

INFORMATION ON THE PROCESSING OF PERSONAL DATA IN THE EMPLOYMENT PROCESS

I. INTRODUCTION:

In this information, you can find more detailed information about the processing of personal data that we carry out under the employment process, i.e. which categories and whose personal data, for what purposes and on what basis we process. Furthermore, we state what rights the data subjects have, how they can exercise those rights, who they can contact to protect their rights, etc.

II. TERMS:

- **GDPR** - Regulation (EU) 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/EC (General Data Protection Regulation)
- **DATA SUBJECT** - a natural person (individual) whose identity can be established directly or indirectly, particularly on the basis of name, identification number, location data, network identifier or by using one or more features specific to the person's physical, physiological, mental, economic, cultural or social identity

III. DATA CONTROLLER:

Croatian Bank for Reconstruction and Development, Strossmayerov trg 9, 10000 Zagreb, OIB (PIN) 26702280390 (hereinafter: **HBOR**)

IV. DATA PROTECTION OFFICER:

For all inquiries regarding the processing of your personal data and/or exercising of your rights under the GDPR that are described in more details in our Privacy Policy, please contact:

Data Protection Officer to e-mail: dpo@hbor.hr

V. WE PROCESS PERSONAL DATA OF THE DATA SUBJECTS:

- a) Job applicants,
- b) Persons stated on certificates, diplomas, licenses, decisions, etc.,
- c) Family members of job applicants (certificates of status of children of veterans, certificates of status of children of civilian victims of the Homeland War, etc.)

VI. WE PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- a) Forename and surname, date and country of birth, personal identification number – OIB (PIN), permanent address/temporary address, data on identification document, citizenship,

- b) Professional qualification,
- c) Mobile phone number, e-mail address,
- d) A copy or original of the certificate or diploma, a copy of the decision on recognition of foreign qualifications, or the opinion of the competent body in the Republic of Croatia on the foreign qualification, which shows the degree and level of education concerned and the degree or level of education equivalent to it in the Republic of Croatia,
- e) Certificate of no criminal record,
- f) Record of employment (electronic record of legal employment status or scanned or photographed certificate from the Croatian Pension Insurance Institute),
- g) Data provided by the job applicant in the CV: data on education, work experience, skills, qualifications, interests, photographs (if in CV) etc.,
- h) Data regarding the implementation of activities regulated by the Act on Restrictive Measures, i.e. a copy of an identification document (official document with a photograph), information on whether the data subject is on the sanctions list. In addition to the above data, the data listed under a) in this point are also processed for the purpose of implementing the above activities,
- i) Psychological tests and opinions, professional tests,
- j) If necessary, other documents that are explicitly stated in the individual competition, with which job applicants prove that they meet the conditions stated in the competition (e.g. certificate of passing the bar exam, copies of category B driving license, etc.).

VII. WE PROCESS PERSONAL DATA FOR THE PURPOSE OF:

- a) Processing of job applications
- b) Selection of candidates
- c) Establishment of an employment relationship

VIII. WE PROCESS PERSONAL DATA ON THE LEGAL GROUNDS:

- a) If the processing is necessary for the performance of a contract to which the data subject is a party or in order to take actions at the request of the data subject prior to the conclusion of the contract, the processing of job applications, the processing for the purpose of concluding employment contracts (Article 6, paragraph 1, sub-paragraph b. of the General Data Protection Regulation) or
- b) If the processing is necessary for compliance with HBOR's legal obligations, regulations in the field of restrictive measures, regulations in the field of pension and health insurance, tax regulations, regulations determining the right to preferential employment under equal conditions, etc. (Article 6, paragraph 1, sub-paragraph c. of the General Data Protection Regulation).

IX. WE TRANSFER PERSONAL DATA TO RECIPIENTS (depending on the purpose of processing):

- a) State institutions and other bodies (ministries, agencies, etc.),
- b) The Croatian Pension Insurance Institute, the Croatian Health Insurance Fund, Tax Administration,
- c) Employment platforms,
- d) Legal entities that conduct online psychological and professional testing,

- e) Providers of cloud services and other communication and information services, etc., in which case personal data may be transmitted to recipients outside the EU.

X. WE COLLECT YOUR PERSONAL DATA:

We collect personal data about job applicants from the following sources:

- a) From job applicants
- b) From legal entities through which the job applicant submitted his/her job application (employment platforms or similar).

XI. TRANSFERS TO THIRD COUNTRIES AND INTERNATIONAL ORGANIZATIONS:

We do not transfer personal data to international organisations.

We transfer the personal data we collect from you to data processor or sub-processors established in a country outside the EU/EEA (i.e. a so-called third country) or to the United States of America. For the purpose of such data transfer, we take all necessary steps required by applicable regulations to ensure that such transfer of your personal data complies with the respective regulations. We will transfer your personal data to a country outside the EU/EEA only if: (i) the European Commission decides that the third country ensures an adequate level of protection or (ii) the transfer is protected by the use of EU standard clauses (pursuant to Article 46 of the GDPR).

XII. WE STORE PERSONAL DATA OF DATA SUBJECTS:

We store the personal data of data subjects for a period specified by individual regulations. If the storage period is not prescribed or a minimum storage period is prescribed, it shall not be longer than what is strictly necessary to achieve the purpose for which the personal data is processed.

Periods of storing personal data in the employment process:

- a) 2 years after the administration of psychological testing – psychological tests
- b) 6 years after the end of the year in which the job applicant applied for the vacancy – data obtained during the job application process
- c) 10 years after the termination of the employee's employment – data related to the implementation of activities regulated by the Act on Restrictive Measures
- d) Permanently – we must comply with the Act on Archival Material and Archives, which obliges us to permanently retain certain documentation and data (documentation from the employment process used to establish employment relationship, e.g., school/university diplomas, certificates of no criminal record, electronic records of data from the Croatian Pension Insurance Institute registry, mandatory insurance registrations, employment contracts, etc.). Pursuant to the Act on Archival Material and Archives (Art. 14), archival material is to be transferred to the competent state archive within a period generally not exceeding 30 years from its creation, while material in digital format is generally to be transferred within a period not exceeding ten years from its creation (unless the archival material is necessary for HBOR's operations, a matter decided by the competent state archive).

XIII. THE RIGHT OF ACCESS TO INFORMATION ACT:

We would like to inform you that access to personal data may be provided to third parties pursuant to the provisions of the Right of Access to Information Act.

XIV. RIGHT OF DATA SUBJECTS AND MANNER OF EXERCISING RIGHTS:

The data subject has all rights established by the GDPR. The rights of data subjects and the manner of exercising rights are described in more details in the Privacy policy.

XV. UPDATING OF INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA IN THE EMPLOYMENT PROCESS:

This information was last updated on 12.6.2026.