


<b>No:</b>	BSOG-DM-POL-004-D01	
<b>Date:</b>	05.10.2018	

## PRIVACY POLICY FOR RECRUITMENT

Dear candidate,

We wish to inform you by this policy about how Black Sea Oil & Gas SRL and the affiliates thereof ("BSOG" or "We") collect and use your data related to the candidate recruitment process.

If you have chosen to resubmit your CV or any other information about you about the recruitment process run by BSOG, it means that we have your consent to collect, store and use this data, as well as to disclose it to other people, in compliance with the specifications presented below.

### WHAT KIND OF PERSONAL DATA DO WE PROCESS?

**Personal data.** For recruitment, BSOG needs certain data and information related to:

- your education
- the contact data
- the position that you are applying for
- previous experience and professional training
- personal certifications and skills

You can also choose to send us other pieces of information, documents or data (i.e. resume, references, etc.) that we are going to use for the same purpose.

**Sensitive data.** BSOG does not request, for recruitment, sensitive data on religion, ethnicity, health or physical or mental status, sexual orientation or life, political opinions or affiliations.

To the extent the information you provide contains details of racial or ethnic origin; political opinions or affiliations; religion; membership of a political party; health or physical or mental condition; sexual orientation; perpetration or allegedly perpetration of a criminal offense or related proceeding; workplace assessments, you expressly authorize BSOG to process these details in compliance with this policy.

**Voluntary disclosure.** We remind you that providing the information and data to BSOG for recruitment is voluntary and you are in full control over the data that you submit.

***Nevertheless, please note that if you choose not to send us certain pieces of information or data, this may affect our ability to consider you as a candidate.***

### FOR WHICH PURPOSE AND ON WHICH GROUNDS DO WE PROCESS YOUR PERSONAL DATA?

**Goal** The personal information and data that you provide to BSOG is used to communicate with you about the recruitment process.

Also, if your profile does not meet the BSOG requirements in the recruitment process, with your consent, we will keep your information and personal data in order to run a new recruitment process for future positions within the company.

**Grounds.** The legal grounds according to the legal provisions is your **consent**.

## **TO WHICH INDIVIDUALS DO WE SEND YOUR PERSONAL DATA?**

BSOG can send your information within the company or the affiliates thereof related to the recruitment or employment, or for the fulfillment of obligations or the compliance with legal requirements or in order to respond to requests from public and governmental authorities in your country of residence.

The privacy of your data is important to us, which is why, where possible, the transmission of personal data in compliance with the aforementioned is done only in virtue of a privacy commitment on the part of the recipients, guaranteeing that these data is safely kept and that this information is provided in compliance with applicable law and policies. In any case, each time, we shall send to the recipients only the information strictly necessary for the achievement of such purpose.

## **DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EU/EEA?**

Taking into account that the BSOG affiliates are Romanian and foreign legal entities, your data may also be sent outside the EU/EEA.

Although the data protection laws in these countries may differ from those of your country, we shall take the necessary steps to ensure that your personal data is processed according to this policy and in compliance with the applicable law.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

Your personal data is kept throughout the accomplishment of the purposes detailed in this policy, if a longer period of retention is not required or allowed by the applicable law.

Nevertheless, insofar as you do not agree with BSOG processing the personal data **for the purpose of conducting a recruitment process for future positions** within the Company, **within 2 years or upon request**, we shall erase any data we hold related to the your recruitment application.

If the personal information is printed on paper, it shall be destroyed in a safe way by paper-shredding or otherwise, and if it is stored on electronic media, it shall be erased by technical means confirming that the information can no longer be retrieved or recovered.

## **ARE YOUR DATA SAFE?**

We treat your personal security very seriously, that is why we take significant security measures, necessary to protect against unauthorized access to data or unauthorized data alteration, disclosure or destruction. This requires internal review of the data collection, storage and processing practices, and security measures, as well as physical security measures to protect against the unauthorized access to the systems where we store the personal data.

## **WHICH ARE YOUR RIGHTS?**

As subject data, you benefit from the following rights stipulated by GDPR:

- a) **Right of access:** You may ask us to confirm that personal data are processed or not and, if so, access to such data and information about it (art. 15 in GDPR);
- b) **Right to rectification:** You can inform us about any change to your personal data or you may ask us to correct the personal data we hold about you (art. 16 in GDPR);
- c) **Right to delete** ("the right to be forgotten"): in certain circumstances (such as (i) the illegal collection of data, (ii) the expiry for the data storage deadline, (iii) your right to object has been exercised or (iv) the data processing was done in virtue of consent and you have withdrawn your consent), you may ask us to delete the personal data that we hold about you (art. 17 in GDPR);
- d) **Right to restrict the processing:** in certain circumstances (such as when you challenge the accuracy of such data or the lawfulness of the processing), you may ask us to restrict your data processing for a certain period (art. 18 in GDPR);

- e) **Right to data portability:** ask us to send your personal data to a third party or directly to you (art. 20 in GDPR);
- f) **Right to opposition:** In certain situations (such as processing legally grounded on the legitimate interest), you may ask us to no longer process your data (art. 21 in GDPR);

***If we use your personal data in virtue of your consent, you are entitled to withdraw this consent at any time, subject to the applicable law.***

**PERSONAL DATA OPERATOR  
Black Sea Oil & Gas SRL**

Address: 175, Calea Floreasca, 10<sup>th</sup> floor, 1<sup>st</sup> District, Bucharest, Romania;

If you have any questions or concerns related to the processing of your personal data or if you wish to exercise any of the aforementioned rights, you are welcome to send us an e-mail to the following address: [dpo@blackseaog.com](mailto:dpo@blackseaog.com).

During the business hours 8:30 a.m. – 5:30 p.m., you can contact us at the aforementioned address or you can call us at +40 212 313 256. Contact: Personal Data Officer.

You can also contact the local personal data protection authority, if you have questions and complaints.

Your **Consent** can be send on email, to the folwing email adress: [dpo@blackseaog.com](mailto:dpo@blackseaog.com) or could be expressed through Company WebSite <https://www.blackseaog.com> in the Careers section.

While expressing the consent:

1. I understand that I may ask the BSOG representatives to view my personal data and verify the accuracy thereof;
2. I understand that I may request copies of the documents containing my personal data at any time and that this request is free of charge;
3. I understand that I may request for my data to be deleted or destroyed;
4. I understand that, to the extent BSOG does not hire me, BSOG shall destroy the data and documents containing personal data within 2 years of my employment application or on my request;
5. I understand that the personal data protection officer is available and, to the extent that I have concerns or additional questions, I can refer to them to the e-mail address [dpo@blackseaog.com](mailto:dpo@blackseaog.com).

**Mark Douglas Beacom**

Chief Executive Officer  
Black Sea Oil & Gas SRL

Signature:

