**Coca-Cola HBC Austria Recruitment Privacy Notice**

By expressing interest to join the Coca-Cola HBC Austrian team, you will be providing us with certain personal data about yourself. Coca-Cola HBC AG and its subsidiaries and affiliates (within this policy and within the opt-in notice “CCHBC”, “CCHBC Group”, 'our', 'us', 'we') are committed to respect your privacy and to manage your personal data fairly and safely. With this Privacy Notice, we want to inform you why and how we are processing your personal data in the context of the recruitment process and within the respective digital recruitment platforms. It applies to individuals who apply to work for or register in CCHBC Talent Network, attend a recruitment event, undertake an evaluation with CCHBC or participate in other recruitment processes.

Unless otherwise indicated, Coca-Cola HBC Austria is the entity responsible or “data controller” for the processing of your personal data. If you are applying for a job with one of the other CCHBC Group companies, then that CCHBC company is also a data controller.

**Personal data we collect**

We may collect personal data directly from you, from third parties or public sources, as well as automatically, such as through your use of our recruitment platforms. In this Privacy Notice, “personal data” means any information relating to an identified or identifiable individual. Examples of personal data included: name, email address, IP address, and phone number.

We process your personal data in order to assess your application prior to entering into an employment contract with us and pursuant to laws to which CCHBC is subject (e.g., in relation to equal opportunities). If you are unable to provide us with the information requested, we are unable to assess your appropriateness for the job applied for or to communicate with you.

If we require further personal data from you, we will let you know whether this is in order to fulfil your contract or as a consequence of a statutory obligation and we will let you know what the consequences would be if you failed to provide this to us and any risks associated with the use of the Personal Data by us.

**Personal data we collect directly from you or you provide to a recruitment agency on our behalf**

1. **Identification information:** Title, Fist Name, Last Name, data of birth, language, gender, valid driving license, national insurance or other identification number, and your visa, passport or permission to work documentation
2. **Contact details:** address, telephone, email address and mail address
3. **Job application details:** CV or résumé, application form details, interview notes, certifications, diplomas, professional qualifications, and professional experience, language skills, desired salary, start date/notice period to be considered, tenure and your picture if you provide it to us knowingly and voluntarily
4. **Interview and Assessment information:**
	* Video and audio recordings of online interviews, if requested
	* Interview scheduling information
	* Results of leadership and functional skills tests
	* Results of leadership skills behavior-based assessments (Role plays and In-trays)
	* Results of gamified assessments, data from your interaction with the assessment and analysis of your responses against the success criteria (job fit)
5. **Recruitment surveys:** We may collect information about our recruitment process, such as how you found out about the job and your visits to recruitment events such as job fairs.
6. **Special Categories,** in case applicable to your applied job position**:**
	* details of your race, gender, national or ethnic background, religious or community background, to ensure meaningful equal opportunity monitoring and reporting
	* disabilities you may have and whether you have been long term unemployed strictly for the purposes of monitoring compliance with anti-discrimination legislation, our policies and our legal duties under anti-discrimination legislation.
	* the results of criminal records or financial probity checks or other independent searches (and where we do so you will be asked to consent to such collection and use before we or our agents undertake the search) to assess your suitability for the position.

**Personal data we collect automatically**

**Website usage information**. When you visit our digital recruitment platforms, we collect certain information about your use of the website, including the hostname and IP address of your device, your browser type and version, device type, unique device identification numbers, broad geographic location (e.g. country or city-level location) your operating system, the website that referred you to us, the pages you visit on our recruitment platforms and the time and duration of your visit.

**Cookies**. We may use cookies and similar technologies to collect personal data. Cookies are small data files placed on your computer or mobile device when you visit a website or use an online service. For more information about our use of cookies, please see the respective Recruitment Cookie Notice and the related Cookie Preference Center.

**Personal data we collect from third parties**

**Professional social media**: If you include a professional social media link or identifier in your application, we may retrieve information about your professional social media presence from such social media sites, like LinkedIn and Xing.

**Background checks**: We may collect and process information from third parties, including criminal records, to verify information you have provided to us, and to perform background checks, in case applicable to your applied job position

**Personal data we collect from public sources**

**Personal information publicly available:** on contact information, social links, professional qualifications, experience, and education

**Purposes and Legal Basis for processing Personal Data:**

1. **Evaluating job applications:** Registering your application for a job with us and, if this application triggers our selection procedure, defining your professional summary to assess your job application in view of a potential recruitment, including conducting the interview process, the evaluation of individual skills and competencies, managing the candidate and enhancing, validating, and updating applicant data to ensure validity and completeness.
2. **Background screening:** Screening of educational and professional background prior to and during employment.
3. **Contacting you:** for information required for entering an employment contract with you
4. **To provide you with our IT services** though our 3rd parties platforms

**Legal Basis:**

* The fulfillment of the recruitment process execution authorized by your acceptance of the Recruitment contract and on a later stage, an employment contract (article 6 (1) (b) GDPR).

