



NAGA MARKETS LTD

CAREER APPLICATION PRIVACY POLICY

NAGA Markets Ltd, a company registered in the Republic of Cyprus with Registration Number: HE 251168 located at Ariadnis 7, Mouttayaika 4531, Limassol, Cyprus (hereafter referred to as the “**Company**”). The Company is regulated and licenced by the Cyprus Securities and Exchange Commission (hereafter referred to as “**CySEC**”) with license number: 204/13).

This is the Company’s Career Application Privacy Policy (hereafter referred to as the “**Policy**”) which states how we collect, use and process your personal data in accordance with the provisions of the EU General Data Protection Regulation 2016/679 (hereafter referred to as “**GDPR**”). The Company is the “**data controller**” in this situation and we have a legal obligation to inform people who apply for a work with NAGA how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

The Company upholds the key principles of GDPR, and we will only use your personal data lawfully, fairly, in a transparent way, only for valid purposes and with explanation where available. Moreover, we will collect personal data, which is relevant, limited and only use them when accurate and up to date while we always keep your personal information secured.

Although you are under no statutory or contractual obligation to provide us with your personal data during the recruitment process, they are necessary in order to process your application on a fair, transparent, and correct manner.

WHAT PERSONAL DATA WE COLLECT AND STORE?

The Company collects a range of information about you in a variety of ways such as part of an application form or resume. This included when these documents are sent to us as part of speculative applications and queries, obtained from your identification documents, or collected through interviews or other methods of assessment. We may also collect personal data about you from third



parties, such as references supplied by former employers where you provide us with their contact details.

Finally, the Company may collect, store, and use the following “**special categories**” of more sensitive personal information such as about your criminal convictions and offences. Indeed, we are required to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. As a regulated entity, we are required by Cyprus Securities and Exchange Commission (“CySEC”) to carry out criminal record checks for our potential employees.

Specifically, the Company will collect personal data which include the following:

- your name, address, and contact details, including email address and telephone number; and
- details of your qualifications, skills, experience, and employment history; and
- information from interviews and phone-screenings you may have; and
- information about your current level of remuneration, including benefits and entitlements; and
- information about your entitlement to work in Cyprus; and
- equal opportunities monitoring information, including information about your ethnic origin.

LAWFUL PROCESSING PERSONAL DATA

Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate’s suitability for employment and decide to whom to offer a job. Therefore, in order to comply with the provisions of GDPR, the Company collects and processes your data for several legitimate reasons, mainly because:

- we have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process
- processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate’s suitability for employment and decide to whom to offer a job
- in some cases, we process data to ensure that we are complying with our legal and regulatory obligations as a regulated Cyprus Investment Firm (we are required to check an applicant’s suitability and eligibility to work in Cyprus)

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- where we process other special categories of data, such as information about ethnic origin and health, this is for equal opportunities monitoring purposes.

Our processing of these types of data will be carried out to ensure you or us can meet our obligations to exercise our rights under law related to employment or (only where applicable) to enable us to establish, exercise or defend legal claims. The Company under no circumstance will use your personal data for purposes other than the recruitment process of which you are part.

Once we receive your CV and covering letter, your application form and the results from the initial interview, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for a second interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role of the relevant position that you have applied for. If we decide to offer you the role, we will then take up references and/or carry out a criminal record and/or carry out any other check before confirming your appointment.

Should you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

AUTOMATED DECISION – MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

SHARING WITH YOUR PERSONAL DATA

The Company will share your personal data with:

- ✓ A third party that provides an Online Candidate Application System to assist with our recruitment process. The Company will use the third-party service provider to process personal information as a data processor on our behalf. The third-party service provider is only entitled to process your personal data in accordance with our instructions. Where you apply for a job opening posted by us, this Privacy Notice will apply to our processing of your personal information.

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- ✓ Internal third parties being other companies in the NAGA Group and other affiliated companies which are based in EU as well as in Non-EU countries, if you are applying for a role in a jurisdiction other than the one you are based in. We also share your personal information with our internal third parties in case they are looking for candidates with professional backgrounds similar to yours. Should you need further clarifications on this, please contact our HR department at: lisa@nagamarkets.com

All our third-party service providers and other entities in the group and affiliated companies are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

DATA SECURITY

The Company takes your privacy very seriously and for that reason we have adopted appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality and relevant Data Processing or Joint Controller Agreements have been signed. Details of these measures may be obtained from the Data Protection officer of the Company at dpo@nagamarkets.com.

Finally, the Company has appropriate procedures in place, in order to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

RETENTION OF PERSONAL DATA

The Company will retain your personal information for a period of 1 year after we have communicated to you our decision about whether to appoint you to the relevant position. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment

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exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy which can be provided to you upon your request.

Please note that, where there is any activity on a candidate's profile in the last 6 months, like comments, emails or evaluations of your personal information, the retention period will be commencing from the date of the latest activity. If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

YOUR RIGHTS AS DATA SUBJECT

Under the GDPR, you have the following principal rights in connection to your personal information:

- ✓ Right to access
- ✓ Right to rectification
- ✓ Right to deletion
- ✓ Right to restrict its processing
- ✓ Right to data portability
- ✓ Right to complaint to a supervisory authority
- ✓ Right to withdraw consent.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us at: dpo@nagamarkets.com.

WITHDRAW CONSENT

When you applied for a position at NAGA, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the us at lisa@nagamarkets.com. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

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RESPONSIBILITY AND COMPLIANCE

The Company's DPO is responsible to oversee compliance with this Policy, therefore, if you have any questions about this privacy notice or how we handle your personal information, please contact us at dpo@nagamarkets.com. You have the right to make a complaint at any time to the Commissioner of Personal Data Office (CPD), the Cyprus supervisory authority for data protection issues.