

CANDIDATE PRIVACY NOTICE

(FOR CANDIDATES FOR STONUS GROUP COMPANIES)

Updated on 05/02/2025

1. Introduction

We, STONUS Group entities further listed in section "About us" ("STONUS Group", "we", or "us"), provide this notice to you because you are applying to work for one of our entities as an employee.

Please read this notice carefully in order to understand how we will use your personal data and how you can exercise your data protection rights.

2. About Us

In this privacy notice, we, STONUS Group entities, are the following companies incorporated in Lithuania:

- STONUS Group, UAB (registration number 304895955);
- Vlantana, UAB (registration number 163377040);
- STONUS Invest, UAB (registration number 304896427);
- Vlantanos ekspedicija, UAB (registration number 302931776);
- Vlantanos logistika, UAB (registration number 303321943);
- VAS Transport, UAB (registration number 163176386);
- D4Dxpress, UAB (registration number 302734693).

We, any of the STONUS Group entities to which you are applying for employment, are the Data Controller responsible for your personal data. We protect your data and privacy by taking all relevant security measures.

3. Data Protection Officer

We have appointed a Data Protection Officer.

If you have any questions about this privacy notice or your personal data or wish to exercise any of your rights as described in this notice, you can contact our Data Protection Officer through dpo@stonus.eu, also by post: Data protection officer, STONUS Group, Dvaro g. 1, Klaipėdos r., Lithuania.

4. When We Collect Your Personal Data

We collect your personal data:

- when you are applying for an open position at any of the STONUS Group entities;
- when we assess you as a candidate for an open position;
- when we seek to sign an employment contract with you;
- when we keep your personal data in order to invite you to apply for an open position in the near future.

5. Categories of Personal Data We May Be Collecting About You

Identify data, such as: name, surname, former names/surnames, personal identity number, date of birth, data of identity document, image, gender, country of residence, citizenship.

Contact details, such as: address, telephone number, email address.

Professional data, such as: previous employment history, experience, skills, education, relevant qualifications and supporting certificates, work eligibility, references.

Electronic communication data, such as: the data contained in messages, emails as well as other conversations and interactions, collected when you apply for a job or participate in a job interview.

Health data, such as: data about your physical or mental health (special category personal data), only when we decide to sign an employment contract with you.

Financial data including the details of your bank account, only when we decide to sign an employment contract with you.

CCTV recordings of video, when you are visiting our premises.

Dash camera recordings of video and sound, when you are applying for the position of cargo truck driver and undergoing a cargo truck driving test on-road.

Screen video recording equipment captures video and audio recordings if you are selected for the workplace of a truck driver

Candidate assessment information, such as: summary of the job interview, results of conducted tests or skill/qualification assessments, if applicable.

Data about criminal convictions and administrative offences when you apply for a position that requires good reputation relating to the absence of certain criminal convictions or certain administrative penalties. Such requirements apply if you are applying for position of the manager of a carrier company or the transport manager, as set by the Road Transport Code of the Republic of Lithuania.

Other data that you provide to us in your communications with us via technological tools; as well as other information contained in your curriculum vitae (CV), application letter and other supporting documents submitted, LinkedIn account details (if you share with us a link to it).

Cookies, when you visit our website. To find out more about cookies, please check the Cookie Policy available on the website.

6. Where We Collect Your Personal Data From

We collect most personal data about you either directly from you or from the recruiter you have authorized to provide us with such personal data on your behalf.

In order to verify your work experience, qualification and skills necessary for the position you are applying for, we may ask you to present us with references, letters or certificates. This is especially the case when you are a citizen of a third country who need a permit to live in Lithuania in order to be employed and for that we need to confirm in writing the fact that you do have the required experience and qualification and skills.

If we are applying for the position of cargo truck driver, you will have to undergo the qualification assessment which also includes cargo truck driving test on-road in the presence of a truck driving instructor. During the cargo truck driving test on-road, the dash camera installed inside the cabin of the driver training truck will record both the video (front camera facing the road and rear camera facing the inside of the cabin) and the sound inside the cabin.

