

PERSONAL DATA PRIVACY POLICY FOR CANDIDATES FOR POSITIONS AS EMPLOYEES, INTERNS AND GOVERNING AND SUPERVISORY BODIES

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VERSION 5

RECRUITMENT PRIVACY POLICY

PERSONAL DATA PRIVACY POLICY FOR CANDIDATES FOR POSITIONS AS EMPLOYEES, INTERNS AND GOVERNING AND SUPERVISORY BODIES

I.SCOPE

This Privacy Policy for the Personal Data for Candidates for Positions as Employees, Interns, and Governing and Supervisory bodies (hereinafter referred to as the "*Policy*") of the company AB "KN Energies" (hereinafter referred to as "KN") provides information regarding processing of the personal data of candidates for positions as employees, interns, or governing and supervisory bodies (hereinafter referred to as the "*Candidate*"), where such processing is being carried out by KN, with that information covering areas such as categories for collected and processed data, its potential use, the storage of such data, etc.

This *Policy* is also an informational notice regarding the processing of personal data to KN *Candidates* for positions as employees, interns, and governing and supervisory bodies. It answers key questions about how the KN collects, uses, and stores information about *Candidates*. It also describes how *Candidates* can exercise their rights regarding the personal data processed. If a *Candidate* has any questions or any part of this *Policy* is unclear, KN is ready to assist, as described in Articles 7-8 of this *Policy*. If *Candidates* do not agree with this *Policy*, they may not submit their personal data to KN.

Candidates are not legally obliged to provide any of their personal data, but without it KN cannot process their applications for employment, internships or the activities of governing and supervisory bodies and evaluate their candidacy.

The most current and up-to-date version of the present *Policy* has been published on the following website: [Interneto svetainės lankytojų asmens duomenų privatumo ir slapkų naudojimo politika - KN](#)

II. THE PURPOSE OF PROCESSING PERSONAL DATA AND CATEGORIES

The following personal data shall be processed in the selection of vacancies for potential employees, interns, and governing and supervisory bodies and in the evaluation of *Candidates* for the purposes listed below:

Purpose: ***Candidate* recruitment**

CATEGORIES OF DATA SUBJECTS - Whom is personal data requested from for this purpose?		
From all the <i>Candidates</i> for positions as employees, interns, and governing and supervisory bodies.		
DATA CATEGORIES - What personal data is collected and processed?		METHOD OF COLLECTION AND PROCESSING - How is personal data collected?
General information about the <i>Candidate</i>	Full name, date of birth, residential address, email address, and/or telephone number. <i>Information regarding work experience:</i> former employers (names of the enterprises), period of employment, position, responsibilities and/or achievements.	KN collects this personal data from <i>Candidates'</i> CVs and / or other application documents (cover letter, copies of diplomas, etc.), KN employees providing a reference about the <i>Candidate</i> , as well as during interviews with the <i>Candidates</i> .

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	<p><i>Information regarding education:</i> educational institution, study period, acquired degree and/or qualification.</p> <p><i>Information regarding further training:</i> attended training courses, certificates acquired.</p> <p><i>Information regarding other skills:</i> language skills, IT and driving skills, and other competencies.</p> <p>Information about the relationship between the Candidate and the KN employee who recommended him/her.</p> <p>Any additional information which is provided in a CV and letter of motivation or other application documents.</p>	
Recommendations, employer feedback	<p>The person's, who is recommending the <i>Candidate</i> or providing feedback, contact details, and the contents of their recommendation or feedback.</p>	<p>KN collects feedback about the <i>Candidate</i> from KN employees when they provide a reference about the <i>Candidate</i>. Candidates themselves provide the contact details of former managers, and references are collected only from the individuals specified by the candidate.</p> <p>Recommendations are checked only for those candidates for who it is intended to offer employment/internship or conclude an activity contract.</p>
<i>Candidate</i> assessment information	<p>A summary of the interview with the <i>Candidate</i>, the insights and opinions of the interviewer, and the results of practical tasks performed, and <i>Candidate's</i> testing results.</p>	<p>KN collects information about the <i>Candidate</i> during the selection interviews from all interviewers. KN assesses the candidate's competencies based on the analysis of the practical tasks performed. KN collects information on the results of <i>Candidate</i> testing from legal entities providing candidate testing services.</p>

