

## **Candidate privacy policy**

Modus Mobility unites three brands: CityBee – one of the largest car sharing providers in Europe, MyBee – the only fully digital car subscription provider, and Mobility Fleet Solutions – a fleet management company of the above brands (further referred to as We, Modus Mobility) respect your privacy and are committed to protecting it by complying with this Candidate Policy.

Our personal data processing is subject to EU General Data Protection Regulation (GDPR) and applicable national laws.

In this Candidate Policy you will find information about the processing of your personal data. We are committed to being transparent by providing clear information about what personal data we process about you, the purposes of the processing, the retention periods of the personal data, as well as the legal basis for the processing and any other information that we are required to provide under applicable law.

Entities in Modus mobility are these:

- Citybee Solutions UAB, 302735731, Žalgirio str. 112-1, 09300 Vilnius, Lithuania
- Prime leasing UAB, 302565318, Žalgirio str. 112-1, 09300 Vilnius, Lithuania
- Miesto bitė UAB, 302793236, Žalgirio str. 112-1, 09300 Vilnius, Lithuania
- Mobility Fleet Solutions UAB, 302735731, Žalgirio str. 112-1, 09300 Vilnius, Lithuania
- Modus Mobility UAB, 302784358, Žalgirio str. 112-1, 09300 Vilnius, Lithuania
- Citybee Eesti Ou, 14646800, Parda tn 10 Kesklinna linnaosa, Tallinn Harju maakond 10151, Estonia
- Citybee Latvia Sia, 50203191721, Jūrmala, Piestātnes iela 11A, LV-2015, Latvia
- Mybee Estonia Ou, 16462004, Parda tn 10 Kesklinna linnaosa, Tallinn Harju maakond 10151, Estonia
- Mobility Fleet Solutions, s.r.o., 08805555, Počernická 272/96, Malešice, 108 00 Prague 10, Czech Republic
- Mobility Fleet Solutions, s.r.l., J23/1379/2020, 1A Drumul Garii Odai street, 3rd floor, room 315, entrance B, Otopeni, Ilfov county, Romania
- Mobility Fleet Solutions Sp. z o.o., 389358591, Ludwika Warynskiego 3a, Warszawa, Poland

### **1. What are the purposes of your data processing?**

We process your personal data for the purposes of administrating the recruitment process that includes inter alia a follow-up on your application, create a candidate profile and for communicating with you in an appropriate manner (e.g. inviting you to an interview), keep your CV and/ or share it with other interested and related companies (only with your separate consent).

### **2. What data do we process?**

In connection with your application and the recruitment process, we will collect, use and store the following persona data:

Name, surname, contact details (email, phone number), employment history, education history, languages, salary expectations, other skills relevant for the position you are applying for, results of tests and/ or practical tasks, attachments to the application (optional), URL link to social media accounts, photos (optional), application process data (e.g. number of applications, interview dates, notes, notifications), communication data (e. g. email address, email content), preferred work and/ or working hours.

In some cases, depending on the position you have applied for, we may ask you for additional information, e.g., about your driver's license, if you agree to work on shifts etc.

Submitting the application is voluntarily, however if you choose not to provide your personal data, you cannot participate in the recruitment process.

### **3. What are the purposes of your data processing?**

We process your personal data in the first instance on the basis of your expressed consent (Section 6 (1) (a) of the GDPR) for the purpose of assessing the suitability of your application, organizing the selection process and informing you about other recruitment opportunities.

You can withdraw your expressed consent at any time on the recruitment platform or by notifying Us separately in writing.

We may also process your personal data on the following grounds:

- the need to take certain measures before signing the employment contract on the basis of your application when you are selected (Section 6 (1) (b) of the GDPR);
- where We have a legitimate interest in assessing your suitability for the position you are seeking and to avoid any conflict of interest (Section 6 (1) (f) of the GDPR).
- Where we have a legitimate interest to reach you and offer you a suitable vacancies, when you publish your contacts publicly on LinkedIn platform (Section 6 (1) (f) of the GDPR).

