

1 | INTRODUCTION

NAGA Markets Limited (referred to as “NAGA”), collect and process personal data relating to job applicants as part of our recruitment process. We are committed to being transparent and how we collect and use that data and to meeting our data protection obligations.

You are under no statutory or contractual obligation to provide data to NAGA during the recruitment process. However, if you do not provide the information, we may not be able to process your application.

2 | PERSONAL DATA WE COLLECT AND STORE

NAGA collects a range of information about you, including the following:

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

We may collect this information in a variety of ways. For example, data might be contained in application forms or resumes (including when these 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.

Data will be stored in a range of different places, including on your application record, in our HR management systems and our email systems.

3 | PURPOSES OF 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. In order to comply with Data Protection Laws, NAGA needs a lawful basis for your personal data.

4 | LEGAL BASIS FOR PROCESSING PERSONAL DATA

NAGA collects and processes your data for a number of legitimate reasons, as follows:

- 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. For example, as a Cypriot Investment Firm, we are required to check an applicant's suitability and eligibility to work in Cyprus;
- 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.

NAGA will never use your personal data for purposes other than the recruitment process of which you are part.

5 | DISCLOSURE OF PERSONAL DATA

Your information may be shared internally with NAGA for the purposes of the recruitment process. This includes members of the HR team, interviewers involved in the recruitment process, and managers in the business area with a vacancy.

NAGA will not share your data with third parties, unless your application for employment is successful and an offer of employment is made. We will then share your data with former employers in order to obtain references. We may also share your data with our group companies, for business performance and other types of monitoring and management purposes and, if you are applying for a senior management position with us, we may share your data with our investors.

In addition, we will share your personal data with competent authorities or otherwise to comply with applicable laws and regulations.

6 | SAFEGUARDING OF PERSONAL DATA

NAGA takes the security of your data very seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our personnel in the proper performance of their duties.

7 | RETENTION OF PERSONAL DATA

If your application for employment is unsuccessful, we will hold your data on file for 1 year after the end of the relevant recruitment process. At the end of the period, or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personal file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

8 | YOUR RIGHTS TO YOUR PERSONAL DATA

Under the Data Protection Laws, you have the following principal rights:

- 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 are unhappy with the way we have handled your personal data or any other privacy query or request that you have raised with us, you have a right to complain to the Office of the Commissioner for Personal Data Protection in Cyprus. If you would like to be directed to the Office of the Commissioner, please contact us at compliance@naga.com.

9 | REVIEW OF THIS POLICY

We may update this policy from time to time to respond to updates in legal, technical, or business requirements and developments. We will take appropriate measures to inform you of any changes implemented.