If you are seeking employment as a truck driver, you will also need to pass a proper communication assessment, which includes a video chat using computer equipment with a specialist in the selection team, in the presence of the employee(s) of the selection team.

If you are applying for a position for which good reputation relating to the absence of certain criminal convictions or certain administrative penalties is required by law, in order to verify your good reputation, we will be obliged to ask you to present as with a certificate on your criminal convictions and /or administrative offences (either their absence or presence) issued by a competent state authority in Lithuania and/ or the country of your permanent residence, if you are not a resident of Lithuania.

In order to assess your working experience, skills, qualifications, and suitability for the role, we may also collect personal data about you from third parties, such as:

- existing STONUS Group employees who refer you for the available position with us;
- other publicly available data, such as LinkedIn account details, if you share your account data with us during the recruitment process (e.g., include it in your CV);
- recruitment agency or agent with whom we have entered into a service agreement;
- your former employer(s);
- your named referees who will provide us with references if we contact them;
- your present employer, but only if you give us consent.

7. Why We Process Your Personal Data and Our Legal Basis

Purpose of Processing	Personal Data Processed	Lawful Basis for Processing
To make sure if special migration procedures apply to your employment when you are not a citizen of Lithuania, and implement them if applicable	Identity data, including data related to the country of residence and citizenship Professional data on your qualification	Our legal obligation to implement migration laws applicable in the recruitment of non-Lithuanian
To submit an application for residence permit in Lithuania on your behalf, in case you ask us to assist you in applying for a residence permit in Lithuania in order to be employed in Lithuania	Personal data to be included in the application form for residence permit, as per application form approved by the Lithuanian migration legislation	Your consent You provide your consent for us to process your data and file the application with the Lithuanian Migration Office on your behalf. You give us your consent by your active actions when providing us with the documents and/or information required in the application procedure. If applying for residence is relevant to you, you are always free to apply for a residence permit independently without our assistance. You can also withdraw your previously given consent and from then on represent yourself independently.
To assess your suitability for the position to which you are applying with the purpose to potentially offer you work in the position	Professional data Contact details Electronic communication data Candidate assessment information Video and sound records of the dash camera in the driver training truck Computer screen video and audio Any other data you provide voluntarily on your own initiative	Our legitimate interests to ensure we run a fair and efficient recruitment process and hire the most suitable candidates possessing necessary qualifications and skills Our legitimate interest to check if the candidate applying for the position of cargo truck driver possesses sufficient cargo truck driving skills he or she claims to possess and to check whether the candidate is able to communicate properly with customers upon arrival at the loading and unloading points Legitimate interest of ours and the candidate to ensure that the assessment of the cargo truck driving test on-road is fair and transparent ensure that the evaluation of the results of proper communication is fair, fair and transparent. Your consent to for us to receive professional data about you from your present employer Your consent in relation to the data you provide voluntarily at your own initiative without our request

To be able to check the information regarding the absence of your criminal convictions or administrative offences	Data about criminal convictions and administrative offences	Our legal obligation to verify your good reputation if you are applying for a position for which good reputation relating to the absence of certain criminal convictions or certain administrative penalties is required by law
To be able to make sure that your health condition is suitable for the job for which we have decided to hire you	Health data	Our legal obligation to comply with occupational health and safety requirements making sure that your health is suitable for the position, considering the specific risk factors of that position
To ensure that the candidates we decide to employ possess necessary qualifications and hold valid certificates required by law (relevant for such jobs like cargo truck drivers, representatives of customs broker, transport managers, employees working with strictly regulated and inherently dangerous equipment or substances)	Professional data related to necessary qualifications and certification	Our legal obligation to ensure that you possess relevant qualifications and hold valid certificates required by law in order to work in the position you are applying for (when applicable)
To enter into an employment contract with you and execute it properly	Identification data Contact details Financial data	Contractual necessity
To protect property and investigate any related incidences captured in open areas in our territory or premises	CCTV recordings with the images of yours entering areas captured by CCTV	Our and other's legitimate interests to protect property and investigate the circumstance of any related incidences captured
To invite you to apply for an open position at our entities in the near future.	Any of your personal data reasonably collected during the recruitment process	Your consent If you are not selected for the role, we might ask you for your consent to let us keep your personal data after the application is over for 18 months.
To defend our rights and interests in any legal disputes involving you or other prospective, current or former employees.	Any data we hold about you as necessary for the specific dispute	Our legitimate interests to exercise our rights or defend ourselves against legal claims

