

CANDIDATES PRIVACY POLICY

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1. Purpose of the Privacy Policy

The purpose of this Candidates Privacy Policy (herein referred to as "Privacy Policy") is to explain how **ERGO Insurance SE** and its branches and **ERGO Life Insurance SE** and its branches (herein referred to as "ERGO" or "we") process personal data within the context of ERGO recruitment process, and to inform you about your rights as a data subject in relation to your personal data processing.

This Privacy Policy applies to you:

- as a candidate, for instance, when you visit our career site (portal) used for our recruitment process and when you apply for a position;
- when you create a profile or connect with us to receive information about future job opportunities;
- when we identify you as a potential candidate from public professional sources;
- when you are referred to us by employees or partners;
- when you act as a referee for a candidate.

This Privacy Policy covers data processing regardless of the form and/or environment in which you provide your personal data, for example, electronically or in paper format, via e-mail, phone, career site (portal) etc.

ERGO protects your personal data in accordance with applicable data protection laws and regulations, incl. Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), as well as this Privacy Policy.

ERGO takes necessary technical and organisational measures to ensure appropriate security of personal data, it includes training of employees involved in personal data processing, security risk and data protection impact assessment and monitoring, management and control of access rights; and other organisational, physical and information technology security measures.

2. Information on your personal data controller

Depending on the job vacancy for which you are applying, e.g., whether you will have cooperation with one or more ERGO companies, your data controller is ERGO company/branch that has announced the relevant vacancy:

- **ERGO Insurance SE** (registered in the commercial register of the Republic of Estonia, registry code 10017013, registered office: Veskiposti 2/1, Tallinn, Estonia, email: info@ergo.ee) and/or
- its branch in Latvia - **ERGO Insurance SE Latvian Branch** (registered in the Commercial Register of the Register of Enterprises of the Republic of Latvia, registry code 40103599913, registered office: Skanstes iela 50, Riga, LV-1013, Latvia, e-mail: info@ergo.lv) and/or
- its branch in Lithuania - **ERGO Insurance SE Lithuanian Branch** (registered in the State Enterprise Centre of Registers of Republic of Lithuania, registry code 302912288, registered office: Geležinio Vilko g. 6A, LT-03150 Vilnius, Lithuania, email: info@ergo.lt) and/or
- **ERGO Life Insurance SE** (registered in the State Enterprise Centre of Registers of Republic of Lithuania, registry code 110707135, registered office: Geležinio Vilko g. 6A, LT-03507 Vilnius, Lithuania, email: info@ergo.lt) and/or
- its branch in Latvia - **ERGO Life Insurance SE Latvian Branch** (registered in the Commercial Register of the Register of Enterprises of the Republic of Latvia, registry code 40103336441, registered office: Skanstes iela 50, Riga, LV-1013, Latvia, e-mail: info@ergo.lv) and/or

- its branch in Estonia - **ERGO Life Insurance SE Estonian branch** (registered in the commercial register of the Republic of Estonia, registry code 12025488, registered office: Veskiposti 2/1, Tallinn, Estonia, email: info@ergo.ee).

ERGO Insurance SE and its branches and ERGO Life Insurance SE and its branches act as a separate independent data controller. In certain cases, ERGO Insurance SE and its branches and ERGO Life Insurance SE and its branches may cooperate, for example, if the job vacancy involves cooperation with several ERGO companies, employment in ERGO legal entities or regarding HR process analysis and development, security etc. We ensure the processing of your personal data in accordance with applicable laws and regulations, including with respect to the exercise of the rights of data subjects, and the implementation of technical and organisational security measures. You may exercise your rights in respect of and against each of the controllers. For easier communication, please contact the contact point – the ERGO company/branch that has announced the relevant vacancy.

3. Categories of personal data processed

The type and amount of personal data processed by ERGO may vary depending on your interaction with us. We process only the minimum necessary personal data for the specific purpose. Main categories of personal data processed by ERGO, where applicable:

- **identification data**, e.g., name, surname, where applicable - date of birth or personal code;
- **contact information**, e.g., address, email address, telephone number;
- **application and professional data**, e.g., CV, cover letter, work experience, education, qualifications, certificates, skills, salary expectations, work samples and other information you choose to provide;
- **recruitment process data**, e.g., interview notes, internal evaluations, assessments, test results and communications related to recruitment;
- **feedback data**, e.g., if you choose to participate in our recruitment survey or you provide us with your feedback in other format;
- **reference data**, e.g., contact details of referees and references provided by them;
- **public professional information**, e.g., information from publicly available professional sources (e.g., LinkedIn);
- **technical and usage data**, e.g. career site (portal) visitor data, IT system access and usage data, incl. sent requests and received notifications, IP address, browser and device information, session activity and usage statistics collected through cookies and similar technologies.

