

Privacy Notice Careers

GENERAL

This Privacy Notice is applicable to all applicants and presumptive candidates. Where appropriate based on the context of this Privacy Notice, the term “recruitment” shall equally apply to individual applications, referrals and recruitment via agencies.

This Privacy Notice may also apply to applicants’ referees and/or next of kin. If you provide “Scandi-AZ Retail” LLC with personal data of third parties (such as referees), you are responsible for informing them about this Privacy Notice.

Who is responsible for processing your personal data?

“Scandi-AZ Retail” LLC is the controller of personal data within the meaning of the Law of the Republic of Azerbaijan “On Personal Data”, unless otherwise explicitly stated in the relevant section of this Privacy Notice.

Where do we store your personal data?

Personal data collected by “Scandi-AZ Retail” LLC is processed and stored within the information systems used by the Company.

Such data may be stored and processed:

- in the territory of the Republic of Azerbaijan; and/or
- outside the territory of the Republic of Azerbaijan, where such processing is necessary for achieving the purposes specified in this Privacy Notice.

Any cross-border transfer of personal data shall be carried out in compliance with the legislation of the Republic of Azerbaijan and subject to the implementation of appropriate organizational and technical measures to ensure the protection and confidentiality of personal data.

Who has access to your personal data?

Only “Scandi-AZ Retail” LLC has access to your personal data, including its contracted suppliers and trusted partners carrying out certain tasks on its behalf. “Scandi-AZ Retail” LLC may also share personal data with other legal entities within the “Scandi-AZ Retail” LLC to the extent necessary to accomplish the intended purpose of processing, however, without compromising any of your rights.

Please be aware that many of these third-party recipients have an independent right or obligation to process your personal data in their own responsibility. We may share your personal data with external parties under the following circumstances:

Purpose of processing	Category of recipients
Talent acquisition and recruitment	Recruitment agencies, Applicant Tracking System (ATS) provider, specialized assessment center providers, background/reference checking provider
IT environment that facilitates daily operations and supports employment processes	Information Technology, integrated platform and service providers, external training providers
Compliance with labor practice and applicable laws	Trade union, public authorities, government bodies, auditors
Health and Safety	Insurance provider, travel tracker service provider, emergency response planner, health service management, counselling and support service, auditors, public authorities
Cyber-security, asset protection, loss prevention, and investigation of disloyal or malicious activities	Security service providers, forensic firms, public authorities, surveillance camera providers, insurance providers
Organizational development and optimization	Survey service providers, compensation benchmarking agencies, trade unions, counselling and support service, internal and external communication channels

What is the legal ground for processing?

Personal data is processed by “Scandi-AZ Retail” LLC only where a lawful ground exists in accordance with the legislation of the Republic of Azerbaijan.

Such lawful grounds may include the necessity for taking steps prior to entering into an employment contract, fulfilment of obligations arising from labour and other applicable legislation, consent of the data subject where required by law, as well as protection of the legitimate rights and interests of the Company, provided that such interests do not override the rights of the data subject.

What are your rights?

Right to access:

You have the right to request information about the personal data we hold on you at any time. We will provide you with your requested information via appropriate means of communication.

Right to portability:

Where applicable and in accordance with the legislation of the Republic of Azerbaijan, you may request a copy of personal data provided by you to the Company, processed by automated means, to the extent permitted by law.

Right to rectification:

You have the right to request rectification of your personal data if they are incorrect, including the right to have incomplete personal data completed.

Right to erasure:

You have the right to request erasure of your personal data processed by us at any time. Your personal data may continue to be processed under certain circumstances, we will fully erase your personal data once it is no longer necessary for the purpose for which we originally collected or processed it, or when we are no longer legally required to process it.

Your right to object to processing based on legitimate interest:

You have the right to object to processing of your personal data that is based on “Scandi-AZ Retail” LLC’s legitimate interest. “Scandi-AZ Retail” LLC will stop processing your personal data and immediately erase it, unless we can demonstrate a legitimate reason for the processing which overrides your interest and rights or due to legal claims.

