



Hostopia Job Applicants Privacy/Data Protection Notice

Introduction

1. This notice explains what personal data (information) the Deluxe Corporation business Hostopia Bulgaria EOOD (“**Hostopia**”, or “**we**”) will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a “privacy notice”) and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

2. Hostopia, with seat and registered office at 127B, Tsarigradsko Shose Blvd, building 2, floor 6, registered with the Bulgarian Trade Registry under Company registration No. 200761672, is a “data controller” and gathers and uses certain information about you.
3. *[This information is also used by our affiliated entities and group companies, namely {insert details or a link, or otherwise show where details of group companies can be obtained} (our “group companies”) and so, in this notice, references to “we” or “us” mean the Company and our group companies.]*

Data protection principles

4. We will comply with the data protection principles when gathering and using personal information, as set out in our Employee (Internal) Data Protection Policy.

What information

5. We may collect the following information up to and including the shortlisting stage of the recruitment process:
 - Your name and contact details (i.e. address, home and mobile phone numbers, email address);
 - Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests; and
 - Details of your referees.

We may collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;

PLEASE NOTE: Please note that we will not contact directly your referees, unless you explicitly consent to such approach by completing our designated consent-form.

- Information regarding your academic and professional qualifications;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information (if applicable, e.g. work permits, residence permit etc.);
- Information relating to your health, only when required under law for the position you apply for.

Failure to provide the above categories of personal data may lead to impossibility for Hostopia to make a final decision to recruit or enter into employment relationship with you. Where this is the case, we will notify you in advance of the consequences from your refusal to provide us with the relevant personal data.

How we collect the information

6. We may collect this information from you, your referees (details of whom you will have provided) and/or your education provider.

Why and on what legal ground we collect the information and how we use it

7. We will typically collect and use this information for the following purposes:
 - Assessing your skills, qualifications and interests against our career opportunities, maintaining our relationship with you during the recruitment process, including by calling you and inviting you to interviews, exchange of offers and terms of employment, etc.;
 - Verifying your information, running our internal compliance and conflict checks and to conduct reference checks (if required under law or subject to your explicit consent);
 - Compliance with our legal, regulatory and corporate governance obligations and good practice;
 - Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests;
 - Administration;
 - Marketing our business and business development; and
 - Improving our recruitment process.

8. We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it. If in the future, we would need to process your personal data for a purpose other than the above we will provide you with information on that purpose and any other relevant information. Where necessary, we will seek for your consent before processing your Personal Data for other purpose.

9. In order to be able to process your personal data in our recruitment campaigns, we rely on the following legal basis:
 - taking steps to enter into a contract;
 - compliance with a legal obligation
 - our legitimate interests or those of a relevant third party, but only if these are not overridden by your interests, rights or freedoms, including to establish, exercise and/or defend any legal claims that may be brought by or against us in connection with your recruitment;
 - the necessity for carrying out obligations or exercising rights in employment law;

How we may share information

10. We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information as required to comply with the law.

Sensitive personal information

11. We do not request special categories of personal data (sensitive data) about you which includes details about your race or ethnicity, philosophical beliefs, sex life, sexual orientation, political opinions, information about health and genetic and biometric data. Please do not include such data in your application.
12. In very limited occasions, we may request you to provide data regarding your health but only where this is explicitly required under law for the particular position you apply to.

Transferring data internationally

13. We may need to transfer your personal data to the United States, located outside the *European Economic Area* for the purpose of human resources and employee benefits. Any transfer of your data will be subject to an EU approved mechanism, including standard contractual clauses, that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

Where information may be held

14. Information may be held at our offices and those of our group companies, and third-party agencies, service providers, representatives and agents as described above.

How long we keep your information

15. We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.
16. We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the statutory retention periods and the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.
17. If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.
18. Further details on our approach to information retention are available in our Employee (Internal) Privacy/Data Protection Policy. We may provide these details upon request from you.

Your right to object to us processing your information

19. Where our processing of your information is based solely on our legitimate interests (or those of a third party), you have the right to object to that processing if you give us specific reasons why you are objecting, which are based on your particular situation. If you object, we can no longer process your information unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
20. Please contact our Privacy Officer, who can be contacted at PrivacyProgramOffice@deluxe.com if you wish to object in this way.

Your rights to correct and access your information and to ask for it to be erased

21. Please contact our Privacy Officer, who can be contacted at PrivacyProgramOffice@deluxe.com if you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our Privacy Officer for some but not all of the information we hold and process to be erased (the “right to be forgotten”) in certain circumstances. Our Privacy Officer will provide you with further information about the right to be forgotten, if you ask for it.

Keeping your personal information secure

22. We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.
23. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

24. We hope that our Privacy Officer, who you may contact at PrivacyProgramOffice@deluxe.com, can resolve any query or concern you raise about our use of your information. If not, you have right to lodge a formal complaint with the Bulgarian Commission on Personal Data Protection at kzld@cpdp.bg, 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592. Further information about your rights and how to make a formal complaint may be accessed on the complaint section of the CPDP's website: <https://www.cpdp.bg/en/index.php?p=pages&aid=6>.