



PRIVACY NOTICE ON PROCESSING PERSONAL DATA IN AISZ FOR FUTURE, CURRENT AND FORMER EMPLOYEES

The American International School of Zagreb, Ulica Damira Tomljanovića Gavrana 3, Zagreb, Croatia ("we "or "AISZ ") wishes to be completely transparent regarding the processing of personal data according to the General Data Protection Regulation no. 679/2016 applicable in the European Union ("GDPR") and therefore, we have presented below all the information you may need on this subject matter. Please read this privacy notice to understand the data processing operations carried out by AISZ.

This Notice is designed to help you understand how we handle your data **as a job applicant, employee or former employee**. We want you to feel informed and empowered about your privacy rights and choices. Please take a moment to familiarize yourself with our practices outlined here.

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INTRODUCTION

This Notice refers to the processing of personal data collected and processed by AISZ. We consider ourselves a data controller, meaning that we decide how and why we shall collect and further process your personal data, i.e., we establish the purposes and means of processing it.

In accordance with the GDPR, the terms in this Notice have the following meaning:

"personal data "means any information relating to an identified or identifiable natural person ("data subject "); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

"processing "means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring,

storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

"**controller**" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

"**processor**" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

"**recipient**" means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be following the applicable data protection rules according to the purposes of the processing;

"**third party**" means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

"**consent of the data subject**" means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. For individuals under the age of 18, consent is provided by their parents or legal representatives. For individuals aged 18 or older, consent is provided directly by the individual.

"**personal data breach**" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. Please note that communication, whether expressly stated or reasonably assumed to achieve a specific purpose of personal data processing, may include electronic communication tools such as Google Workspace, Gmail, Chat, Google Meet, Google Drive, and other appropriate and well-established tools.

YOUR PERSONAL DATA AT AISZ AND HOW WE USE IT

IF YOU ARE APPLYING FOR A JOB WITH US

When applying for a job with AISZ, we collect and process personal data from job applicants for employment purposes. This includes gathering identification and contact information such as name, date and place of birth, e-mail, phone number, and address. Additionally, we collect details about qualifications and work experience, including resumes, education certificates, and work history. We may also collect criminal record data. Applicants may voluntarily provide additional information, such as references. If your interview is conducted on-site, your personal data is processed in our video surveillance system and entry logs as part of our security procedures.

The collected data may, therefore, fall into the following categories:

- Identification information - Name, surname, date and place of birth etc.
- Contact information - E-mail address, phone number, residence etc.
- Information on qualifications and work experience - Resume submitted by the applicant, evidence on adequate level of education (copy of diploma etc.), evidence on work experience on adequate position, training and professional development experience, certificate on work capacity etc.
- Criminal record data - Police clearance from your home of record and the country that you are currently living in
Information on non-resident applicants - Information on number of children or other family details, marital status

- Other information voluntarily submitted by the job applicant - Opinions, propositions and information submitted by job applicant to AISZ by e-mail, letter or in conversation or phone call (e.g. confidential references from former employers).
- Video recordings - . If your interview is conducted on-site, your personal data is processed in our video surveillance system and entry logs as part of our security procedures. This processing is grounded in our legitimate interests in ensuring the security of premises and property.

AISZ collects information from job applicants to choose the best person for the job. We need to assess your qualifications and experience to identify individuals best suited for available positions. This processing is grounded in our legitimate interests in ensuring a qualified workforce. We also use the collected **data for communication and status updates**, providing applicants with information on their application status, interviews, assessments, and further steps in the recruitment process. This activity is based on the performance of pre-contractual measures at the data subject's request.

If you are selected, AISZ processes your personal data **to facilitate employment arrangements**, including preparing employment contracts and facilitating the onboarding process. This processing is essential for the performance of a contract. Additionally, we ensure **compliance with legal obligations** by adhering to applicable laws and regulations related to recruitment, employment, and data protection.

With the applicant's consent, AISZ may retain personal data **for potential future employment opportunities** or talent pipelines. If your interview is conducted on-site, your personal data is processed in our video surveillance system and entry logs **as part of our security procedures**. This processing is grounded in our legitimate interests in ensuring the security of premises and property.

WHEN YOU BECOME OUR EMPLOYEE

We process personal data of our employees. That includes information obtained directly from the employee through onboarding forms, HR portals, meetings, and provided certificates. We also collect data from external sources, such as references from previous employers or information available on recruitment platforms, and data obtained by legitimate actions of AISZ itself or its data processors, such as through employee evaluations, accessing the IT systems, video surveillance systems, and access control measures.

