

# HIRING PRIVACY POLICY.

## 02\_Personal data Policies

02.RH\_Human Resources Policies

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**Code/Unit:** 02.RH.P2-2

**Type:** Digital

**Confidentiality:** Public

**Available on:** website

Brighten ISO/IEC 27001 certified



# HIRING PRIVACY POLICY

## 1. Scope

**BRIGHTEN – Consultores em Sistemas de Informação S.A.** (also referred to below as “Brighten”, “we”, “us”, “our”, or “the firm”) is a privacy conscious organization, committed to protecting the privacy of our people and those who seek employment with us (“Candidate(s)” or “data holder”). It is important to us that you understand what information we collect, how we use it and how we protect it.

By sending us your personal and professional data you agreeing to the use of your information as described in this Privacy Policy.

- Brighten institucional website ;
- Job advertisements or spontaneous applications;
- Social Networks (LinkedIn);
- In person, by SMS, email, letter or other means of communication.

By using the resources available in **Join us** on our website or on social media, we may collect Cookies and use other tracking Technologies to provide our candidates with a personalised online experience, send you information about careers and opportunities at BRIGHTEN, and analyse the effectiveness of our recruitment efforts and resources.

In the selection and recruitment processes, BRIGHTEN will request data such as academic qualification and professional experience or other information relevant to open opportunities, may, in certain situations and to the extent that the legislation in force so determines, need additional data, such as data on possible criminal convictions or offences.

## 2. Data Holder Categories

- Candidate(s) applying for an open job position

For the data holder category referred above, Brighten is committed in protecting your personal data even if it is obtained through an intermediary or through third-party service provider who is required to take appropriate security measures to protect your personal data in line with our policies.

Brighten collects personal information that you as Candidate, or a third party on your behalf, submit to us. The personal information collected will vary based on your application or employment status. For example, at the initial application stage, personal information will be limited to that which you or a third party on your behalf, sent us initially when applying for a job. This can include items such as your name, contact information, employment and education

history. As you move through the recruitment process more information may be collected like your criminal record.

### 3. For what purpose to we collect your data

**Purpose:** (i) Registration and retention on the BRIGHTEN databases of the candidate's submitted personal data for available job offers; (ii) evaluation and identification of the candidates profile to the open vacancy; (iii) Preliminary calculation of salaries and bonuses of admitted candidates to the recruitment process. The data will only be used for these purposes.

We would like to draw your attention to the fact that health data, information on racial or ethnic origin, political, religious, trade union or sexual orientation are **among the data requiring special protection** (special categories of personal data pursuant to Art. 9 GDPR). Therefore, we would like to ask you **not to send such data to us**, neither in the form of CVs nor in the form of other documents and records.

As a data holder, you may **withdraw the consent provided for the processing of your data**, without compromising the lawfulness of the prior treatment consented to. By asking us to delete your data or profile, you will no longer be under consideration for any postings to which you've applied, and must create a new candidate profile in order to be able to apply for opportunities with BRIGHTEN.

### 4. What Personal Data we collect

We will collect, use and store the following categories of personal data about you:

- The data you have provided to us in your curriculum vitae (CV) and the personal data contained in your covering letter (if you send us one);
- The data you have provided may include, title, home/term address, telephone number, personal email address, date of birth, gender, employment history, qualifications, nationality, social media accounts, profession, professional memberships, educational achievements, diplomas, transcripts, languages, computer skills, national service completion (if applicable), identification number and any data you provide us during interviews at our premises and/or on online interviews;
- Assessment data created by recruiter(s) based on the joint interviews and interview notes as well as, if applicable, the results of online potential analyses carried out;
- Any personal data provided to us about you by your referees (if applicable);
- Criminal history information data (if applicable);

- Data generated by your participation in psychological, technical or behavioural tests (if applicable);
- When using our website we may collect your IP address and other information in cookies format. For additional information please check our **Cookies Policy**.

The communication of personal data by the Data holder for recruitment purposes is voluntary and free. By submitting your data, you agree and declare that the submitted information is true and correct, and no facts of adverse nature have been omitted. **If you fail to provide personal data when requested**, which is necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application further. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

## 5. Data Retention

We will retain your personal data depending on your involvement with the recruitment process:

- Your data will be retained for a period of 5 years if you are selected for a recruitment process, to fulfil **legal obligations**. We retain your personal data for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal data in accordance with our data retention policy;
- Your data will be kept in our database for as long as it is necessary to fulfill the relationship established with you;
- The personal data of candidates not suitable for a position will be kept by Brighten for a period of three (3) months for the purpose of further recruitment. Should there be a job position of interest to you at a later date, you can apply again at any time.

In any case, and at any time, as a data holder you may object to your application being considered in future recruitment processes compatible with your professional experience. For more information on how to exercise your right to object, please check **tab 7 - Candidates' Rights**, of this Policy.

Brighten will not require any conditions for the exercise of the right of opposition, other than the **need for the holder to exercise such right in writing**, so that Brighten can prove the request was processed under GDPR requirements. If the data holder exercises the right of opposition, Brighten guarantees the cessation of the respective processing and the deletion of the data.

Once the data has been deleted, the holder can apply again at any time to a open position by sending us a new CV.

## 6. Data Sharing

Your data may be shared with the following categories of recipients internal and/or external to Brighten:

- We will only share your personal data with authorized Brighten employees for processing your application purposes;
- Data might be transferred for Brighten branches (in accordance with the contractual relationship between Brighten and them) where vacancies are available;
- To third/party service providers and/or clients to comply with contract or legal obligations. We do not allow our third-party service providers and /or Clients to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7. Candidate Rights

Under certain circumstances, by law you have the right of access, deletion, object and rectification. In order to exercise these rights, you must submit the request in writing, to [privacy.officer@brightenconsulting.com](mailto:privacy.officer@brightenconsulting.com)

You also have the right to make a complaint at any time to the Personal Data Protection supervisory authority – [Comissão Nacional de Proteção de Dados \(CNPD\)](#), if you believe the processing of your data violates the legal regime in force.

## 8. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These measures have been defined in accordance with our **General Information Security Policy (PGSI)**. In addition, we limit access to your personal data to employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our specific instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from our website **General Information Security Policy (PGSI)**.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 9. Address Data Protection Queries

We have appointed a Data Protection Officer [DPO] to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the DPO at:

- To Brighten headquarters:  
A/C DPO  
  
Rua Cupertino de Miranda  
Lote 6, 2B,  
1600-513 Lisboa | Portugal
- By email to DPO email address: [privacy.officer@brightenconsulting.com](mailto:privacy.officer@brightenconsulting.com)