



Sport Time Balkans d.o.o, Omladinskih brigada 88, 11070 Novi Beograd
Phone number: +381 11 44 22 010

PRIVACY NOTICE FOR THE PROCESSING ACTIVITIES CARRIED OUT DURING THE RECRUITMENT PROCESS

For purposes of this Privacy Statement, we refer to SPORT TIME BALKANS DOO. Belgrade with headquarters in Belgrade, Republic of Serbia, SPORT TIME EU EOOD with headquarters in Sofia, Bulgaria, and SPORT TIME TRADE S.R.L. with headquarters in Bucharest, Romania, and collectively, as "Sport Time" or "We" means the Sport Time entity which you are interacting with choosing the country where you are applying for a job.

Sport Time has created this Applicant Privacy Notice ("Notice") to explain how we collect and use information that we collect through our website www.sporttimegroup.com ("Website") - section Career (the "Career") and offline in connection with your application for a job or internship with Sport Time. This Notice concerns the personal data of our job applicants processed by us for recruitment purposes, as well as the personal data of any potential job applicants we may contact regarding job opportunities at Sport Time.

Please note that the Career section is not intended for minors under the age of 16. We may update this Notice from time to time. This version was published on January 15th 2024.

I. DEFINITIONS

The specific expressions, as well as the abbreviations in this Information Notice, will have the following meaning:

- **"GDPR"** - Regulation (E.U.) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/E.C.
- **"Sport Time affiliate"** - means an entity that owns or controls, is owned or controlled by, or is under common control or ownership with Sport Time, where control is defined as the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of an entity, whether through ownership of voting securities, by contract or otherwise.
- **"processing"**- any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.



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- **"recipient"** - a natural or legal person, public authority, agency, or another body, to which the personal data are disclosed, whether a third party or not.
- **"sensitive data"** - personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- **"data subjects", "controller"** - shall have the meaning set forth by the provisions of the GDPR.

II. Data Controller(s) and contact details of Controller(s)

The country-specific controllers are listed below and it may be updated from time to time.

For applicants in:

- **Serbia** - Sport Time Balkans doo. Belgrade with headquarters in Belgrade, Republic of Serbia, address Omladinskih brigada 88, 11070 Belgrade; E-mail address: data.protection@sporttime.rs
- **Bulgaria** - Sport Time EU EOOD with headquarters in Sofia, Bulgaria, address 102-D Cherni vrah Blvd., fl. 7, Triaditsa district; E-mail address: data.protection@sporttime.bg
- **Romania** - Sport Time Trade S.R.L. with headquarters in Bucharest, Romania, address 11 St. Dinu Vintila, Euro Tower, 7th floor; E-mail address: data.protection@sporttime.ro

For personal data related questions related to recruitment, you can reach us through the above contact details or e-mail addresses.

III. What types of personal data do we use?

Personal data in this Notice means information that identifies job applicants and potential candidates for employment with us, either submitted as part of the online application and/or through alternative channels.

In accordance with applicable legislation, we collect and process information as follows:

A: Categories of data provided directly by you in connection with your application ("Personal Data"), including:

- **Identity data** such as full name, date of birth, gender, data for your identification documents (number and date of issuing) or similar information;



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- **Contact data** such as contact details including residential address, telephone number, e-mail address, and other contact information;
- **Application data** such as CV, résumé, cover letter, previous work experience, information relating to references, or other related information;
- **Skills and competencies data** such as education information, professional and other work-related licenses, permits and certifications held, test or evaluation results and other related data;
- **Demographic information** such as disability information, citizenship and other sensitive or special categories of personal data, many of which will only be processed with your consent or based on other applicable legal ground;
- **Sensory data** such as audio, electronic, visual and similar information (may include interviews, photographs, CCTV, etc.);
- **Admission test data** (if conducted during the recruitment process) such as outcome and results of any test or evaluation results carried out in connection with recruitment (whether technical, written or oral) and other related data and information;
- **Right to work-related data** such as work permit and similar documentation regarding your right to reside in the country your applying to work in; and
- **Any other information** you elect to provide to us (e.g., employment preferences, willingness to relocate, desired salary, awards or professional memberships).