Personal data collected may include **identification information** such as name, surname, personal identification number, birth details, citizenship, residence, and license plate number; **contact information** including e-mail address, phone number, and emergency contact details; **details regarding qualifications and work experiences** such as education, skills, resume details, and certificates; **employment-related information** including work experience, insurance details, family support, work hours, and performance data; **data necessary for salary calculation and payment** like bank account details, wage components, and payout details; information concerning non-resident employees such as place of residence family details, marital status, visa, photo (needed for visa application) and passport copy, employment position ; **other data** voluntarily submitted by the employee; **medical and health data**; and **images and video recordings** including individual and group photos, as well as video recordings obtained through surveillance. **AISZ processes employee data for various purposes, which include:**

- **Compliance with legal obligations** such as following employment regulations, maintaining records, and calculating salaries.;
- **Human resources management tasks**, including record-keeping, managing working hours, and employee evaluations;
- Ensuring timely and accurate **salary payments and benefits**;
- **Realization of employee rights** related to employment;
- **Business organization and management** for effective workflow and organizational structure;
- **Health, security, and integrity protection** to preserve employee well-being and safety;

- **Emergency preparedness** for immediate response and notification in emergencies;
- **Improvement of the ICT environment** to enhance security and access control to IT systems;
- **Protection of persons and property** against security threats and property damage;
- **Promotional activities** such as publishing content for promotional purposes with employee consent;
- **To contact you or send you newsletters** after your employment ends, but only with your consent.

AISZ processes this data based on legal bases including the performance of the employment contract, compliance with legal obligations, the legitimate interests pursued by AISZ, consent obtained from the employees, and the protection of vital interests of the employees or other individuals.

HOW LONG DO WE KEEP YOUR PERSONAL DATA

AISZ keeps your information only as long as needed. This follows legal requirements and our internal retention policies, which are available upon request. We delete or destroy your information securely when it's no longer needed. If processing is based on consent, data is kept until the consent is withdrawn or for the necessary duration. For example, job applicants who are not employed can request a return of their submitted documentation. Still, with their consent, data may be kept for up to one year for future employment consideration. In some instances, employee data may be retained permanently, as per our legal obligations. We maintain the accuracy and updates of your information based on the details provided directly by you, the data subject.

WHO HAS ACCESS TO YOUR PERSONAL DATA

Access to applicant's personal data can be granted to AISZ's employees who participate in the recruitment process and who have limited rights to access and process personal data for performing their work tasks, especially those employed in the HR department. Once employed, access to personal data may be extended to other AISZ personnel to perform necessary work tasks, facilitate organizational efficiency and workflow, ensure safety and integrity, and fulfill our legal and contractual obligations.

All employees of AISZ who are authorized to access or otherwise process personal data are required to maintain their confidentiality and act in accordance with privacy notices, policies, procedures, and other general acts and contractual obligations of AISZ.

To the extent in which it is necessary and allowed under regulations, to accomplish purposes for which personal data have been collected and/or processed, AISZ may disclose it to third parties such as:

- service providers, who provide us with certain services on the basis of special contracts, which may include the processing of personal data of suppliers and business partners of AISZ, e.g. providers of accounting, legal or IT services,
- government and public authorities, such as Ministry of Internal Affairs, Croatian Employment Institute, court authorities or private legal entities, when AISZ is obliged to deliver personal data based on statutory obligations or when this is necessary for AISZ to protect its rights and interests.

In some cases, personal data may be transferred to countries which are not members of the European Union and European Economic Area,, which may have different and potentially lower standards of personal data protection than those prescribed in the Republic of Croatia.

In such cases, AISZ shall undertake appropriate protective measures to ensure adequate protection of your personal data. Such measures include the conclusion of the agreements in accordance with forms the European Commission has adopted for such purposes (using so-called standard contractual clauses for transferring personal data abroad).

HOW DO WE PROTECT YOUR PERSONAL DATA

To protect personal data, AISZ undertakes appropriate protective measures which are in accordance with applicable regulations on the protection of privacy and personal data. This also includes requests towards AISZ's service providers to take appropriate measures to protect the confidentiality and safety of processed personal data. In its business, AISZ has implemented technical, physical, and organizational measures to protect personal data from accidental destruction, loss, damage, alteration, unauthorized disclosure or access, and all other forms of illegal and/or excessive processing.

WHAT ARE YOUR RIGHTS AS A DATA SUBJECT

In terms of personal data protection, any individual whose data we process (data subject) possesses the following rights:

- right to access their personal data, i.e. the right to obtain from the controller confirmation as to whether personal data concerning them are being processed,
- right to request access to personal data and information on processing as well as a copy of personal data being processed;
- right to rectification of inaccurate personal data and right to have incomplete personal data completed;
- right to the erasure of personal data, especially if such data are no longer necessary in relation to purposes for which they were collected or otherwise processed, if the personal data have been unlawfully processed, if the personal data must be erased to comply with a legal obligation or if the consent has been withdrawn;
- right to restriction of processing;
- right to object to data processing;
- right to complain to the Croatian Personal Data Protection Agency.

AISZ shall undertake all measures to enable data subjects to exercise the above mentioned rights; however, in some instances, the exercise of these rights can be limited or excluded.

HOW TO CONTACT US ON PERSONAL DATA PROTECTION

For any information, feel free to contact AISZ or AISZ's data protection officer by sending message to the following e-mail address: dpo@aisz.hr or contacting the phone number +385 1 7999 300.

AMENDMENTS TO THE NOTICE AND CONSOLIDATED VERSION

This Notice shall apply as of May 1, 2024, and is subject to occasional amendments. The last version of this Notice, which shall always be relevant for processing personal data in AISZ, is available on AISZ website.