

# Candidate Data Protection Policy

## Who is responsible for processing your data?

- Company Name: CIVITATIS TOURS, S.L. (CIVITATIS)
- NIF: B-86899440
- Address: Calle Coloreros 2, 28013, Madrid, Spain.
- Email: [dpo@civitatis.com](mailto:dpo@civitatis.com)

## Who is the CIVITATIS Data Protection Officer (DPO) and how can they assist you?

The DPO is a legally mandated role tasked with advising and informing the entity on data protection obligations and monitoring compliance. The DPO also serves as the contact point for any data protection issues, and you can reach them at [dpo@civitatis.com](mailto:dpo@civitatis.com)

## What is the purpose of processing your personal data?

We process the personal data you provide to conduct CIVITATIS's personnel selection processes.

To verify the accuracy of information provided by candidates, references from previous employers may be requested, such as recommendation letters. CIVITATIS may also contact these employers to verify the authenticity of the information provided.

Providing your data is necessary to participate in our selection processes.

## How long will we keep your data?

Data provided or obtained to participate in a specific recruitment process will be retained until the conclusion of that process and then deleted unless you are selected, in which case it will be added to your employee file. If unsuccessful candidates wish us to retain their data for future selection processes, they must expressly request this. In such cases, data will be retained for a maximum of two years from the last update.

Data spontaneously communicated by email will also be retained for two years from the last update or user interaction if you subscribe to job offers from CIVITATIS via the Employment Portal.

You must keep your personal data, especially related to training and professional experience, up-to-date.

## What is the legal basis for processing your data?

The legal basis for processing CVs and other documents for a specific open recruitment process is the existence of a pre-contractual relationship. Additional data may be collected during interviews or selection processes based on the same legal foundation.

Notwithstanding the foregoing, the legal basis for the processing of data provided during the recruitment process, when you have asked us to keep it after the end of the process, is your consent, which may be revoked at any time. However, data processing carried out previously will not lose its lawfulness because the consent has been revoked.

Furthermore, the legal basis for processing data to verify information provided to CIVITATIS is legitimate interest, which is considered prevalent under the following rationale:

- CIVITATIS has a legitimate interest in verifying whether candidates possess the claimed prior experience for the specific role they would perform.
- This is a suitable means to demonstrate or verify such experience, and CIVITATIS will only process information from relevant previous occupations.
- Information will only be requested from previous employers if it directly pertains to the provided information.

### **To whom will your data be disclosed?**

Your data will be treated confidentially and not disclosed to any external third parties.

### **Are there international data transfers?**

CIVITATIS uses “cloud computing” for data storage through Google Drive, with data stored in the USA under the Data Privacy Framework - Information available at:

<https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt00000001L5AAI&status=Active>

### **What are your rights when you provide us with your data?**

You have the right to confirm whether we are processing your personal data and to access your personal data, request correction of inaccurate data, or request its deletion when the data is no longer necessary for the purposes collected.

Under conditions provided in the General Data Protection Regulation, you may request the restriction of processing or portability of your data, in which case we will only retain it for the assertion or defense of claims.

In certain circumstances and for reasons related to your particular situation, you may object to the processing of your data. If you have consented to processing for specific purposes, you are entitled to withdraw consent at any time, without affecting the legality of processing based on consent before its withdrawal. In these cases, we will stop processing the data or, if applicable, stop doing so for that specific purpose, except for compelling legitimate reasons, or the assertion or defense of possible claims.

Additionally, data protection regulations allow you to object to being the subject of decisions based solely on the automated processing of your data, where applicable.

These rights are characterized as follows:

- They are exercised free of charge, unless the requests are manifestly unfounded or excessive (e.g., repetitive), in which case a fee proportional to the administrative costs incurred may be charged, or the request may be refused.
- You can exercise these rights directly or through a legal or voluntary representative.
- We must respond to your request within one month, but this period may be extended by two more months if necessary, considering the complexity and number of requests.
- We are obligated to inform you about the means to exercise these rights, which must be accessible and cannot deny you the right for the sole reason of choosing another method. If the request is made by electronic means, the information will be provided by these means when possible, unless you request otherwise.
- If for any reason, your request is not acted upon, we will inform you no later than one month after the reasons for this and the possibility of filing a complaint with a Supervisory Authority.

To facilitate the exercising of these rights, we have provided links below to the request form for each right:

- [Right of access form](#)
- [Right to rectification form](#)
- [Right to object form](#)
- [Right to erasure \("right to be forgotten"\) form](#)
- [Right to restriction of processing form](#)
- [Right to data portability form](#)
- [Right not to be subject to a decision based solely on automated processing form](#)

All the rights mentioned may be exercised via email at [dpo@civitatis.com](mailto:dpo@civitatis.com)

In the event of any violation of your rights, particularly if you have not received satisfaction in the exercising of your rights, you may file a complaint with the Spanish Data Protection Agency (contact details accessible at [www.aepd.es](http://www.aepd.es)), or with another competent supervisory authority. You can also obtain more information about the rights available to you by contacting these organizations.

### **How do we protect your personal data?**

We are firmly committed to protecting the personal data we process. We use reasonably reliable and effective physical, organizational, and technological measures, controls, and procedures aimed at preserving the integrity and security of your data and ensuring your privacy.

Additionally, all personnel with access to personal data have been trained and are aware of their obligations concerning the processing of personal data.

In the contracts we enter into with our service providers, we include clauses that require them to maintain confidentiality regarding the personal data to which they have access due to the engagement, as well as to implement the necessary technical and organizational

security measures to ensure the permanent confidentiality, integrity, availability, and resilience of personal data processing systems and services.

All these security measures are periodically reviewed to ensure their adequacy and effectiveness.

However, absolute security cannot be guaranteed, and no security system is impenetrable. Therefore, in the event that any information under our control is compromised as a result of a security breach, we will take appropriate measures to investigate the incident, notify the Supervisory Authority, and, if applicable, inform those users who may have been affected so they can take appropriate action.

### **What is your responsibility as the data subject?**

In this regard, the subject of the data is responsible for the accuracy of the data and must keep it properly updated to reflect their current situation, being liable for any false or inaccurate data they may provide, as well as for any direct or indirect damages that may result.

If you provide data regarding third parties, you assume the responsibility of informing them in advance of all provisions set forth in Article 14 of the General Data Protection Regulation under the conditions established in that provision.