B: Categories of data we process about you from third parties, including publicly available sources:

- **Data from websites specialized in recruitment services;**
- **Data from social networks (Facebook, LinkedIn, Instagram):** professional experience, previous collaboration with other employers/collaborators, information on involvement in specific projects or professional activities, data on social and private life, publishing activity, participation in conferences, round tables, and other specialized or social events;
- **Data from professional networks (bar association, UNBR, ACCA):** professional experience, previous collaboration with other employers/collaborators, information on involvement in specific projects or professional activities, data on social and private life, publishing activity, participation in conferences, round tables, and other specialized or social events;
- **Data from online professional magazines, online press, websites of former or current employers or collaborators, other sources offered by Google search tools** - professional experience, previous collaboration with other employers/collaborators, information on involvement in specific projects or professional activities, data on social and private life, publishing activity, participation in conferences, round tables and other specialized or social events;



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- **Data from any Sport Team entity and our employers** – recommendations of you as a potential candidate;
- **Data from former employers/collaborators, other individuals/entities you indicate us for recommending you** – data regarding your relation with them, your professional performance, your skills, information on involvement in certain projects or professional activities.

Sport Time is an equal opportunity employer, which means we offer equal treatment to all applicants. In certain cases, we will ask you to provide information about your race/ethnic origin, gender and disability, for the purpose of monitoring equal opportunity within our recruitment process. You can choose to provide this information on a voluntary basis. The relevant job vacancy will indicate whether the relevant information is mandatory or voluntary. Otherwise, we ask that you avoid submitting information which may qualify as sensitive information under applicable law, except where such information is legally required.

Any information you submit through the Career section must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that the information you submit does not violate any third party's rights.

If you provide us with the Personal Data of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

In addition, we collect any other information provided by the applicant or generated by us during the recruitment process and communication with us. This information may include personal references as provided or information on your LinkedIn profile, if you have opted to apply with LinkedIn.

We only collect and store information that is either relevant for filling in the position in question or necessary for the rights and obligations of either party in the context of establishing an employment relationship.

In certain cases, we may also engage in candidate sourcing and headhunting in order to fill certain positions ("Candidate Sourcing"). In this context this Notice will also be applied.



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IV. How do we collect your personal data?

Primarily, we collect Personal Data directly from you. We and our service providers collect Personal Data in a variety of ways, including:

- Through the Career section of our Website
We collect Personal Data through the Career section, for example, when you submit your CV or apply for a job.
- Offline
We collect Personal Data from you offline, for example, when you send us your CV by post or provide Personal Data by telephone.
- From Other Sources
We collect Personal Data from third parties, such as, LinkedIn, professional networks (bar association, UNBR, ACCA) and via recruitment agencies.
For the purpose of background check reports in connection with your application, and as permitted by applicable law, Sport Time or its affiliates obtains information about you from other sources, which include:
 - Your references;
 - Prior employers; and
 - Educational institutions you attended.
- Through cookies and other tracking technologies. We collect certain information that is automatically sent to us by your web browser when you use our Website and recruiting tools. This type of information generally includes, for example, your IP address, device type and the name of your operating system and browser version. We also obtain certain data from cookies and other similar technologies that facilitate our recruiting process.

The volume and nature of the categories of personal data that we will process during the recruitment process may differ, depending on the position within the Sport Time for which you applied / for which we analyzed your application as well as the Sport Time entity offering the position.

V. How do we use your personal data?

Personal data processed under this Privacy Statement is processed in order to carry out candidate sourcing, recruitment processes, candidate evaluation and communication. Applicant data is processed on the basis of a pre-contractual relationship at your request in order for us to assess the potential grounds for entering into an employment contract with you.



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We collect and process information about you for one or more of these reasons, based on the following legal grounds:

- a) Because this information is necessary to take steps at your request prior to **entering into an employment or internship contract** (in accordance with art. 6, alin (1) lit b) of the GDPR, i.e. in accordance with local applicable law)
- b) Because this information is of particular importance to us and we have a specific **legitimate interest** under law to process it (in accordance with art. 6, alin (1) lit f) of the GDPR, i.e. in accordance with local applicable law);
- c) To comply with a **legal obligation** (in accordance with art. 6, alin (1) lit c) of the GDPR i.e. in accordance with local applicable law);
- d) Because you voluntarily provide this information and **consent** for us to process it (in accordance with art. 6, alin (1) lit a) of the GDPR i.e. in accordance with local applicable law);

Where the collection or processing is based on your consent, you are free to refuse or withdraw consent at any time, without consequence to your application, to the extent permitted by applicable law. The withdrawal of consent shall not affect the lawfulness of the processing based on such consent before its withdrawal.

