



APPLICANTS FOR GRADUATE RECRUITMENT OPPORTUNITIES

Intelligence Trade & Consultancy Maritime Inc (hereafter called "ITCM" or "firm") collects and processes personal data relating to training contract and vacation scheme applicants to manage its graduate recruitment process. The firm is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Who are we?

The controller of your personal data for this recruitment process is ITCM.

Your personal data may be shared between ITCM's associated entities as necessary or appropriate. Don't worry, we've put measures in place to keep your personal data safe whichever ITCM entity processes it.

What information does the firm collect?

The firm collects a range of information about you in a variety of ways. Most of this is obtained directly from you, for example through application forms, CVs or resumes. Data may be obtained from identity documents you provide (for example a passport or driving licence), your correspondence with the firm or through interviews, meetings and other assessments.

In some cases, the firm collects personal data about you from third parties. The firm will usually obtain personal references (for example from your former employers) and information from employment background check providers and credit reference agencies. It may also obtain criminal records checks as permitted by law.

Why does the firm process your personal data?

The firm processes your data during the recruitment process to:

- run recruitment processes;
- maintain accurate and up-to-date contact details;
- obtain occupational health advice, to ensure that it complies with duties towards individuals with disabilities, meet its obligations under health and safety law;
- ensure effective general HR and business administration;
- maintain and promote equality in the workplace.

The firm relies on the following lawful grounds for the ways it processes your personal data:

- The firm needs to process your personal data during the recruitment process to achieve its legitimate interest to recruit and develop the next generation of lawyers for ITCM to ensure continued excellent service for clients. Where the firm relies on this legitimate interest to process your data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.
- In some cases, the firm needs to process personal data to ensure compliance with its legal obligations. For example, it is required to check a prospective employee's entitlement to work in the Greece and to comply with health and safety laws.
- For certain positions, it is also necessary to carry out basic criminal records checks to ensure that individuals are permitted to undertake the role in question. Where criminal records information is returned to us on this, we rely on a combination of our legitimate interest to recruit suitable staff for our business, together with your explicit consent.
- Some 'special categories' of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to individuals with disabilities and for health and safety purposes).
- Where the firm processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done on the grounds of both our legitimate interest, and a substantial public interest, to monitor equal opportunities. You are entirely free to decide whether to provide such data and there are no consequences of failing to do so.

Who has access to your personal data?

Your information may be shared internally, including with members of the HR team, partners, senior managers and employees (as appropriate) in the business area(s) in which you would work and IT staff if access to the data is necessary for performance of their roles.

The firm also shares your data with other third parties in order to obtain pre-employment references from other employers or colleagues, obtain employment background checks from third party providers.

Given that ITCM is an international shipbroking firm, your data may be transferred to countries outside the European Economic Area (EEA) to achieve the purposes set out in this notice.

How does the firm protect your personal data?

The firm takes the security of your data seriously. The firm has internal policies and controls in place to try to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Special category data is usually

restricted to relevant members of the HR team, although it may be shared with staff members outside of the HR team, if necessary, on a 'need to know' basis.

Where the firm engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does the firm keep your personal data?

The firm will hold your personal data for the duration of the recruitment process. If your application is unsuccessful, the firm will hold dispose your data after the completion of the recruitment process. If your application is successful, your personal data will be held as part of your personnel file, and in accordance with our employee privacy notice and retention policy for employees (which will be provided to you when you join us).

Your rights

As a data subject applying for a position with ITCM you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the firm to change incorrect or incomplete data;
- require the firm to delete or stop processing your data in certain circumstances, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the firm is relying on its legitimate interests as the legal ground for processing; and
- ask the firm to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the firm's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact ITCM at privacy@itcm.gr

If you believe that the firm has not complied with your data protection rights, you can complain to Greece Supervisory Authority is the Hellenic personal data Protection Authority (HDP), which can be contacted at contact@dpa.gr or on +30 210 647 5600.

What if you do not provide your personal data?

Certain information, such as contact details, your right to work in the Greece and payment details, have to be provided to enable the firm to enter a contract of employment with you. If you do not provide other information, this may hinder the firm's ability properly to administer the graduate recruitment process with respect to your application.

If you have any questions about the processing of personal data at the firm, please contact the ITCM at privacy@itcm.gr