When you visit our website or apply directly via our career site (portal), information about the usage may be stored as cookies. We may use cookies, e.g., to improve the usage of our website and career site (portal) and to collect statistics. Non-essential cookies are processed based on your consent and you have rights to disable the use of non-essential cookies by changing cookies settings at any time. Please see also our Cookie policy available on our website/career site (portal);

- **audio-visual data**, e.g., photo (if added), online recruitment meetings.
If you visit our premises - video surveillance (CCTV) data may be processed for security reasons and stored for a limited period of time based on our legitimate interests. Regarding video surveillance (CCTV) we additionally provide information through CCTV notice;
- **special categories of personal data**, e.g., health data, data related to criminal record – when there is a legal basis for this;
- **other specific data** – for instance, checking creditworthiness of certain managerial positions candidates (in Estonia) – when there is a legal basis for this;
- **data for fulfilment of legal obligations** – necessary personal data to be compliant with applicable legal obligations, e.g., identification data etc.;
- **data for management of legal claims** - personal data relevant to specific situation processed by us at that moment, e.g., identification data etc.;
- in some cases, depending on the type of position, we may ask you for additional information, for example, information about existence of driver's license etc.

We ask candidates not to provide unnecessary information or sensitive personal data unless specifically requested.

4. Legal basis for personal data processing

Mainly, ERGO process personal data on the following legal basis:

- **legitimate interests**, incl. legitimate interest in recruiting suitable employees;
- **performance of a contract, incl. pre-contractual cooperation** - necessary steps prior to entering into an employment contract within the context of particular job position;
- **compliance with legal obligations** – to fulfil the duties that ERGO is required to perform in binding external regulations;
- **consent** provided by you as a data subject, e.g., regarding future job opportunities. Where processing is based on consent, you may withdraw your consent at any time.

5. Purposes of personal data processing

Depending on our cooperation one or several purposes may be applied. Mainly, ERGO processes personal data for the following purposes:

5.1 to manage and conduct recruitment processes;

We may process, for instance, identification data; contact information; application and professional data; recruitment process data; public professional information; audio-visual data; technical and usage data.

Legal basis for personal data processing: legitimate interest; performance of a contract, incl. pre-contractual cooperation.

5.2 to evaluate candidate suitability, incl. conducting interviews and assessments and verifying candidates' qualifications and references;

We have the right to verify the accuracy of the data provided by the candidate and assess the candidate's suitability for the applied position. In specific cases, additional suitability checks might be required for specific positions, e.g., regarding fit and proper checks, existence of conflict of interest, financial distress etc.

We may process, for instance, identification data; application and professional data; recruitment process data; reference data; public professional information; special categories of personal data or other specific data; data for fulfilment of legal obligations.

Where applicable, we may process personal data of referees (third persons) shared with us. For instance, name, contact information, or job relationship type can be processed for this purpose. The candidate is obliged to inform referees in advance before data are shared with ERGO as their data, including contact details will be used to contact them and ask for work-related feedback about the candidate.

Legal basis for personal data processing: legitimate interest; performance of a contract, incl. pre-contractual cooperation; compliance with legal obligations; where applicable - consent provided by you as a data subject.

5.3 to communicate with candidates;

We may process, for instance, identification data; contact information; technical and usage data.

Legal basis for personal data processing: legitimate interest.

5.4 to maintain a talent pool for future job opportunities;

We may process your personal data for future job opportunities when you choose to connect to our career site (portal), even if your application is not currently relevant to a specific vacant position, but you want to be informed about future positions that correspond to your professional competence.

We may also process your data when you choose to be informed about future job opportunities within other recruitment processes if employment relations are not being established as a result of the current recruitment process and if a new vacancy arises that matches your qualification.

We may process, for instance, identification data; contact information; application and professional data; recruitment process data; technical and usage data necessary for management of future job opportunities.

Legal basis for personal data processing: consent provided by you as a data subject.

5.5 to manage candidate personal data to establish employment, incl. necessary steps within the recruitment process to conclude employment contract;

We may process, for instance, identification data; contact information; application and professional data; recruitment process data; special categories of personal data or other specific data; data for fulfilment of legal obligations.

Legal basis for personal data processing: performance of a contract, incl. pre-contractual cooperation; compliance with legal obligations; legitimate interest.

5.6 to operate, maintain and improve our career site (portal) and recruitment process;

We may process, for instance, candidate data and recruitment process data, incl. recruitment status data, technical and usage data received via career site (portal) etc. to improve the recruitment process, incl. candidates experience. For instance, we may process identification data, contact information to contact a candidate and get candidate's feedback and we may process candidates' feedback data received via surveys or via other formats to evaluate candidates' satisfaction and to process statistics to improve recruitment process and/or career site (portal). Participation in our recruitment surveys is at the candidate's own free choice.

