



## Candidate Privacy Policy

TFI Markets Ltd (the 'Company') is a licensed Payment Institution, regulated by the Central Bank of Cyprus (License No. 115.1.2.13/2018) and licensed Investment Firm, regulated by the Cyprus Securities and Exchange Commission (License No. 117/10).

TFI Markets pays particular attention to handling personal data, thus creating this Privacy Policy (the 'Policy'). TFI Markets is subject to the provisions of the General Data Protection Regulation (EU) 2016/679 ('GDPR') and any other relevant law or regulation. The Company acts as a controller of personal data under GDPR, which means that it determines alone or jointly with others, the purposes and means of the processing of personal data.

This Privacy Policy concerns natural persons who are applying for a career opportunity with the Company.

### Candidates personal data

In order to apply for a career opportunity with TFI Markets, the following personal data might be collected from candidates:

- a. Contact information: Full Name, contact details (address of residence, email, telephone, mobile phone)
- b. Related Experience: Past and current job information, such as name of employer, location of employer, timeframe of each job position, job description, personal achievements etc.
- c. Education: University degree(s), Certifications etc.
- d. Other: Other information that the candidate may provide to us such as language and other skills, awards etc.
- e. Data may also be collected from other public sources of information such as social networks e.g. LinkedIn, personal blogs etc.
- f. For successful Candidates before the employment can commence the Company may request from the Candidate to provide background information such as clear criminal record and non-bankruptcy certificates, in order to meet the Company's regulatory and legal obligations

The Company does not accept employment applications from persons who are under the age of eighteen (18).

### Sources of personal data

The Company collects personal data about candidates through the application and recruitment process from the following sources:

- a. The candidate
- b. Recruitment agencies and services
- c. The candidate's named referees, from whom the Company might collect a formal reference.

## Protection of personal data

The Company takes a number of measures to keep personal data safe and secure, both internally and from outsiders, from loss, misuse, unauthorized access, disclosure, alteration and destruction, and to ensure the integrity of the data collected.

Some of the measures include: data encryption and digital signatures to ensure the protection and integrity of personal data; firewalls, intrusion detection systems, 24/7 physical protection of facilities where personal data is stored; background checks for personnel that access physical facilities; and strong security procedures across all service operations.

## Legal basis for the collection and processing of personal data

The Company will only hold, process and disclose personal data provided by the candidate and by any recruitment agency or other third party in respect of the application, to the extent necessary for the following purposes, as permitted by local law:

- a. For the purpose of recruitment / appointment to a role the candidate applied for
- b. For the purpose of carrying out reference checks
- c. In order to comply with any legal or regulatory obligations
- d. For the Company's legitimate business interest in monitoring and promotion of equal opportunities, review of gender equality, and provided the interests of the Company are not overridden by the candidate's interests.

For candidates that accept an offer from the Company and become an employee, the personal data provided or obtained as part of the application process will:

- a. be used to manage the new-hire process,
- b. become part of the employee's employment file, and
- c. may be used for other employment or work-related purposes.

Further details about how the Company treats personal data for employees are included in the Company's Employee Handbook that will be made available to new employees.

## Recipients or categories of recipients of personal data

During the recruitment process, the candidate's personal data may be disclosed to:

- a. The Company's HR department
- b. Other departments of the Company that might be actively recruiting
- c. Professional advisors, service providers and other third parties that are part of the Company's recruitment process
- d. To regulators and government departments such as the Central Bank of Cyprus, the Cyprus Securities and Exchange Commission as the Company is obliged or required to disclose information

All third-parties appointed by the Company to process personal data are bound by contract or other Confidentiality or Non-Disclosure Agreement to comply with the GDPR provisions.

## International transfer of personal data

Personal data may be transferred to third countries (countries outside the European Economic Area) to recipients mentioned in the above paragraph, for the purposes described in this Privacy Policy. Although personal data may be transferred to countries that may have different laws and data protection

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requirements, processors in those countries are obliged to comply with the European data protection standards when processing personal data of European citizens.

### Period for which personal data are stored

- a. Successful candidates: If the application for employment is successful, personal data gathered during the recruitment process will be transferred to the Company's HR, Payroll or other employee related systems and retained during the employment in accordance with the Company's Employee's Handbook and retention policies,
- b. Unsuccessful applicants: If the application for employment is not successful, the Company will retain the candidate's data for 6 months after the end of the relevant recruitment process to the extent necessary to enable the Company to comply with any legal obligations or for the exercise or defence of legal claims. If the candidate agrees to allow the Company to keep their personal data on file (for consideration for future employment opportunities) the data will be maintained until the candidate withdraws consent or sooner.

In case any court actions or other legal proceedings are pending or impending, personal data will be deleted after termination of the court action or legal proceeding.

### Candidate rights

Candidates have the following rights with respect to their personal data the Company controls and processes:

- a. The right to request and get copies of, their personal data
- b. The right to request the correction of inaccurate personal data
- c. The right to request the erasure of their personal data, where the Company's other legal and/or regulatory obligations allow it
- d. The right of their data portability to another data controller
- e. The right to object to the processing of their personal data. In such case, the Company shall no longer process the specific personal data, unless it demonstrates on compelling legitimate grounds for the processing. Clients can also object at any time to the processing of their personal data for direct marketing purposes.
- f. The right to request the restriction of processing of their personal data under certain conditions

### Automated decision making and profiling

The Company is not using automated decision making and profiling during the recruitment process.

### Changes to the privacy policy

The Company may amend the Privacy Policy at any time. Candidates will be notified of material changes however they are advised to check the Privacy Policy regularly so as to stay informed about the processing and protection of personal data.

### Contact Details

Our Data Protection Officer can answer questions and provide information on how the Company uses personal data. The contact details of the DPO are: 178 Athalassas Avenue, 'Irene Tower' 2nd Floor, 2025 Nicosia, Cyprus, email: [dpo@tfimarkets.com](mailto:dpo@tfimarkets.com).