

Ver. 1.0 of 19/06/2018

This Privacy Policy (the “Policy”) sets out and describes the way in which Tumas Gaming (hereinafter also the “Company”; “we”; “us”; “our”) collects and processes the personal information and data 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 Tumas Gaming Limited, Level 3 Portomaso Business Center, PTM01, St. Julians, Malta. Telephone Number: 00356 - 21372292 ; email: info@portomasogaming.com.

### **2. Grounds and Purposes of the Processing**

As your prospective Employee 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 only 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 intended 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 it.

### **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 an ADs Aggregator’s website) 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 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, adequate and effective technical and physical safeguards as well as highly trained personnel to protect your personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

We are a very structured and articulated Group and therefore we may share your personal data between 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 Resources department, 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, subject to your consent, Application Data pertaining to speculative and / or unsuccessful applications, where we deem your profile might be of interest to us should a relevant, future vacancy arise, may be retained up to 6 months following the end of the recruitment process. If you do not wish we process any longer your Application Data, at any time you may withdraw your consent by sending us an email at [privacy@tumasgm.com](mailto:privacy@tumasgm.com).

Following a successful application, on the other hand, we may still keep some of 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:

- 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: [privacy@tumasgm.com](mailto:privacy@tumasgm.com).

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 Commissioner**, Floor 2, Airways House, Triq Il-Kbira, Sliema. Tel. 00356-23287100; email: [idpc.info@idpc.org.mt](mailto: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.