Legal basis for personal data processing: legitimate interest, consent provided by you as a data subject, e.g., when you choose to give your feedback.

5.7 to fulfil legal obligations and manage compliance, incl. internal controls, audits;

We may process data for fulfilment of legal obligations – necessary personal data to be compliant with applicable legal obligations, e.g., identification data, etc.

If you do not provide personal data that is necessary to be compliant with applicable legal obligations, we may not be able to perform certain processing activities. In such case we may not be able to continue our cooperation.

Legal basis for personal data processing: legal obligations; legitimate interests

5.8 to protect and enforce legal rights and interests;

We may process data for management of legal claims - personal data relevant to specific situation processed by us at that moment, e.g., identification data etc.; incl. to establish, exercise and defend legal claims, handle complaints and requests, as well as to retain information for this purpose.

Legal basis for personal data processing: legitimate interest.

6. Sources of personal data

We may collect and obtain personal data from the following sources:

- directly from you. We may process personal data you provide to us directly or indirectly, e.g., as part of our communication or when you use IT systems, or visit our career site (portal) etc.;
- from recruitment, incl. CVs platforms or agencies;
If you add your CV addressed to us in external CVs databases/platforms, please read their privacy policy as they may act as separate controllers.
- from public professional sources, e.g., LinkedIn;
- from referees you provide us;
- from employees or partners who refer you;
- personal data exchanged within ERGO group companies and branches, e.g., if you have cooperation with several ERGO group companies or it is necessary for our legitimate interests;
- from external sources, e.g., public websites, registers, databases etc. - if there is a legal basis for this;
- If you connect to our career site (portal) from external sources, e.g., LinkedIn we may receive your information related to your social media account and may process it during the recruitment process. You can choose to apply directly via our career site (portal).

7. Sharing of personal data

Access to your personal data is provided to employees who need it to perform their work duties. We do not share more personal data than necessary for the particular purpose of processing. We may share your personal data with:

- service providers (our data processors) that provide us with services, e.g., recruitment management services, courier service providers, IT system development and maintenance services; cloud services or services of other technical solutions etc. Our data processors may only process personal data according to our instructions and cooperation contracts. ERGO uses service providers that provide sufficient assurance that appropriate technical and organisational measures will be put in place.

For instance, we may manage our recruitment activities, incl. candidate selection and our as an employer branding activities through our career site (portal) operated by Teamtailor AB, which acts as our data processor.

- ERGO group companies and branches, e.g., when certain tasks are performed in a centralised manner or if you have cooperation with several ERGO group companies, or it is necessary for our legitimate interests;
- referees - providers of feedback concerning the previous professional career of the candidate;
- external consultants, e.g., auditors, law firms or other independent consultants, e.g., when it is required by laws or in order to protect our legitimate interests;
- state institutions, incl. supervisory authorities, courts, law enforcement authorities etc., for instance, upon their request or when it is required by laws, or when it is necessary to protect our interests;
- third parties maintaining registers, e.g., on criminal record data etc. which contain personal data or through which personal data is shared - if there is a legal basis for this;
- parties involved in legal proceedings;
- third parties in connection with mergers or acquisitions;

Recipients that are not our data processors, may act as independent data controllers and their privacy policy may apply. You have rights to contact them directly.

8. Geographic area of personal data processing

Your personal data are mainly processed within the European Union and the European Economic Area (EU/EEA). However, please be aware that some service providers, e.g., that provide IT services, may be located outside the EU/EEA; therefore, your personal data may be processed outside the EU/EEA. When your data is processed outside the EU/EEA, we take necessary measures to ensure that there are sufficient technical and organizational safeguards in place in order to ensure processing of personal data in a secure way. Regarding transfer of personal data to a country outside the EU/EEA, we may use, e.g., an Adequacy [Decision](#), Standard Contractual [Clauses](#), Binding Corporate Rules or other transfer mechanisms provided for in General Data Protection Regulation.

You have rights to receive information about the country where your personal data is processed and the introduced personal data safeguards by providing written request to us. Please see our contact details below.

9. Personal data storage period

We store your personal data only for as long as necessary to achieve a specific purpose of processing. For instance:

If you are not selected and do not consent to future job opportunities, your personal data will be deleted within 3 (three) months after the end of the particular recruitment process. Data that we do not need for further recruitment process, we may delete immediately.

If you consent for future job opportunities, in general, your data will be stored for 12 (twelve) months.

If the processing takes place based on your consent, personal data based on your consent will be processed for as long as your consent is in effect and not revoked.

Data may be retained longer where required by law, or where necessary to establish, exercise or defend legal claims.

After the expiry of the data processing period, we will immediately take steps to erase or anonymise or, if it is in paper format, securely destroy it. Depending on the amount and type of data, this may take some time to complete it technically. We ensure personal data protection throughout all its lifecycle.