Where automated or semi-automated tools are used as part of the recruitment process, such tools are applied solely to support the assessment process and do not replace human decision-making.

In such cases, you may request clarification regarding the applied processing and contest decisions affecting you, in accordance with applicable legislation.

Right to restriction:

You have the right to request that “Scandi-AZ Retail” LLC restricts the process of your personal data under the following circumstances:

- if you object to a processing operation based “Scandi-AZ Retail” LLC’s legitimate interest, “SCANDI-AZ RETAIL” LLC shall restrict all processing of such data pending the verification of the legitimate interest;
- if you have claim that your personal data is incorrect, “SCANDI-AZ RETAIL” LLC must restrict all processing of such data pending the verification of the accuracy of the personal data;
- if the processing is unlawful you can oppose the erasure of personal data and instead request the restriction of the use of your personal data instead;
- if “SCANDI-AZ RETAIL” LLC no longer needs the personal data but it is required for you to make of defending legal claims.

How can you exercise your rights?

We take data protection very seriously and therefore we have a dedicated process to handle your requests in relation to your rights stated above. You can submit your request in the following way:

- Email your request to: Careers@sinteks.com

Contact person for personal data protection:

For matters related to the processing of personal data, “Scandi-AZ Retail” LLC has designated a responsible contact person for personal data protection matters, who may be contacted via the contact details specified below.

- dataprivacy@sinteks.com

Right to complain:

If you consider “SCANDI-AZ RETAIL” LLC to process your personal data in an incorrect way, we expect you to contact us immediately. You also have the right to turn in a complaint to the competent supervisory authority.

Azərbaycan Respublikasının Rəqəmsal İnkişaf və Nəqliyyat Nazirliyi / Ministry of Digital Development and Transport of the Republic of Azerbaijan

RECRUITMENT

Why do we process your personal data?

The main reasons for using your personal details are to recruit, both internally and externally, suitable candidates and to manage candidate pipeline. Your personal data will be used for the below purposes:

- To identify, evaluate and communicate with presumptive and prospective candidates;
- To screen, select and assess candidates for a vacancy;
- To establish and maintain talent acquisition where job alerts may be pushed out;

When necessary, we may use an automated system, including profiling and/or assisted decision-making, to shortlist applicants. The source of the data we use in such automated process may include information you provided in your application, data collected during the ongoing application and from previous applications. We employ automated recruitment tool not only to expedite the recruitment process when there is a high volume of applications, but also to ensure a fair and objective assessment of your application. You have the right to obtain an explanation and challenge the decision reached by contacting email listed in this policy or contact your recruiter directly.

What types of data do we process?

We will process the personal data being submitted to us either by yourself or by a third party. We will process the following categories when you submit your application to us:

- Contact information such as name, e-mail address, postal address and telephone number
- Date of birth
- Employment and education history
- Skills, certificates and all other information included in your CV

- References
- Documentation generated during recruitment process, such as interview notes and test results and/or answers
- Video, photo and audio

We do not request sensitive personal data, for example racial or ethnical origin, political views, religious or philosophical conviction, union membership, health or sexual orientation. Please refrain from including such information in your application unless it is required by law or necessary for “SCANDI-AZ RETAIL” LLC to comply with legal obligations.

What is the legal ground for processing your personal data?

Candidate selection process along with contract negotiation is carried out where such processing is necessary for taking steps prior to entering into an employment relationship. Optimization of the recruitment process, administration of talent pools, referral programs, processing of referee data, and participation in job fairs and surveys are carried out based on the legitimate rights and interests of “SCANDI-AZ RETAIL” LLC, in accordance with the legislation of the Republic of Azerbaijan. Sending employer branding material and job alerts (via the “SCANDI-AZ RETAIL” LLC Career site) is based on the consent of the data subject.

How long do we keep your data?