The information that you submit on the Career section will be used for Sport Time companies (country specific) personnel recruitment, management and planning purposes, as permitted by applicable law:

- To process your application. We will engage in these activities to manage our prospective contractual relationship with you, where we have a legitimate interest to do so; To assess your capabilities and qualifications for a job. We will engage in these activities to manage our prospective contractual relationship with you, where we have a legitimate interest to do so;
- To perform reference checks. Certain vacancies require the provision of specific references, which will be listed in the relevant job vacancy description. In such case, we use information to conduct reference checks. We will engage in these activities to comply with a legal obligation or where we have a legitimate interests to do so;
- To communicate with you. We will communicate with you about your application, and to send you information regarding the Career Site and changes to our terms and policies. We will engage in these activities to manage our prospective contractual relationship with you;
- To comply with or monitor compliance with any applicable law or regulation. We will engage in these activities to comply with a legal obligation or where we have a legitimate interest to do so. Note that compliance with law can include laws outside your country of residence;



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- To perform pre-employment background checks. Certain vacancies require a pre-employment background check, which will be listed in the relevant job vacancy description. In such case, we use information to conduct background checks if we offer you a position. We will engage in these activities to comply with a legal obligation or where we have a legitimate interests to do so;
- Legitimate business purposes. Where we have a legitimate business interest to do so, for example, for Sport Time's administrative purposes, internal aggregate management reporting, internal training; and
- With your consent, but only for purposes where we request information that you can provide on a voluntarily basis, such as consent to process diversity information for purposes of monitoring equal opportunity of our recruitment process or to keep your cv on our international candidate database for future consideration.

If we hire you, the Personal Data we collect in connection with your application can be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes.

Providing Personal Data to us through the Career section is voluntary. However, if you do not provide sufficient information, Sport Time may be unable to consider your employment application or, if you are hired, your subsequent promotion, transfer or relocation.

When engaging in Candidate Sourcing we process personal data based on our legitimate interests to hire qualified staff to service our business.

We also store personal data under this Privacy Statement for a certain period based on our legitimate interest for the purpose of possible litigation, claims or regulatory investigations.

Sport Time does not process your data via an automated decision-making process (i.e., making decisions without human involvement) that could produce legal effects or any other similar significant impact for you.

VI. Who has access to your data?

We will limit access to Personal Data to personnel with a business need-to-know the information for the purposes described in this Notice, including personnel in the recruiting, human resources and information technology departments, and in the department responsible for your interview and/or for the position for which you are applying. Your Personal Data may be accessed by personnel from our affiliates, insofar this personnel has a business need-to-know the information to be able to consider you for one of their vacancies.



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Sport Time also shares Personal Data with our third-party service providers to facilitate services they provide to us, including but not limited to various consultants we work with (e.g., for the testing activities during the recruitment process, contractors, consultants, lawyers, etc.), auditors, IT service providers, security services, hosting and operating the Website/Career section, recruiting assistance, and background check processing.

We also use and disclose your Personal Data as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To respond to requests from public and government authorities. These can include authorities outside your country of residence.
- To cooperate with law enforcement. For example, when we receive law enforcement requests and orders.
- To enforce our terms and conditions; and
- To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

We may share personal data with third parties outside of our organization for other reasons than the ones mentioned before, when we have your explicit consent to do so. You have a right to withdraw such consent at any time.

VII. For how long will we keep your data?

Personal Data of candidates applying for a job will be kept for no more than one year, or such shorter period as required by applicable law. If required by applicable law, Sport Time will ask for your consent to keep your Personal Data for the above retention periods.

If you have not been selected for the position for which you have applied, Sport Time will archive your data for a period of 3 (three) years from the date of submission of the refusal in order to be able to defend itself in case of any proceedings initiated by you or, after in order to be able to initiate any investigations or other relevant procedures. In this case, Sport Time **will not** process such data for any other purpose. Upon expiry of the archiving period, Sport Time will delete your Personal Data.



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VIII. How do we secure your data?

We do our best to keep your data safe and secure. We seek to use reasonable organizational, technical and administrative measures to protect Personal Data within our organization. Our security controls are designed to maintain an appropriate level of data confidentiality and integrity. The personal data stored under this Privacy Statement shall only be processed on a need-to-know basis. The use of personal data is protected by appropriate user rights, passwords and rights of use.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the section I "Data Controller(s) and contact details of Controller(s)".

IX. International data transfers

Personal Data for applicants in Bulgaria and Romania is primarily stored within the European Economic Area, and for applicants in Serbia Personal data is stored in Serbia.

