

# AB ORLEN LIETUVA JOB APPLICANTS' PERSONAL DATA PRIVACY POLICY

Please read this Privacy Policy carefully as it contains important information

Latest revision 29 March 2023

This Job Applicants' Personal Data Privacy Policy (the Policy) provides detailed information on processing by AB ORLEN Lietuva (the Company, or 'we', or 'us') of personal data provided by job applicants, and helps in understanding what personal data we collect and how we use and store (retain) it, etc.

Please note that we may amend and change this Policy from time to time to keep it updated. The version of the Policy being in force at the relevant time is posted on our Website at <https://www.orlenlietuva.lt/EN/Company/Pages/Career.aspx>

## 1. What Personal Data We Collect and Why?

Personal data means any information which can be used to identify an individual, or any information on a person already identified.

### 1.1. Selection and Candidate Screening Processes

We collect and process the following data during the job candidates' selection and screening processes.

<b>General Information</b>	full name, date of birth, address of permanent residence, e-mail address, mailing address and/or phone number, information on professional experience (former employers, period of employment, job position, duties and/or achievements), information on education (educational institution, learning period, completed level of education (degree) and/or qualification), information on further trainings (training courses attended, certificates acquired), information on language proficiency, IT skills, driving skills, other competences, as well as any other information provided in CV, a letter of motivation or other application documents.
<b>Recommendations, employers' feedback</b>	a person who gives a recommendation or feedback, his/her contact information, contents of recommendation.
<b>Candidate screening information</b>	Full name, qualification, education, summary of the interview with the candidate, insights and opinions of the persons conducting the selection, results of testing of the candidate. This information may be stored for up to 2 years for protection and submission to the competent authorities in the event of a claim by the candidate.
<b>Special categories of personal data<sup>1</sup></b>	information on physical or mental health or condition, convictions of intentional offences not set aside

<sup>1</sup> Special categories of personal data are collected and processed only if and to the extent required for selection to a specific vacancy in so far as permitted by the applicable legislation. Data on your health will be collected and processed in accordance with the applicable legislation to assess your working capacity, suitability of a particular workplace for your health condition, and/or your capacity to work under occupational risk conditions. In any case, such special categories of personal data will be collected and processed during the final selection stages.

<b>Legal Grounds for Processing of Personal Data</b>	Your consent to the processing which may be withdrawn at any time GDPR Art. 6 (1) a.
<b>Period of Data Processing</b>	For the period of selection for a particular vacancy, up to a total of no more than 6 months for selected vacancy position.

Your consent for processing of the data provided in CV, applicant' questionnaire and other application documents (resume, a letter of motivation, etc.) shall be deemed to have been received when your CV, applicant' questionnaire and/or other documents are submitted.

In case any data on a candidate as well as CVs or other application documents are obtained from the Lithuanian Public Employment Service under the Ministry of Social Security and Labour, online job portals, social media platforms for professionals (e.g. LinkedIn) and/or other entities providing job search, recruitment and/or employment mediation services it shall be presumed that you have received all necessary information on processing of your personal data and gave your consent to such entities for the processing, whereas such consent shall also include the right for the said entities to provide your personal data to potential employers (including the Company) and shall entitle such potential employers to process your personal data for selection and job screening purposes.

Personal data from other sources will be collected only subject to your separate consent. For example, the recommendations you provide will be verified or feedback from your former employers will be requested only subject to your consent for addressing the person you indicated.

Where, on completion of a selection procedure, your candidature is not accepted and no employment contract is concluded, all personal data collected for the selection purposes will be securely destroyed, unless your consent is received for entering your data in the Company's database of applicants as described in Section 1.2 below.

## 1.2. Applicants' Database Administration

Subject to your request for being entered into our applicants' database and receiving information on job vacancies in our company or companies of ORLEN Lietuva Group, the following personal data will be processed in our applicants' database.

<b>General Information</b>	full name, date of birth, address of permanent residence, e-mail address, mailing address and/or phone number, information on professional experience (former employers, period of employment, job position, duties and/or achievements), information on education (educational institution, learning period, completed level of education (degree) and/or qualification), information on further trainings (training courses attended, certificates acquired), information on language proficiency, IT skills, driving skills, other competences, as well as any other information provided in CV, a letter of motivation or other application documents.
<b>Recommendations, employers' feedback</b>	a person who gives a recommendation or feedback, his/her contact information, contents of recommendation
<b>Candidate screening information</b>	Full name, qualification, education, summary of the interview with the candidate, insights and opinions of the persons conducting the selection, results of testing of the candidate. This information may be stored for up to 2 years for protection and submission to the competent authorities in the event of a claim by the candidate.