### **4. How do we collect information about you?**

We may collect personal information about candidates from the following sources:

- You, the candidate. When you provide information as part of your application or during the recruitment process, e.g. when you apply for a specific position;
- The recruitment agency (if applicable for your application);
- Candidate's data is submitted by our current employee as a referee. In that case we are informing you about your personal information in the respect of the selection process;
- The data from third parties from a publicly accessible source: e.g., LinkedIn, CVbankas, CVonline or other business or employment-oriented services that operate via websites where you have added information about yourself; provided the link to LinkedIn URL profile or similar;
- Employment Service Under the Ministry of Social Security and Labor of the Republic of Lithuania.

### **5. How long do we process your data?**

The retention period of the data is no longer than 3 months after the vacancy that you have applied for is closed.

If you are not applying for the specific open vacancy, we will store your data for six months. If during this period we won't find any suitable position for you to offer, your resume will be permanently deleted.

In case you give your consent to participate in the future recruitment processes for a different vacancy, we will store your personal data for no longer than 18 months starting from the moment, when we receive the consent.

In cases when we are receiving information about you other than direct application, e.g. from a person who referred you, and you didn't provide consent within 30 days, after this period your personal data will be deleted.

## **6. How long do we process your data?**

We may disclose your personal data to our data processors, e.g. the service providers of IT maintenance services etc.

Because we use Workable candidate selection platform, to simplify the selection process, Workable Software Limited and its subcontractors may have access to candidates' personal data when providing their services. Workable act as our data processor.

We may transfer your personal data to the relevant public authorities entitled to check compliance only at their request and/or, if necessary, defend the legitimate interest of the company before the state or judicial authorities.

With your separate, expressed consent, we can share your data with other companies of Modus group.

## **7. How do we ensure the security of your data?**

We process your personal data responsibly and securely in accordance with our internal personal data policies and appropriate technical and organizational measures, including protection against unauthorized or unlawful processing of data and against accidental loss, destruction, damage, alteration, disclosure, or any other unlawful processing.

We follow the following basic principles of data processing:

- we collect personal data only for defined and legitimate purposes;
- we process personal data fairly and only for the original purpose;
- we store personal data for no longer than required by the established purposes or as required by legal acts;
- we assign the processing of personal data only to employees who have been granted such a right and official access;
- we disclose personal data to third parties only if there is a legal basis for it;
- We also have procedures in place to deal with any suspected data security breach.

The data that We collect from you and process using Workable's Services may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). In particular, your data may be accessible to i) Workable's staff in the USA or ii) may be stored by Workable's hosting service provider on servers in the USA as well as in the EU.

The USA does not have the same data protection laws as EEA. A Data Processor Agreement has been signed between Workable Software Limited and its overseas group companies, and between Workable Software Limited and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

## **8. What rights do you have?**

Under the General Data Protection Regulation you have a number of important rights free of charge. Those rights include:

- the right obtain from us confirmation as to whether or not we process your personal data and, where we do, access to the personal data;
- the right to request that we correct any inaccurate personal data;
- the right to the erasure of your personal data;
- the right to receive yourself or transfer your personal data to in certain circumstances (known as the right to data portability);
- in some circumstances you have the right to restrict the processing of your personal data;
- the right to object – you have the right to object to our processing. This applies when data processing is based on legitimate interests pursued by us or by a third party;
- the right to withdraw your consent to the processing at any time.

To carry out mentioned rights please provide written request to us or to Data protection officer with the contact information mentioned below.

You also have the right to make a complaint to the State data protection inspectorate (<http://www.vdai.lrv.lt>) if you believe that the processing of personal data by us does not comply with applicable legislation.

#### **9. How can you contact us?**

If you have questions about the processing of your personal data, requests or if you would like to give us feed-back, please contact:

JSC „Modus mobility“, 302784358, address: Žalgirio str. 112-1, 09300 Vilnius.

Data protection officer: [dpo@modusmobility.group](mailto:dpo@modusmobility.group)

#### **10. How often do we make review Candidate Policy?**

We keep our Candidate policy under regular review. This Candidate policy was last updated on 18th of May, 2023.