

Privacy Notice for Candidate

1. **The controller** of your personal data is PRA Group Europe Holding I S.à r.l., 53 Boulevard Royal | L-2449 Luxembourg (hereinafter “we” “our” and “us”)
2. **Contact point** for data protection matters:
 - a) e-mail: hr-dataprotection@pragroup.eu
 - b) post: 53 Boulevard Royal | L-2449 Luxembourg
3. **Purpose** of processing personal data and **legal basis**:

Application: activities carried out in the course of receiving and assessing applications, including reviewing general applications or applications for specific jobs which may be received directly from you or via a recruitment agency. This may involve the processing of your CV, name, address, employment history, academic and professional qualifications, age and nationality.

Article 6(1)(a) of the GDPR we process your application on the basis of a consent provided to us when applying for a position;

Assessment: activities carried out in the course of the recruitment process to ensure your suitability for roles at PRA Group Europe Holding I S.à r.l., which may involve the processing of your CV, assessment centre interviews (such as a role play, group exercise or presentation), interview (face to face, telephone or video), technical assessments or other appropriate tests for the role, shortlisting the candidates;

Article 6(1)(f) of the GDPR on the basis of our legitimate interest as your potential employer;

Defend our interest: after the end of the recruitment process, we will process your data in order to defend against claims that result from the recruitment process.

Article 6(1)(f) of the GDPR on the basis of our legitimate interest as your potential employer;

Future recruitment: If you agree to the storage of your data after the recruitment process in which you participated, we may retain your application for future recruitments that we may carry out.

Article 6(1)(a) of the GDPR on the basis of your consent.

If you are **the successful candidate** (we have offered you to conclude an employment contract) additionally we will process your data in purposes set out below.

Pre-contractual process: we will process your personal data prior to entering an employment contract in order to prepare Your contract and the measures necessary for you to start performing your employment duties

Article 6(1)(b) and (f) of the GDPR on the basis of pre-contractual processing, legal obligation and our legitimate interest, as your future employer

Pre-employment screening (PES): pre-employment screening activities carried out in-house or third party provider for the purposes of identity verification, education qualifications checks, employment checks, credit history and criminal records check. In some cases we will seek information from third parties, such as references from former employers.

Article 6(1)(a) of the GDPR on the basis of your consent

Verification of sanctions lists (including OFAC). We check whether your data is on sanctions lists, including lists maintained by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC). If your data appears on the OFAC sanction lists, we will share this information with PRA Group, Inc., which will mean the transfer of your data to the USA (for more information about data transfers, read section 4 of data recipients).

Article 6(1)(f) of the GDPR on the basis of our legitimate interest, which is to implement internal group policies

4. Source of data

If you did not send us your application directly, we have obtained your data included in your CV, job application and other data you may have provided from the recruitment agency or from the person that have recommended you in the referral program. We may also obtain your personal data during the pre-employment screening from our service provider.

5. Data recipients and data transfer

- a) For the abovementioned purpose(s) we can disclose your data to the following recipients: (i) to any of our related affiliates within the PRA Group of companies; (ii) recruitment and other third party agencies; (iii) vendors that provide us with services, such as IT service providers or HR system provider;
- b) Your personal data may be **transferred to a recipient in a third country**¹ for example, in connection with the use of a foreign IT subcontractor or in connection with the provision of intra-group services. Additionally, if your data appears on the OFAC sanction lists, we will share this information with PRA Group, Inc., which will mean the transfer of your data to the USA;

¹ A third country is a country located outside the European Economic Area (“EEA”). The EEA includes the Member States of the European Union, Iceland, Liechtenstein and Norway.

- c) **The basis for the transfer** of your personal data may be a decision of the European Commission stating the appropriate level of protection or standard data protection clauses. You have the right to obtain from us copy of the standard contractual clauses and information on the scope of the personal data that has been transferred.

6. **Data Storage**

Your personal data is stored for the duration of the recruitment activity and after its completion:

- a) for unsuccessful candidates personal data will be kept for a period necessary to defend our interests but for no longer than 12 months;
- b) for unsuccessful candidates who have given us additional consent to process their data for the future recruitments data will be kept for no longer than 12 months;
- c) if the candidate is successful, the documents will be transferred to the employee staff file and the applicable legal timeframes will be applicable.

7. **Your Rights**

We also would like to inform you that you have the following **rights**:

- a) Right to access to your personal data - Article 15 of the GDPR;
 - b) Right to rectify your personal data - Article 16 of the GDPR;
 - c) Right to erasure (right to be forgotten) - Article 17 of the GDPR
 - d) Right to restriction of processing - Article 18 of the GDPR
 - e) Right to data portability - Article 20 of the GDPR
 - f) Right to object to processing - Article 21 of the GDPR
 - g) Right to not to be subject to a decision based solely on automated processing including profiling – Article 22 of the GDPR
 - h) Right to lodge a complaint to a competent supervisory authority, if you believe that the processing of your personal data is unlawful.
- The competent supervisory authority's name is: National Commission for Data Protection.

8. **Right to withdraw a consent**

Where the processing of your personal data is based on consent given to us for one or more specific purposes, you may withdraw your consent at any time. We would like to inform you that withdrawal of the consent does not affect the lawfulness of the processing before its withdrawal. If you wish to withdraw your consent, please contact us. You can find our contact details in point 2.

9. **Automated decision – making**

We are not making automated decision based on your personal data.

10. **Requirement to provide data**

Providing data in the recruitment process is voluntary, but it is necessary to participate in the recruitment process. Failure to provide required personal data may mean that we will not be able to consider your application. Providing data for the purpose of concluding a contract with the selected candidate is a necessary condition for conclusion of an employment contract. Failure to provide data will prevent the conclusion of the contract.