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Correspondence	Correspondence with the <i>Candidate</i>	If the <i>Candidate</i> contacts KN.
THE LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA		
Legitimate interest (GDPR, Article 6 (1) (f)), consent (GDPR, Article 6 (1) (a)), contractual obligation (the pursuit of an agreement) (GDPR, Article 6 (1) (b)).	Legitimate interest in selection of <i>Candidates</i> for positions as employees, interns, and governing and supervisory bodies, selecting suitable <i>Candidates</i> for the proper operation of KN, as well as a contractual obligation (the pursuit of a work/internship/activity agreement).	

Purpose: Verification of compliance of persons applying for or holding positions in an enterprise important for national security.

CATEGORIES OF DATA SUBJECTS - Whom is personal data requested from for this purpose?		
From the <i>Candidates</i> applying for the positions included in the list of positions approved by the order of the Minister of Energy of the Republic of Lithuania, and prepared on the basis of the Law on Protection of Objects Important for Ensuring National Security of the Republic of Lithuania to which persons are screened in accordance with the established procedure of the Government of the Republic of Lithuania and who, by the decision of the Selection Commission, are named as the final candidates and who are intended to be offered an employment/internship or to be appointed as governing and supervisory bodies.		
DATA CATEGORIES - What personal data is collected and processed?	METHOD OF COLLECTION AND PROCESSING - How is personal data collected?	
Information about the <i>Candidate's</i> final court convictions	Information provided in the Article 17 (2) (1-2) of the Law on the Protection of Objects Important for Ensuring the National Security of the Republic of Lithuania.	The information is provided by the Ministry of the Interior (hereinafter – MI) upon KN's request, after the candidate has filled in and signed the form <i>D336 Consent on the background check</i> .
Additional information provided in the Law on the Protection of Objects Important for Ensuring the National Security	Additional information provided in the Article 17 (2) (3-11) of the Law on the Protection of Objects Important for Ensuring the National Security of the Republic of Lithuania.	The <i>Candidate</i> submits documents to KN received from other institutions according to the Article 17 (2) (3,7,9) of the law. According to The Article 17 (2) (1,2,6,8,11) information is provided by the Ministry of the Interior. According to the Article 17 (2) (4,5,11) information is provided by

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of the Republic of Lithuania		State Security Department of Lithuania.
THE LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA		
Legal obligation (GDPR, Article 6 (1) (c))	Law on the Protection of Objects Important for Ensuring the National Security of the Republic of Lithuania.	

Purpose: Declaration of private interests and management of conflicts of interest.

CATEGORIES OF DATA SUBJECTS - Whom is personal data requested from for this purpose?		
From the <i>Candidates</i> applying for the positions included in a list of positions, approved by the order of CEO of KN, for which candidates are being screened by the Special Investigation Service of the Republic of Lithuania and who, are named as the final candidates and who are intended to be offered an employment/internship.		
DATA CATEGORIES - What personal data is collected and processed?		METHOD OF COLLECTION AND PROCESSING - How is personal data collected?
Information from various registers if they contain <i>Candidate's</i> data	Data is provided from the Register of Administrative Offenses, the Register of Suspects, Accused and Convicted Persons, the Register of Preventive Measures, the Register of Interior Officers; Register of Civil Servants; Information Systems of the State Tax Inspectorate under the Ministry of Finance of the Republic of Lithuania, the Board of the State Social Insurance Fund under the Ministry of Social Security and Labour; Chief Official Ethics Commissions.	The information is provided by the Special Investigation Service upon <i>KN's</i> request, after the <i>Candidate</i> has filled in and signed the form <i>D335 Consent on verifying data</i> .
THE LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA		
Legitimate interest (GDPR, Article 6 (1) (f))	A legitimate interest in enabling the private interests of those working in <i>KN</i> to be disclosed at the earliest possible stage, in ensuring that the public interest is given priority in decisions and in preventing conflicts of interest. Also, to identify related parties at the earliest possible stage, the risks of related party transactions and to effectively implement <i>KN</i> Guidelines on Related Party Transactions.	
Consent (GDPR, Article 6 (1) (a))	The information is provided by the Special Investigation Service upon <i>KN</i> request, after the candidate has filled in and signed the Consent on verifying data.	

