

Privacy Policy

KoronaPay Europe Limited

KoronaPay Europe Limited (“KoronaPay”) has adopted this privacy policy (the “policy”) to inform you about how we process personal data of our candidates who are in the European Union (“EU”) and/or European Economic Area (“EEA”) in the course of recruitment activities.

This policy is written in English and Russian language. In case of contradictions, the English text shall prevail.

1 Who we are

KoronaPay is the controller of the personal data we process.

We may process your personal data when you contact us in order to participate in recruitment activities.

Contact details

KoronaPay office is located in Cyprus. KoronaPay’s address and contact details are the following

- Phone and email: +357 25 328 288, info@koronapay.eu.
- Address: Georgiou A Street 89, MAIROZA YIATROS COURT, 3rd Floor, CY-4048 Limassol, Cyprus.

2 Purposes for personal data processing

This policy is layered. If you wish to learn about how we process personal data for a particular purpose, you can select and read the respective section of the policy.

We receive personal data from candidates directly and process their data to:

- Register for recruitment activities.

3 Who we work with

We may use third-party data processors to provide elements of services for us. We have contracts with the third parties in place. This means we are aware of all operations they perform with your personal data on behalf of us and instruct them on how to keep your personal data secure and on how long to store your data.

Below is an overview of the roles of the third parties we engage in personal data processing. Please refer to the [“Purposes for personal data processing”](#) section to find out under which circumstances we may share your personal data with third parties for specific purposes.

CJSC ZOLOTAYA KORONA

CJSC ZOLOTAYA KORONA (“Zolotaya Korona”) acts as a processor in the course of activities related to your personal data. Under our instructions, Zolotaya Korona provides us with HR service, including:

- register for recruitment activities by receiving and processing CV’s and application letters.

4 Description of data processing activities

Registering for recruitment activities

Data controller

KoronaPay acts as a controller for this processing activity.

Purpose and legal basis for processing

To become a new candidate of our vacancies, you must send us your CV and application letter by email on website koronapay.eu.

The legal basis for this is taking steps for entering into contract with KoronaPay, which refers to Article 6(1)(b) of the GDPR.

Personal data we collect

CV's and application letters:

- full name,
- phone number,
- citizenship,
- date of birth,
- address,
- email address.

Why we need your data

We identify you as a candidate receiving your personal data in CV and application letter for making a hiring decision.

How long we store your data

We retain your personal data for at least until the purpose of processing is achieved. (unless we are required to keep your data longer on other legal grounds (e.g. as part of an investigation)). In most cases it takes us up to 3 months to decide whether we are ready to employ you or not.

We erase your data when we reject your application or when you refuse to accept a job offer.

If we agree to sign the employment contract, we may keep the CV to facilitate an employment process. At the end of this period we will erase your data.

Sharing your data with third parties

We share your personal data with:

- Zolotaya Korona, which provides us with HR service.

5 Third-country processing

We engage companies located in Russia in the processing of your personal data. The entities are named in the section "[Who do we work with](#)" of the Policy.

We have safeguards in place with Russian companies. At the moment, the Commission of the European Union does not consider Russia as a country that ensures the adequate level of data protection due to the absence of the relevant decision.

To maintain your privacy, we have adopted standard data protection clauses approved by the European Commission in accordance with Article 46(2)(c) of the GDPR with Zolotaya Korona.

Standard data protection clauses form an agreement that contains the description of mutual data protection obligations of controllers and processors in relation to the processing of personal data.

If you need to obtain the copy of standard contractual clauses, please contact us using the contact details [above](#).

If your data have processing in EU and/or EEA countries, or countries, ensuring the adequate level of protection, no further safeguards are necessary in relation to the personal data transfers to such countries according to Article 45 of the GDPR.

If your data have processing in other countries not in the EU and/or EEA, we needed to share your data with such countries in order to fulfil the contract concluded with you.

Article 49(1) (b, c) of the GDPR provides us the legal bases for these transfers.

6 Your data protection rights

Right to access

You have the right to ask us whether we are processing your personal data and if so, to receive or get access to a copy of your data. This right is set by Article 15 of the GDPR.

Right to rectification

You have the right to correct any errors in your personal data and make the data complete if you believe it is incomplete. This right is set by Article 16 of the GDPR.

Right to erasure of personal data ('right to be forgotten')

You have the right to request us to delete your personal data. This right is set by Article 17 of the GDPR. Under the GDPR, we can fulfil this right if there is no compelling reason for its continued processing, in particular:

- We no longer need the data for the purposes for which they were initially collected or processed;
- You have withdrawn consent that you provided for processing your personal data, and we do not have any other legal grounds to process your personal data;
- You have exercised your right to object the processing of your data (according to Article 21(1) of the GDPR) and we are unable to demonstrate a compelling legitimate interest that would override you interests, rights or freedoms;
- You object to the processing of your personal data for direct marketing purposes;
- You believe we have processed your data unlawfully;
- Your data must be erased in order to comply with EU or Member State law.

Right to restriction of processing

You have the right to ask us to restrict or suppress the processing your personal data. This right is set by Article 18 of the GDPR. Under the GDPR, we can fulfil this right when:

- You challenge the accuracy of your personal data for a period, enabling us to verify the accuracy of the personal data;
- You have objected to the processing of your personal data (according to Article 21(1) of the GDPR) and you are waiting for verification of whether our legitimate grounds override your interests, rights or freedoms;
- You believe the processing is unlawful and want to restrict the use of your data instead of deleting your data;

- You believe we no longer need to process your personal data for our intended purposes, but you need this data to establish, exercise or defend legal claims.

Right to lodge a complaint

Having received the request or complaint from you, we will make every effort to resolve an issue concerning your personal data.

You can reach us at any time via email.

If you believe that we have no opportunity to resolve the issue, you may address the data protection authority directly. The right to lodge a complaint is set by Article 77(1) of the GDPR.

In Cyprus, the data protection authority is the Office of the Commissioner for Personal Data Protection, which is available via www.dataprotection.gov.cy.

7 How you can exercise your rights

Processing of data subject requests

You can communicate questions related to personal data to our Data Privacy Specialist:

- via email at dpo@koronapay.eu; or
- using contact details [above](#)

8 Policy Amendment

From time to time we may change the current policy and adopt its new version on koronapay.eu. The main reasons of policy amendment may be changes in applicable legal requirements.

We will inform you about new version via news message on koronapay.eu.

In such notifications we will highlight to you the summary of main changes and describe how you can learn more information about it.

In the event of significant changes in data processing terms, such as those concerning the nature or means of processing, we will notify you about such changes before they become effective.