* To fulfil our legal obligation to comply with Tax and Accounting obligations (article 6 (1) (c) GDPR).
* We are authorized by law to use certain special categories of data, or data related to criminal offences, for example to conduct background checks (article 6 (1) (c) GDPR).
* CCHBC has a legitimate interest according to article 6 (1) (f) GDPR in using the personal data learning about the effectiveness of our recruitment efforts and to assess your application prior to entering an employment contract with us. Also, if your application is successful, the data collected during the application period will be retained and its processing will be subject to the CCHBC Employee Privacy Notice. More specifically, the application data, including your personal data provided in your CV may be processed for further employment purposes, e.g., so that CCHBC can fully identify and draw upon the experience, industry and professional knowledge, skills and talents employed in the Company.

**To maintain an up-to-date candidate database:** Maintaining a database of job candidates in order to be able to contact potential candidates if any future job opportunities match their profile. Data enrichment is a process used to enhance, validate, and update candidate’s contact data to ensure accuracy and completeness. Data enrichment may be used for certain key categories of personal information that individuals make publicly available on the web.

**Legal Basis:** Your explicit consent to be considered for other positions and to join **Coca-Cola HBC Talent Network (article 6 (1) (a) GDPR)**

**Automatic Decision Making**

We do not practice automatic decision making for your recruitment process. We short list applicants using a manual selection process, considering appropriate experience and skills for the job.

**How we disclose Personal Data**

We may share your data with other CCHBC group companies for the purpose of your recruitment selection and if you are taken on, as part of your employment. We limit the personal data provided to that which is reasonably necessary for them to perform their functions, and we require them to agree to maintain the confidentiality of such information.

* **CCHBC People and Culture**. We may disclose details about your application to HR and management teams of other members of the CCHBC Group, for example employees who are involved in our recruitment and selection processes and relevant managers.
* **CCHBC Talent Acquisition Team.** We may disclose your personal data to talent management teams and to
* **CCHBC People and Services Team (BSO)** that provide administration services for your recruitment to the Talent Acquisition Team
* **3rd parties.** We may disclose your personal data to:
	+ - **IT Service providers.**  third party service providers who provide us with hosting, maintenance, and other services. These third parties may have access to or process personal data about you as part of providing those services for us,
		- **Providers** conducting pre-employment checks,
		- **Assessment companies or entities providing online interviewing services,**
		- **Recruitment agencies** who, from time to time, assist us in our recruitment and selection processes.
		- **Compliance with laws and law enforcement.** We reserve the right to disclose your personal data as required by law or when we believe that disclosure is necessary to protect the security or integrity of our recruitment platforms, or to protect the legitimate interests, rights, property, or safety of CCHBC, its employees or others, or to comply with a judicial proceeding, court order, or governmental or regulatory request or any other legal process served on us.

**International data transfers**

We hold your personal data principally in the country in which you apply for a role. However, it is sometimes necessary for us to provide details about your application to our other CCHBC Group companies situated outside the European Economic Area for the purposes of your selection. When we do so, we will ensure that such transfers ensure that an appropriate level of protection is given to the personal data (and we use EU approved “Model Clauses” where appropriate in order to ensure this).

For more information about the transfers described above and the adequate safeguards we use to protect such transfers, you may contact us through the contact information set forth below.

**Retention periods**

We take measures to delete your personal data or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this data for a longer period. When determining the retention period, we take into account various criteria, such as the position you applied for, whether the application was successful, the nature and length of our relationship with you, expected future job openings matching your profile, mandatory retention periods provided by law and the relevant statute of limitations.

If your application is unsuccessful, we will generally retain your application for a period of up to 7 months or if you have provided consent to us so to maintain your personal data for extended period.

 If you have allowed us to consider you for other job opportunities or have joined our Talent Network, we will retain your personal information for a period of 36 months

For more information about our retention of your application, you may contact us through the contact information set forth below.

**Your rights and choices**

If you are based in the EU, or we process your personal data in the EU, you have certain rights in relation to the data we collect about you:

* **Subject Access**: You have a right to be provided with access to any data held about you by CCHBC generally within 1 month of your request.
* **Rectification**: You can ask us to have inaccurate personal data amended.
* **Erasure**: You can ask us to erase personal data in certain circumstances pursuant to Art. 17 GDPR and we will take reasonable steps to inform other controllers that are processing the personal data that you have requested the erasure of any links to, copies or replication of it.
* **Withdrawal of consent**: You can withdraw any consents to processing that you have given us and prevent further processing if there is no other ground under which CCHBC can process your personal data.
* **Restriction**: You can require certain personal data to be marked as restricted whilst complaints are resolved and also restrict processing in certain other circumstances.
* **Portability**: You can ask us to transmit the personal data that we hold about you to a third party electronically.
* **Raise a complaint**: You can raise a complaint about our processing with the data directly to the Austrian Data Protection Authority, Barichgasse 40-42, 1030 Vienna.

**Your contact for any queries**

CCHBC has a designated Data Protection Officer who should be contacted if you have any queries regarding the interpretation of this notice. The contact details are set out below:

* Data Protection Officer: Nassos Stylianos
* Location: Coca‑Cola HBC Services MEPE, 9, Fragoklissias Street, Maroussi 151 25, Greece
* Email: **DataProtectionOffice@cchellenic.com**

**Changes to this Privacy notice**

We may modify or amend this Privacy Notice from time to time. Any changes we may make to this Privacy Notice in the future will be posted on this page. To let you know when we make changes to this Privacy Notice, we will amend the revision date at the top of this page. The new modified or amended Privacy Notice will apply from that revision date. Please check back periodically to see changes and additions.