<b>Legal Grounds for Processing of Personal Data</b>	Your consent to the processing which may be withdrawn at any time GDPR Art. 6 (1) a.
<b>Period of Data Processing</b>	1 (one) year after the end of the selection calendar year.

You are free to object to entering of your personal data into our applicants' database and its further processing as well as withdraw your consent at any time and request removal of your personal data from our applicants' database. Such objection to entering your personal data into our applicants' database or withdrawal of the consent for personal data processing will not be prejudicial to your participation in the procedure of selection to a particular vacancy you are applying for.

## **2. From what Sources do we obtain your Personal Data?**

Usually this is the data that you provide to us directly while responding to our job advertisement by submitting your CV, applicant' questionnaire and/or other application documents (resume, a letter of motivation, etc.).

Information on your candidacy, your CV and other application documents may also be obtained from entities providing job search, recruitment and/or employment mediation services, e.g. Lithuanian Public Employment Service under the Ministry of Social Security and Labour, employment agencies, online job portals, social media platforms for professionals (e.g. LinkedIn).

Certain information may also be obtained from third parties, e.g. recommending individuals, present or former employers. However, such information will be collected only subject to your consent for addressing a particular person you indicated.

## **3. Retention of Data for a Longer Period**

On expiry of the data processing and retention period set forth herein (i.e. at the end of selection procedure or one year following the end of selection procedure, subject to your consent) or after receipt of your request, your personal data will be destroyed, whereas in the cases established herein, such data will be anonymized reliably and irretrievably as soon as possible within a reasonable time required for such actions.

Retention of your personal data for a period longer than set forth herein can only take place in the following cases:

- where there is a reasonable suspicion of an infringement which is subject to a relevant investigation;
- where processing of your data is necessary for proper dispute, claim settlement;
- on other grounds provided for in the applicable legislation.

In any case, your consent and the related evidence thereof may be retained for a longer period to the extent necessary to defend ourselves against any claims or actions.

## **4. Handling Third Party Requests for Personal Data**

We may engage third parties to process your personal data and assist us in the candidate selection and screening procedure or provide the services of candidate selection, screening and internal administration. Such parties may include entities providing personnel selection and screening services, database software suppliers, suppliers of database administration services, suppliers of data centre operation, hosting and Cloud services, etc. In each case, the data provided to a particular processor is limited to the extent strictly necessary and proportionate for executing a particular assignment or delivery of a particular service. Third parties that we engage to process your personal

data may do so only in accordance with our instructions, and may not use such data for other purposes or transfer to other persons without our consent. Furthermore, they are obliged to take appropriate measures to guarantee the confidentiality and security of your personal data as required by the applicable legislation and written agreements concluded with us.

In some cases, when you are applying for a particular vacancy (usually senior positions such as board members, directors), data on your candidacy and your personal data may be provided to our parent entity which, in accordance with the procedures applicable in our Capital Group, may engage in the process of screening and career related decision-making.

The candidates applying for the position included in the list of positions issued by order of the Minister of Energy of the Republic of Lithuania<sup>2</sup> will be subject to verification of their compliance with the established criteria to hold the relevant position. Thus, the Company will transfer personal data (name, surname, date of birth) of the candidate to the relevant state authorities that will assess eligibility of the candidate for a specific position. Personal data of the candidates will be processed on the basis of compliance with a legal obligation (GDPR Art. 6(1)(c)).

Data may also be submitted to the competent public or law enforcement authorities, e.g., police, law enforcement or supervisory authorities; however, only subject to their relevant request and exclusively in the cases required by the effective legislation or in the cases and following the procedure established by the applicable legislation for safeguarding our rights, ensuring security of our customers, employees and resources as well as for the establishment, exercise or defence of legal claims.

## **5. Territorial Scope of Personal Data Processing**

Processing of your personal data is limited to the territory of the European Union. We have no intention of transferring and do not transfer your personal data to processors or recipients from any third country.

## **6. Your Rights Exercised within the Framework of Data Protection Laws**

Right of access to your personal data processed by us: you have the right to obtain confirmation as to whether or not your personal data are being processed, and the right of access to the personal data we process as well as obtain the information on the purposes of the processing, the categories of personal data concerned, categories of data recipients, the period for which the personal data will be processed, and information as to the data sources.