We will keep your data for a maximum period of five years from when the data was last handled within our recruitment process.

SECURITY

Why do we use your personal data?

Security measures, including physical and information security, are vital to protect our employees, customers, and our business. Therefore, your personal data may be used for the below purposes:

- To protect workplaces, facilities and equipment, and all information contained therein from incidents, accidents, and malicious/criminal attacks.
- To ensure online safety for our customers, users, visitors, assets and business against cyber-attack, fraud, misuse, and other malicious activities.
- To generate security analysis and reports on aggregated level.
- To assess, investigate, document, and report a crime or act of disloyal behavior based on a serious suspicion, such as breach of law, company policies fraudulent activities etc., for example through a digital forensic investigation.

- To ensure "SCANDI-AZ RETAIL" LLC 's legal compliance and protect our position in the events of potential crime reporting & investigations.
- To establish, exercise and/or defend, current and/or future, legal claims, or disputes.

What type of data do we process?

Where applicable, we may process the following categories:

- Contact information such as name, address, e-mail address and telephone number
- System logs linked to identifiers such as fob key, user ID and e-mail address
- Employment related information such as job role, department, and cost center
- IP address and device ID
- Data stored in/on company owned devices/(cloud) servers, including e-mails or other messages sent or received through your work email account and all digital collaboration linked to it.
- Video footage captured by Surveillance cameras in our stores, warehouses, and offices.
- Incident and accident logs

Such logs may contain data such as injuries sustained, claimant identity and contact information, and other details about the incident including (suspected) criminal activity

What is the legal ground for processing your personal data?

Unless there is a specific legal obligation, the processing of your personal data is based on our legitimate interest for us to ensure an appropriate level of physical, personal, and information security.

How long do we keep your data?

We will keep your personal data for the duration necessary to fulfill the various security purposes listed above. Notably, camera surveillance data is kept for 40 days unless there is a compelling or obligatory reason to retain it longer. System logs linked to your access credentials are kept for up to 24 months after deactivation. Personal data included in security audit reports are saved for 5 years.

OPERATIONAL & ORGANISATIONAL DEVELOPMENT

Why do we process your personal data?

"SCANDI-AZ RETAIL" LLC runs various programs and initiatives for different purposes, aiming at developing our internal operational and organizational capabilities. In this context operational and organizational capability development mean the development, improvement and enhancement of our company brands,

employer branding, company values and culture, health and safety at work and general well-being. Being a high performing organization and an employer of choice is a paramount objective for “SCANDI-AZ RETAIL” LLC as a business, securing long term growth in a competitive industry.

On a regular basis or occasionally you may be asked and encouraged to contribute to these objectives, either by participation in surveys or polls or through performance at certain events, campaigns, conferences, or workshops. Your engagement may sometimes require the collection and use of your personal data, which may vary from time to time and situation:

- To improve candidate relations by conducting activities such as surveys, ratings, etc.
- To remain a competitive employer through initiatives such as employer branding, Inclusiveness & Diversity, etc.

What type of data do we process?

What type of data we need to collect from you and to process may vary due to the scope, context objective, venue or occasion etc. However, we will only ask you to provide your personal data that are necessary for the particular purpose. In no event we will ask for sensitive personal data that relate to your ethnical origin, political opinions, religious or philosophical belief, sexual orientation, trade union membership or health data.

Examples of personal data we may obtain from you are:

- Contact information i.e. name and e-mail address, e.g. when you are participating in surveys and polls;
- Photo, video and audio recordings, e.g. when you act as an ambassador for your function/role;
- Work related information such as role/function, department, geographical location, compensation package;
- Quotes and statements made by you

What is the legal ground for processing your personal data?

Any collection and processing of employee personal data, fitting with the objectives of developing our operational and organization capabilities, is justified on our legitimate interest as a company, business and employer.

How long do we keep your data?

We will keep your personal data no more than necessary for the purposes the personal data was collected.