Purpose: Reducing the likelihood of corruption in *KN*.

CATEGORIES OF DATA SUBJECTS - Whom is personal data requested from for this purpose?

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From <i>Candidates</i> who are offered a job / internship in writing or who are applying for the positions of the governing and supervisory bodies.		
DATA CATEGORIES - What personal data is collected and processed?		METHOD OF COLLECTION AND PROCESSING - How is personal data collected?
Information about the <i>Candidate's</i> property, relations with other legal entities	Names of the enterprises in which the part of capital or shares are held or with which there is another employment/ activity relationship.	<i>Candidates</i> for the positions of the CEO and other governing and supervisory bodies, fill in and sign the form <i>D310 Candidate's application for selection and declaration of integrity</i> .
<i>Candidate Relationship Information</i>	Information on working close family members (Employer or legal person; position held, amount of shares or share of ownership).	<i>Candidates</i> , who are named as the final candidates and who are intended to be offered an employment/internship fill in and sign the form <i>D221 Candidate declaration</i> .
<i>Candidate Relationship Information</i>	Information on relationships of close family members that have a legal relationship with companies that may have a relationship with KN	<i>Candidates</i> for the positions of the CEO and other governing and supervisory bodies, fill in and sign the form <i>D301 Declaration of impeccable reputation and independence of a candidate</i> .
Special categories of personal data	Personal convictions (regardless of whether the convictions have disappeared or been revoked), data on possible dependencies.	<i>Candidates</i> for the positions of the CEO and other governing and supervisory bodies, fill in and sign the form <i>D301 Declaration of impeccable reputation and independence of a candidate</i> .
THE LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA		
Legitimate interest (GDPR, Article 6 (1) (f))	Assess the credibility of the candidate and reduce the risk of corruption in KN.	
Consent (GDPR, Article 6 (1) (a))	<i>Candidates</i> for the positions of the CEO and other governing and supervisory bodies, fill in and sign Declaration of impeccable reputation and independence and <i>Candidate's</i> application for selection and declaration of integrity based of the consent of <i>Candidates</i> .	

III.SOURCES FOR OBTAINING PERSONAL DATA

3.1. Personal data about the *Candidate* shall be collected directly from the *Candidate*, when the *Candidate* responds to KN's recruitment notice for a job, internship, or to KN's selection for a

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position of governing and supervisory bodies and/or submits their CV to KN or completes the Candidate Declaration form and/or other application documents (such as their resume, letter of motivation, etc).

3.2. KN may also receive information about the *Candidate*, their CV, and/or other application documents from entities which are providing job-matching, recruitment, and/or intermediation services, such as the Employment Service under the Ministry of Social Security and Labour of the Republic of Lithuania, along with employment agencies, job-matching websites, career-based social media sites (such as LinkedIn), and/or any other permissible and relevant sources.

3.3. KN can also receive information about the Candidate, his CV and/or other candidacy documents from KN employees who provide a reference about the Candidate.

3.4. Certain information about the *Candidate* may be obtained from third parties, such as current or past employers who have provided their recommendations, Special Investigation Service of the Republic of Lithuania, the Police Department, the Information Technology and Communications Department under the Ministry of the Interior of the Republic of Lithuania, and the State Security Department.

Recommendations that are submitted by the *Candidate* shall be verified with the *Candidate's* indicated employer asking for the feedback only in such cases if the *Candidate* has provided their consent to contact the specified employer or any other persons provided by the *Candidate* to obtain feedback on the *Candidate*.

Consent of the *Candidate* is required in cases in which an application regarding the check on the *Candidate* in accordance with Article 17 of the Republic of Lithuania Law on the Protection of Objects of Importance to Ensuring National Security and/or Articles 9 (2) of the Republic of Lithuania Law on Prevention of Corruption is submitted to the authorities specified in the said laws.