8. Sharing Your Personal Data

If it is necessary for the previously described purposes, we may share your personal data with:

- our STONUS group entities where necessary to process your application;
- professional advisors (including lawyers, accountants and auditors) where necessary to receive their services;
- our third-party service providers, such as our data hosting service provider, email service provider, recruitment agency through which you have provided your application.

We may also disclose your personal data to state authorities or any other third parties where we are required to do so by law.

Except as set out in this notice, we do not disclose it to any third parties without your consent.

We are not going to transfer any of your personal data outside the territory of the European Economic Area.

9. How Long We Keep Your Personal Data

If you do not start working with us, we will keep your personal data for 2 months after the end of the application process with you so that we can effectively address any potential claims relating to the application process. If you are not selected for the role and if you provide us with your consent at our request, we will keep your personal data collected during the application process for 18 months after the end of the application.

Video recordings captured by CCTV are kept no longer than 30 days. Video and sound recordings captured by dash cameras installed inside the cabin of driver training trucks are kept until 24 hours of recording is reached in the memory card. Afterwards, the new records are automatically overwritten on top. Overall video and sound recordings are kept no longer than 30 days.

If you sign an employment contract with us, we will keep all your personal data for 2 months after the end of the application process. Beyond this term, we will hold only the personal data the processing of which is based on our legal obligation or contractual necessity, and we will keep it at least during the employment, for as long as it is required by law.

Should we need to process any of your personal data in order to defend our rights against any legal claims, we will keep such data for as long as it takes for the legal procedures to get fully completed.

10. Automated Decision-Making, Including Profiling

We do not make any decisions on your personal data solely by automated means that would cause legal or other significant effects on you. We do not perform any profiling activities with your personal data either.

11. The Rights You Have in Relation to Your Personal Data

You can exercise the following rights in relation to your personal data:

- the right to **be informed**. We have to tell you what personal data we process about you, for what purposes and how we process it, and to whom we may transfer it. The purpose of this Privacy Notice is to ensure this right;
- The right to **access** your personal data. You have the right to make a request for access to the personal data that we hold and process about you.
- The right to ask us to **correct** your personal data if you think it is incorrect, inaccurate or incomplete.
- The right to ask us to **delete** your personal data. You may ask us to delete the personal data we hold about you if you believe there is no good reason for us to hold it.
- The right to ask us to **restrict** our processing of your personal data. Restriction means stopping the processing of your personal data without deleting it. The right is subject to certain conditions.
- The right to ask us to **transfer** personal data, You may receive your personal data that you have provided to us in a structured, commonly used and computer-readable format and you may transfer that data to another controller;
- The right to **object** to us processing your personal data on the basis of our legitimate interests. You may object to the processing if your personal interests override the legitimate interests on which we rely.
- The right to **withdraw your consent** where we are processing your data relying on your previously given consent. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Please note that not all of these rights are absolute, and they may be subject to some exceptions and limitations under applicable data protection laws.

In order to exercise any of your rights, please contact our Data Protection Officer. Please note that in order to exercise your rights that require verification of your identification, we will take reasonable measures to verify your identity. For instance, we might ask you to the original of your identity document (if you arrive in person), or its copy certified by a notary (if you send us a request by regular post).

12. Your Right to Complain

If you are not satisfied with how we use your personal data or feel uncertain about this, you can raise your complaint directly to our Data Protection Officer: dpo@stonus.eu, Data Protection Officer, STONUS Group, Dvaro g. 1, Klaipėdos r., Lithuania.

If you are not happy with how we have handled your request or complaint, you also have the right to complain to the Lithuanian data protection authority, the Lithuanian Data Protection Inspectorate: Valstybinė duomenų apsaugos inspekcija, L. Sapiegos g. 17, 10312 Vilnius, Lithuania, e-mail: ada@ada.lt.