



Dolmen Hotel

Career Policy

Approved by:

Mr. Alex Pace

Doc Number: DH/018/007

Rev: [01]

<i>AUTHOR</i>	<i>REVISED SECTION/PARAGRAPH</i>	<i>REVIEWED BY</i>	<i>VERSION DATE</i>
Shane Mercieca Claude Camilleri	N/A	GVZH Advocates	31/07/2018



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1. Purpose of this Policy

This Privacy Policy (the “Policy”) sets out and describes the way in which Dolmen Hotel (hereinafter also the “Company”; “we”; “us”; “our”) collects and processes the personal information and data of the applicant to a vacancy (hereinafter also “Applicant”; “you”; “your”) provides to us.

We are committed to protecting your privacy and we will only collect and process any personal information about you in accordance with this policy. If you do not agree with the terms of this policy, please do not provide us with your personal information.

1. Data Controller

The Controller of your personal data is Dolmen Complex Ltd., St. Paul’s Bay, SPB 2402, Qawra, Malta. Telephone Number: 00356 2355 2355; email: dp@dolmen.com.mt.

2. Grounds and Purposes of the Processing

As your prospective Employer we need to collect and process information about you to manage your application and the recruitment process and to protect our legal position in the event of disputes and / or legal proceedings.

We only collect and process data and information that you, voluntarily, personally or through a third-party acting on your behalf (e.g. a recruitment agency), provide to us or which derive from them (e.g. notes taken during an interview).

Where we intend to process your data for one or more lawful purposes other than which it was collected, we will provide you with information on such purposes and any other relevant details. In the event that any further purpose requires your consent, we will refrain from the processing until we have explicitly obtained a consent.

3. Categories of Personal Data we process

Application to a Vacancy

By applying to any of the vacancies advertised by us, whether directly or indirectly (e.g. through a Recruitment Agency) and irrespective of whether the advertisement is published on any of our websites or any third – party websites (e.g. a Recruiter Agency’s) or by submitting to us any relating contents, whether or not solicited, (e.g. a speculative application) you provide us with a number of personal information (“Application Data”).

Application Data includes, but are not limited to your personal and contact details; your employment or education history and any other personal information submitted to us such as a cover letter, a resume, a reference or recommendation letter; correspondence with or about you, for example the acknowledgement of



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receipt of your application, a feed-back on its status, an email to the Recruitment Agency that referred you to us notifying the outcome of an interview.

4. Data Security and Disclosure

We will take all reasonable steps to ensure that your information is kept secure and protected to the highest possible standards. We have appropriate safeguards and trained personnel to protect your personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

The Company may share your personal data with the parent Companies of the Group when it is necessary to better assess your application, to comply with our legal and regulatory requirements and to facilitate the exercise of your rights as data subject.

Although your Recruitment Data are mainly processed by our Human Resource Personnel, your information may be disclosed, in accordance with the nature of the vacancy and on a strict need-to-know basis, to line managers and to our senior management.

We will not release your personal information to any third-party nor will we transfer it to any third-Country or international organisations.

5. Retention Period

Application Data are stored and retained only for the time that is strictly necessary to the recruitment process and to the other purposes stated in this Policy, however, where you have given your consent, Recruitment Data pertaining to unsuccessful applications may be retained up to 6 months following the end of the recruitment process and processed in the event that a new, relevant vacancy arises.

On the other hand, following a successful application, we may still keep all Application Data and we will process and retain it in accordance with our Employees' Privacy Policy.

6. Your Rights

In respect of any of your personal data collected and processed by us in accordance with this Policy, at any time you have the right to:

- Access your personal data and periodically obtain a free of charge copy of them;
- Rectify your personal data.

Where you have given your consent to processing, in addition to the right stated above, at any time you have the right to;



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- Withdraw the consent to processing without affecting the lawfulness of the processing based on consent before withdrawal;
- Request the erasure of your personal data.

You may obtain further information on how to exercise your rights or to request access to or rectification or erasure of your data by sending an email at: dp@dolmen.com.mt

If, at any time, you deem that the processing of your personal data is not being conducted in compliance with this Policy or with any applicable law, you may lodge a complaint with the Data Protection Officer:

Information and Data Protection Officer, Floor 2, Airways House, Triq Il-Kbira, Sliema. Tel. 00356-23287100; email: idpc.info@idpc.org.mt.

7. Changes to this Policy

We will periodically review this Policy. Any changes we may make to our Privacy Policy in the future will be posted on this page and any such changes will become effective upon posting of the revised Privacy Policy.

Summary:

Category of Data Subject	Categories of Data
Applicants to a Vacancy	CV / Speculative applications
	Resume / Cover Letter
	References
	Unsolicited, Unnecessary Data

Retention Period (all categories):

Unsolicited, unnecessary data	Non- Eligible Applicants	Eligible, Unsuccessful Applicants	Successful Applicants
No Retention at All	No Retention at All	6 Months following the Recruitment Campaign, subject to consent	Employees Privacy Policy Applies

Where to Retrieve the Data:

Department and Contact Person	Paper Archive	Digital Archive (Local)	Digital Archive (Remote)



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HR Personnel	Yes	Yes	N/A

Right	Way it is granted (*)
Access	E-Mail, Downloadable form
Rectification	
Erasure	
Withdrawal of Consent	E-Mail, Opt-out