However, in certain cases we may transfer or access Personal Data outside the European Economic Area. In such cases we provide adequate protection for the transfers of personal data to countries outside of the European Economic Area through a series of agreements with our service providers and/or our companies based on approved legal mechanisms, like standard contractual clauses and intercompany group agreements.

In addition, if and to the extent that a court of competent jurisdiction or supervisory authority orders (for whatever reason) that the measures described in this Privacy Statement cannot be relied on to lawfully transfer personal data outside the European Economic Area (within the meaning of applicable laws), we may implement any additional measures or safeguards that may be reasonably required to enable the lawful transfer of such Personal Data.

X. Does this Notice cover third-party websites?

This Notice does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the website links. The inclusion of a link in the Career section does not imply endorsement of the linked site or service by Sport Time or our affiliates.



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XI. What if you already have a position at Sport Time?

If you currently work for Sport Time or one of our affiliates, you can use the Website/Careers section to apply for a different position within Sport Time. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with the HR manager for the new position concerning application eligibility, benefit programs, and HR policies applicable to that position.

The Career section is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation. How can you contact us or make a complaint?

If you have questions, requests or complaints, please feel free to contact us at hr@sporttime.rs.

Because e-mail communications are not always secure, please do not include sensitive information in your e-mails to us.

XII. Your Rights

To change Personal Data that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your Personal Data if it changes or is inaccurate.

Where permitted by applicable law, you have the following rights:

- Right to access

You have a right to access the Personal Data processed by us. This means that you may contact us, and we will inform what personal data we have collected and processed regarding you and the purposes such data are used for.

- Right to withdraw consent

In case the processing is based on a consent granted by you, you may withdraw the consent at any time and prevent further processing if there is no other ground under which Sport Time can process your personal data.

- Right to correct

You have the right to have incorrect, imprecise, incomplete, outdated, or unnecessary personal data we have stored corrected or completed. You have the right to update for example your contact information or your other Personal Data.



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- Right to deletion ("right to be forgotten"):

You may also ask us to delete your Personal Data from our systems in certain circumstances listed in Art. 17 GDPR and we will take reasonable steps to inform other controllers that are processing the data that you have requested the erasure of any links to, copies or replication of it. We will comply with such request unless we have a legitimate ground not to delete the data.

- Right to restriction of processing

You may request us to restrict the processing of Personal Data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data (e.g. to establish, exercise, or defend a legal claim; to protect the rights of another natural or legal person; or for reasons of important public interest).

- Right to object

You may have the right to object on grounds relating to your particular situation to the processing of your Personal Data based on our legitimate interest. We will comply with such objection unless we have a legitimate ground not to.

- Right to data portability

You have the right to receive the Personal Data you have provided us with in a structured and commonly used format.

- Raise a complaint

You can raise a complaint about our processing with the data protection authority: National Authority for Supervision of Personal Data Processing:

- **For Serbia:** Boulevard Kralja Aleksandra no. 15, Belgrade, Republic of Serbia, cod postal 11120, <https://www.poverenik.rs/sr/>,
- **For Romania:** B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, cod postal 010336, Bucharest, Romania www.dataprotection.ro,
- **For Bulgaria:** Bul. Prof. Cvetan Lazarov 2, cod postal 1592, Sofia, Bulgaria, <https://www.cdpd.bg/>



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How to use your rights

If you want to use your rights, please use the contact information found above in section I Notice.

In your request, please make clear what Personal Data you would like to access or have changed or deleted, or otherwise let us know what limitations you would like to put on our use of your Personal Data.

We may reject requests that do not have a basis as being required by law in a particular jurisdiction, are unreasonably repetitive, excessive or manifestly unfounded.

In case you consider our processing of personal data to be inconsistent with the applicable data protection laws, you have a right to lodge a complaint with the local supervisory authority for data protection.

Competent authorities for European Union Countries can be accessed by visiting the European Data Protection Board site (<https://edpb.europa.eu/>) and competent authorities for Serbia can be accessed by visiting the site <https://www.poverenik.rs/>.

Please note that due to (among other things) the application process, which you can enter via the Career section, we may not be required to comply (or fully comply) with your request. In those circumstances, we will write to you explaining why we are unable to comply.

For your protection, we only implement requests with respect to the information associated with the particular e-mail address that you use to send us your request, and we may need to verify your identity before implementing your request. Please note that certain Personal Data may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

XIII. Privacy Statement changes

The Sport Time reserves the right to modify these Privacy Statement at any time. Any change shall become valid after its publication on the Website or in another adequate way. In this regard, we recommend that you regularly check the section related to the Privacy Statement in order to have the latest information.