IV.STORAGE PERIOD FOR PERSONAL DATA

Personal data, which is contained in the CV, letter of motivation/intent, and/or other application documents which are submitted by the *Candidates* shall be processed and stored by KN until the end of the recruitment process for any job, internship, in case of the selection of governing and supervisory bodies – until the end of selection process for which the *Candidate* has applied. The end of the probationary period for a *Candidate* who has signed an employment contract (which is to last for no more than three (3) months), shall be considered as being the end of the recruitment process in the case of employee's recruitment, and in cases covering the recruitment of members of the governing and supervisory bodies and for internships, the end of the process shall be considered to be the date upon which the activity contract or internship contract is signed by the *Candidate*. When the recruitment/selection process is complete all the data of *Candidates*, who were not offered an employment/internship or with whom an activity contract has not been signed, collected for selection purposes will be securely destroyed.

The storage of *Candidate* personal data may be continued beyond the period specified in the present *Policy* only in cases in which the following points apply:

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- there is reasonable suspicion of the existence of unlawful activities, concerning which there is an ongoing investigation,
- the *Candidate's* personal information is required for the proper resolution of any disputes or complaints,
- The *Candidate's* data is stored based on his / her consent for a maximum of 1 (one) year for the purpose of offering the *Candidate* a job in the future,
- A period of 2 years may be envisaged on this basis of Order of the Head of the State Tax Inspectorate under the Ministry of Finance of the Republic of Lithuania No. VA-128, issued 31 December 2015 "On the Approval of the Rules for Completion, Submission and Revision of the Declaration of the List of Residents of the List of Residents Obligated to Declare Property FR0002 and Its Annexes",

In any case, *KN* may store the consent given by the *Candidate* and evidence of the receipt of such consent for a longer period if it is necessary to provide a defence to any claims or lawsuits against *KN*.

V.DISCLOSING PERSONAL DATA TO THIRD PARTIES

KN may transfer the *Candidate's* personal data to third parties for processing, where such third parties provide services which are related to the recruitment, assessment, and internal administration of the *Candidates* (such as recruitment services, forms of information technology, etc.), in accordance with the instructions which have been given by *KN*. In such cases, the data in question is to be transferred only to such an extent that makes it possible to implement specific instructions which have been given by *KN* or which are required for the full provision of specific services. *KN* shall conclude written agreements with all the involved data processors, based on which such data processors may only process the personal data of *Candidates* by following the instructions given by *KN* and are not unable to use such data for other purposes without obtaining consent from *KN*.

KN may also transfer the personal data of a *Candidate* for processing by designated authorities which are specified in Article 17 of the Republic of Lithuania Law on the Protection of Objects of Importance to Ensuring National Security and Article 9 of the Republic of Lithuania Law on Prevention of Corruption.

VI.TRANSFERRING PERSONAL DATA OUTSIDE THE EU

KN shall process the personal data of *Candidates* within the European Union's overall borders alone, unless such processing of personal data is governed by a separate agreement with the processor of the data and it is justified in accordance with the requirements of Articles 45, 46, and 49 of the GDPR. Currently, *KN* has no intention of transferring the personal data of the *Candidates* to any processors or recipients of personal data in any third countries and is not currently transferring any such personal data.

VII.THE RIGHTS OF THE CANDIDATE

The *Candidate* shall have the following rights:

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- to ensure that they are aware (being informed) of the processing of their personal data (categorised as the “right to know”), which is implemented by presenting the *Candidate* with this *Policy* which they can familiarise themselves with.
- to be able to access their personal data and to learn how it is processed (categorised as the “right of access”).
- to require rectification of their personal data or, considering the purposes behind the processing of their personal data, to have any incomplete personal data completed (categorised as the “right to rectification”).
- to be able to withdraw their consent for processing their personal data in cases in which such personal data is being processed on the basis of the consent which was given by the *Candidate* (categorised as the “right to withdraw consent for processing”).
- to require removal of the personal data concerning the *Candidate* (categorised as the “right to be forgotten”).
- to require KN to restrict processing of their personal data (categorised as the “right to restriction of processing”).
- to object to the processing of their personal data at any time in cases of public interest or where such a course of action is necessary for the legitimate interests of *KN* or a third party (categorised as the “right to object”).
- to be in receipt of personal data concerning the *Candidate*, which they have provided to *KN* in a structured, commonly used, and machine-readable format, and to transmit such data to another data controller (categorised as the “right to data portability”).
- to lodge a complaint with the State Data Protection Inspectorate (17, L. Sapiegos st. 10312 Vilnius, tel.: (+370 5) 271 2804, 279 1445; e-mail: ada@ada.lt).

If the data subject, having access to their data, considers that it is being processed unlawfully, they shall submit a written request to *KN* for the destruction of the unlawfully processed data and *KN* shall immediately, but not later than within 5 working days, check the lawfulness of the processing. If the data is processed unlawfully, *KN* shall destroy the unlawfully processed personal data or suspend the processing of such data, except for storage, and immediately inform the data subject.

If the data subject, having access to their personal data, finds that it is incorrect, incomplete, or inaccurate, they shall address a written request to *KN* to correct it, providing identification documents and proof of their correct personal data. The responsible employee of *KN* must immediately check the personal data and if the written request of the data subject is submitted in person, by post or electronic means, to supplement or update incomplete personal data, correct inaccurate and erroneous personal data, or suspend such processing, except storage. Technical errors may be corrected at the written request of the data subject or at the initiative of the employee who observed the error.

VIII.PROCESSING APPLICATION

Candidates may apply for their rights by filling in the relevant forms found on the [kn.lt](https://www.kn.lt) website <https://www.kn.lt/en/about-us/operational-documentation/personal-data-privacy-policy/3793> and submitting a written request to *KN*, delivering it directly or sending it to 19, Buriu str., LT-92276 Klaipeda, or by e-mail info@kn.lt.

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Upon receipt of the data subject's application regarding the enforcement of any of the data subject's rights, KN shall verify the identity of the data subject. For this purpose, the KN employee who is in receipt of the application shall request an identity document. Additional documents which serve to prove the identity of a data subject who has submitted their application will not be required where such an application has been electronically signed with a qualified e-signature.

KN shall undertake to provide information regarding any actions which are or must be taken due to an application which has been received and without undue delay. However, such actions must be undertaken no later than within one month of receipt of such an application. Considering the potential difficulty of such process, and due to the number of applications which may be received, KN shall have the right to extend the period of one month by another two months by notifying the applicant of such an extension before the end of the first month and indicating the reasons for such an extension.

In cases in which the application is submitted by electronic means, the reply to the data subject shall also be submitted by electronic means, except for cases in which such a method of operation is not possible (due to the presence of an especially large scope of information, for instance), or where the data subject requests a reply to be submitted by a different means of communication.

KN may reject an application by the data subject by providing a reasoned reply in cases in which any circumstances which have been provided for in legislation have been found to be true, with the data subject being notified in writing of the existence of such circumstances.

IX. PERSONAL DATA CONTROLLER

Public company "KN Energies" (KN), legal entity code 110648893, address – Burių g. 19, LT-92276 Klaipėda, Lithuania.

Email address – info@kn.lt, phone +370 46 391 772.

X. TECHNICAL AND ORGANISATIONAL MEASURES FOR THE PROTECTION OF PERSONAL DATA

Personal data at KN is processed in accordance with the requirements of existing legislation by the European Union and the Republic of Lithuania, as well as in terms of following the instructions of the controlling authorities. KN implements all necessary technical and administrative measures to protect its collected data from any loss, unauthorised use, or any modifications. KN employees are under a written obligation not to disseminate any information which may be received at their workplace, including information about the Candidates when it comes to job openings.

XI. REVISIONS AND UPDATES TO THE POLICY



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This Policy is reviewed and, if necessary, updated at least once a year. The KN Data Protection Officer is responsible for reviewing and updating the Policy.

Last updated: March 5, 2025.