10. Contact details for questions related to your personal data processing

You can also use functionality provided by our career site (portal), by logging into your candidate profile, for instance, by updating your information directly in career site (portal), by withdrawing consent etc.; or you can contact us directly:

- **in Estonia:** Data Protection Officer: dpo@ergo.ee;
Client service: phone: 610 6500, email: info@ergo.ee;
ERGO Insurance SE and ERGO Life Insurance SE Estonian branch registered office: Veskiposti 2/1, Tallinn, Estonia;
- **in Latvia:** Data Protection Officer: personasdati@ergo.lv;

Client service: phone: 22585500, email: info@ergo.lv;
ERGO Insurance SE Latvian Branch and ERGO Life Insurance SE Latvian Branch registered office:
Skanstes iela 50, Riga, LV-1013, Latvia;

- **in Lithuania:** Data Protection Officer: asmensduomenys@ergo.lt;
Client service: phone: 1887; email: info@ergo.lt;
ERGO Life Insurance SE and ERGO Insurance SE Lithuanian Branch registered office: Geležinio
Vilko g. 6A, LT-03507 Vilnius, Lithuania.

Using the contact details of the Data Protection Officer or contact details of your data controller with a written submission, for instance, that is personally signed or electronically signed with a secure electronic signature or in any other way that makes it possible to identify you as a data subject, you may ask any questions regarding your personal data processing. We will respond to you without undue delay and in any event within one month of receiving the request, if we are able to identify you to the extent necessary within the scope of the request. Please be aware that if a data subject does not provide us with the necessary identification information, the data subject could fail to receive important information about the processing of their personal data.

If you have any questions, please first contact ERGO with your request. You have the option to submit an application to the ERGO Data Protection Officer or to write the ERGO registered office.

If no solution can be found, you have the right to contact and lodge a complaint with ERGO supervisory authority for personal data protection. If the actions referred to in the data subject's request are not carried out, according to applicable laws, you also have the right to seek a judicial remedy.

- Contact details of the supervisory authority for personal data protection are available here: in Estonia: Data Protection Inspectorate <https://www.aki.ee/>, in Latvia: Data State Inspectorate <https://www.dvi.gov.lv/>, in Lithuania: State Data Protection Inspectorate <https://vdai.lrv.lt/>.

11. Your rights as a data subject

If you have any questions or requests: please contact us. Please see contact details above.

You have a right to:

- **withdraw your consent** at any time. Please be aware that withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. You can easily withdraw your consent by contacting us;
- **access your personal data** and get information about their processing (right of access by the data subject);
- **request corrections** in your personal data if these are inaccurate, incomplete or false (right to rectification). If there are any changes to your personal data processed by us, you are obliged to inform us as soon as possible, so we can make necessary changes and updates;
- request ERGO **to delete your personal data** ("right to be forgotten", right to erasure). ERGO will delete your personal data at your request (e.g., if the processing is based on your consent, and you withdraw it). However, this provision does not apply if ERGO processes the personal data, whose deletion you request, based on other legal grounds, such as the fulfilment of contractual or legal requirements;
- exercise **your right to the restriction of processing** where the circumstances provided for in the laws and regulations exist (right to the restriction of processing);
- **request a copy of your personal data** in electronic format and the right to transfer this data to another controller, insofar as this is provided for by the laws and regulations and where this is technically feasible (right to data portability);
- object, on grounds relating to your particular situation, **to the processing of your personal data based on legitimate interest** or the public interest or in the exercise of official authority vested in the controller (right to object);

However, we may continue to process personal data if we have compelling legitimate grounds for the processing which override the interests, rights and freedoms of you as a data subject or for the establishment, exercise or defence of legal claims.

- in general, we do not process personal data of candidates within the context of automated individual decision-making. Where applicable - data subjects have rights to **request a review of an automated**

- decision on an individual basis** with the assistance of specialists (automated individual decision-making, including profiling);
- You have a **right to lodge a complaint with a supervisory authority for personal data processing**.

12. Availability and revision of the Privacy Policy

ERGO regularly revises and updates this Privacy Policy. We may update this Privacy Policy, for instance, when we need to process personal data for additional purpose or if it's necessary to do so in order to comply with applicable laws.

ERGO publishes the current version of the Privacy Policy on its career site (portal) and websites: in Estonia: <https://ergo.ee/> in Latvia: <https://www.ergo.lv/lv> in Lithuania: <https://ergo.lt/>

Depending on the solution available on career site (portal), for the convenience of candidates, automatic translation of information into the chosen language may be available in certain sections of the career site (portal).

If this Privacy Policy is available into different languages, interpretation of the text that is in accordance with applicable laws shall prevail in the case of conflict.

Current version of the Privacy Policy: 27.02.2026