Right to rectification: In case of any changes in the data provided in your application documents or in case you consider that the information we process is inaccurate or incomplete, you have the right to obtain its rectification, modification or supplementing.

Right to object: You have the right to object at any time to processing of your personal data and request for ceasing further processing exercised on the basis of your consent.

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<sup>2</sup> Order of the Minister of Energy of the Republic of Lithuania 'Regarding Amendment to the 30 January 2019 Order No. 1-33 'Regarding the List of Positions Held by the Persons Employed in the Enterprises and Facilities of Importance to National Security, and/or Persons Working with Infrastructure of Strategic Importance or Significance (including members of collegial supervisory bodies, governing bodies and single-person management bodies in the enterprises of importance to national security), as well as by the Persons who, by Virtue of the Functions Assigned, would be Entitled to Unescorted Access to the Infrastructure of Such Enterprises, or Entitled to Take Decisions on the Functioning of Such Infrastructure, with those Persons Holding the Position Included in the List being Subject to Verification of Their Compliance with the Established Criteria'. Refer to: <[1-179 Dėl Lietuvos Respublikos energetikos ministro 2019 m. sausio 30 d. įsakymo Nr. 1-33 „Dėl Energeti... \(e-tar.lt\)>](#).

Right to lodge a complaint: If you consider that processing of your personal data is carried out in breach of the requirements established by the applicable data protection legislation, please approach us directly first.

Responsibility for the protection of personal data in the Company is set on Data Protection Office who may be contacted by e-mail [dap@orlenlietuva.lt](mailto:dap@orlenlietuva.lt)

If you are not satisfied with the suggested way of the problem solving or consider that no actions will be taken to handle your request, you have the right to make a complaint after 30 days to the State Data Protection Inspectorate (A. Juozapavičiaus str. 6, 09310 Vilnius; tel. (8 5) 271 2804, 279 1445; e-mail: [ada@ada.lt](mailto:ada@ada.lt)).

Right to erasure ('right to be forgotten'): Under certain circumstances defined by the applicable data protection legislation (personal data unlawfully processed, personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, etc.), you shall have the right to obtain the erasure of your personal data.

Right to restriction of processing: In certain circumstances defined by the applicable data protection legislation (the personal data unlawfully processed, you contest the accuracy of the personal data, you have objected to processing on our legitimate grounds, etc.), you shall have the right to obtain restriction of the processing.

Right to data portability: You have the right to transmit the data processed by automated means (applicable exclusively to the data processed in the applicants' database) to another controller. Your data will be provided in a structured, commonly used and machine-readable format and may be transmitted directly to another controller, if so requested and technically feasible.

## 7. Consideration of Requests

Upon receipt of your request for access to data or for exercise of other rights, your identity will be verified in order to protect personal data of all applicants against unauthorized disclosure. For this purpose you may be asked for presenting a personal identification document.

Upon receipt of your request and subsequent proper identification, we will respond without undue delay, at the latest within one month, by providing details of actions undertaken pursuant to your request. In view of the complexity and number of the requests, the period of one month may be extended by two further months, notifying you of any such extension by the end of the first month, together with the reasons for the delay.

If your request is made in electronic form, the information will be provided by electronic means, unless otherwise requested or not possible (e.g. extremely large scope of information).

We have the right to refuse acting on the request by written indication of the reasons for such refusal where the relevant circumstances set forth in the applicable legislation are established.

## 8. Contact Information

All matters concerning the processing of personal data may be referred to:

<b>Data Protection Officer</b>	E-mail: <a href="mailto:dap@orlenlietuva.lt">dap@orlenlietuva.lt</a> Mailing address: Mažeikių str. 75, Juodeikiai Village, 89453, Mažeikiai Distr. Municipality
<b>Data Controller</b>	Public Company ORLEN Lietuva Mažeikių str. 75, Juodeikiai Village, 89453, Mažeikiai Distr. Municipality Code: 166451720

	VAT number: LT664517219 Account No. LT247044060000004128 AB SEB Bank
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## **9. How we protect your Personal Information**

The processing of your personal data to protect it against any unauthorized access, use or disclosure is done in line with the latest technological standards and procedures. The Company's information security management system complies with the ISO / IEC 27001: 2013 standard. This standard confirms that we make every effort to create security barriers to protect information. Data processing agreements are signed with Data Processors, which contain obligations for them to comply with all possible security measures and legal requirements to ensure the protection of personal data. Confidentiality agreements / confidentiality obligations have been concluded with the employees of the Company, where sanctions are provided for illegal disclosure of personal data and information.