 6(1)(b) of the General Data Protection Regulation);
- compliance with legal obligations (Article 6(1)(c) of the General Data Protection Regulation – in relation to the information to be specified in the employment contract and the applicable qualification requirements, as well as reporting the employment to the state authorities (for instance, the State Revenue Service);
- carrying out the obligations and exercising rights of the data controller in the field of employment (Article 9(2)(b) of the General Data Protection Regulation) – in relation to the processing of special categories of data (health data, trade union membership).

**c) Prevention of threat to security, property interests, and our other legitimate interests or legitimate interests of third parties**

Within the scope of this purpose, we would need to perform video surveillance of our area, buildings and other properties, use personal data processors to ensure different functions and, if needed, exchange information within the group of the companies, exercise the statutory right to pursue own legitimate interests.

For this purpose, we may need to process at least the following personal data: data in the video recordings, data on premise visits recorded by the access control systems, etc.

The main legal basis for the fulfilment of the above purposes are as follows:

- legitimate interests of the data controller (Article 6 (1)(f) of the General Data Protection Regulation);

#### 5. Why should you provide your personal data to us?

We mainly collect your information for the purposes of the personnel selection process or providing traineeship to you, to comply with our binding legal obligations and pursue our legitimate interests. In these cases, we need to obtain the specific information to meet the respective purposes, thus, a failure to provide such information may endanger the commencement of the employment relationship. If data is not mandatory necessary, but its submission could help improve the work environment or your employment conditions, we will specify that data submission is voluntary.

#### 6. How do we obtain your personal data?

We can obtain your personal data in any of the following manners:

- 1) from you by submitting an application and CV to participate in the competition for a job or traineeship vacancy;
- 2) from the applicant if he or she has specified your personal data for receiving references on him or her;
- 3) in the process of entering into a contract when you yourself provide data to us;
- 4) from you when you submit any application to us, send emails, or call us;
- 5) from you if you provide information about the applicant;
- 6) where applicable, from video surveillance recordings and access control systems.

**7. Who could access your personal data?**

We implement the respective measures to process your personal data in accordance with the applicable legislation and ensure that your personal data is not accessed by third parties who do not have the appropriate legal basis for the processing of your personal data.

If necessary, your personal data may be accessed by:  
our employees and employees of other companies within our group of companies or directly authorised persons who need it to perform their official duties, for instance, accountants, direct supervisors, employees of the HR Management Directorate.

**8. What counterparties in the personal data processing or personal data processors do we choose?**

We implement the respective measures to ensure the processing, protection and transfer of your personal data to data processors in accordance with the applicable legislation. We carefully select personal data processors and, upon making data transfer, we evaluate its necessity and the amount of data to be transferred. Data transfer to processors is carried out subject to the requirements of confidentiality and secure processing of personal data.

At present, we may cooperate with the following personal data processor categories:

- 1) outsourced accountants, auditors, financial management and legal advisers;
- 2) owners/developers/maintainers of the IT infrastructure, database;
- 3) other persons related to provision of our services;
- 4) the health insurance company and the performer of the mandatory health examinations;
- 5) service providers or organisers, for instance, to participate in a marathon, purchase sports club membership, educational institutions, etc;
- 6) photographers taking photos/shooting videos during events;
- 7) business trips related to the performance of official duties (plane tickets, hotels);
- 8) external training providers (if certificates containing personal data are issued after training);
- 9) producers of business cards;
- 10) sworn notaries for preparing powers of attorney for employees.

Categories of personal data processors may change from time to time, relevant amendments will be also implemented in this document thereof.

**9. Are your personal data transferred outside the European Union (EU) or the countries of the European Economic Area (EEA)?**

We do not transfer data to countries located outside the European Union or the European Economic Area.

**10. Are your personal data used for adoption of automated decisions?**

We do not use your data for adopting automated decisions.

**11. How long will we store your personal data?**

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Your personal data is stored for as long as its storage is required for the respective personal data processing purposes as well as under the requirements of the applicable legislation.

When assessing the personal data storage duration, we take into account the requirements of the applicable legislation, contractual obligation fulfilment aspects, your instructions (for instance, in the case of consent) as well as our legitimate interests. If your personal data is no longer required for the purposes specified, we will erase or destroy it.

For instance, we will store your CV and attached documents submitted for a particular vacant position for 3 (three) months following the end of the tender in order to secure defence against possible claims and litigations against us. However, if you have submitted CVs and enclosed documents without applying for a specific job vacancy or have given consent to the use of your CV and enclosed documents also for later personnel selections, we will store your CV and enclosed documents for 1 (one) year. You always have the right to withdraw your consent to the storage of such data.

The personal data processed based on your consent are stored during the validity of the consent to the particular purpose of personal data processing if there are no other basis for processing your personal data.

## 12. What are your, as the data subject, rights in relation to the processing of your personal data?

### Personal data updating

If there are changes in the personal data you have provided to us, for instance, changes in your contact address, telephone number or e-mail, we kindly ask to contact us and provide us with the up-to-date data so that we can meet the respective personal data processing purposes.

### Your right to access and rectify your personal data

In accordance with the provisions of the General Data Protection Regulation, you are entitled to access your personal data at our disposal, request its rectification, erasure, processing restriction, object to the processing of your data, and the right to data portability in the cases and under the procedure specified in the General Data Protection Regulation.

We respect your right to access your personal data and to control it, therefore, upon receipt of your request, we will reply to it within the terms defined by laws and regulations (usually, latest within one month, unless this is a special request where more time is needed for preparing a reply), and, if this is possible, we will update or erase your personal data accordingly.

You can obtain information about your personal data available to us or exercise your other rights as the data subject in one of the following ways:

- 1) by submitting the respective application in person and identifying yourself at our office at Grēcinieku iela 6, Riga, on business days from 09:30 to 17:00;
- 2) by sending the respective application to us by post to the following address: Kalēju iela 43, Riga, LV-1050;
- 3) by sending the respective application to our e-mail: [info@bib.eu](mailto:info@bib.eu), or: [dataprotection@bib.eu](mailto:dataprotection@bib.eu), preferably by signing with a secure electronic signature.

Upon receipt of your application, we will evaluate its content and your identifiability and, depending on the situation, reserve the possibility to ask you to additionally identify yourself to ensure the security of your data and disclosure to the respective person.

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**Withdrawal of the consent**

If your personal data processing of is based on your consent, you are entitled to withdraw it at any time, and we will not further process your personal data which we were processing based on your consent for that purpose. However, please be advised that the withdrawal of consent cannot affect the processing of personal data that is required to fulfil the statutory requirements or is based on a contract, our legitimate interests or other basis specified in the regulatory enactments for the lawful processing of data.

You may also object to the processing of your personal data if personal data processing is based on legitimate interests.

**13. Where can you file a complaint with regard to the issues related to personal data processing?**

If you have any questions or objections with regard to the processing of your personal data by us, we encourage you to, first of all, contact us.

However, if you still believe that we were not able to resolve the issue and you believe that we are still violating your right to the protection of personal data, you are entitled to file a complaint with the State Data Inspectorate. Sample applications for the State Data Inspectorate and other related information may be found on the State Data Inspectorate's website (<http://www.dvi.gov.lv/lv/datu-aizsardziba/privatpersonam/iesniegumu-paraugi/>).

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