

# Hotel Brain International Ltd. Applicant Privacy Policy

Last Updated:

Hotel Brain International Ltd. and its direct and indirect subsidiaries (“we”, “our” or “us”) value the trust of individuals submitting job applications to Hotel Brain International Ltd. (“you” or “Applicant”) and are committed to the responsible management, use and protection of personal information. This Applicant Privacy Notice (this “Notice”) applies to all the information collected by Hotel Brain International Ltd. to facilitate your job application and includes your use of our careers site. This Notice explains how Hotel Brain International Ltd. processes the personal information that we collect through the job application process (“personal information”).

Personal information submitted to other Hotel Brain International Ltd. websites will be used in accordance with our Global Privacy Statement.

In some locations around the world, Hotel Brain International Ltd. manages hotel properties on behalf of a third-party owner. At many of these properties, the Hotel owner is the actual employer, and Hotel Brain International Ltd. performs recruiting and hiring functions on behalf of the owner. You understand and agree that, by applying through this site, you may be applying for a position with a company other than Hotel Brain International Ltd., where Hotel Brain International Ltd. is serving as the recruiter, but will not be your employer of record.

## Your Consent

Please read this Notice carefully and indicate your acceptance of our collection, retention, use, transfer, and disclosure of personal information as described in this Notice by clicking “I Accept” at the end of the application.

Your personal information may be transferred to countries outside your home country, including countries where data protection laws may differ from those of your home country.

Hotel Brain International Ltd. maintains safeguards designed to protect your personal information. If you are a resident of the EEA, please see Appendix A for additional information.

## Information You Provide

This Notice covers any personal information you submit to apply or search for a position at Hotel Brain International Ltd. which may include:

Log-in and password, for users of the Careers Site;  
How did the applicant find out about the job?;  
CV, résumé, cover letter;  
Name and contact information (such as your home address, telephone number, mobile telephone number, and email address);  
References (name, employer, title, relationship, email, phone);  
Responses to screening questions;  
Employment preferences, willingness to relocate, willingness to travel, current salary, desired salary;  
Previous (or current) work experience (such as start and end date, employer, responsibilities)  
Education (such as Education level, School, Major)  
Certifications held;  
Self-Identification (such as Age range, Gender, Religion, Disabled, Ethnic Group)  
Hotel Brain International Ltd. may also collect the following information from applicants in the United Kingdom and Ireland and other EEA jurisdictions:

Right to Work Document Type

If the document provided is a Visa/Work Permit, please provide the type:

Number

Country of Issue

Place of Issue

Issue Date

Expiry Date

We do not require, but you may voluntarily choose to provide, other relevant information as part of your application. Please do not submit the following sensitive information unless we specifically request that you provide such information so that we may comply with our legal obligations and/or internal policies relating to diversity and anti-discrimination: sexual orientation, race, ethnic origin, religion, political and religious beliefs, disability, marital status, creed, nationality, national origin, color and/or age.

By voluntarily submitting information about your racial or ethnic origin; physical or mental health or condition; job evaluations or educational records; commission (or alleged commission) of an offense or related proceedings; political opinions or beliefs; religious beliefs; sex life; membership in a trade union or political party, you expressly authorize Hotel Brain International Ltd. to receive and process such information for the purpose of processing your application.

Any information you submit must be true, complete, and not misleading and you must have the lawful right to provide it. If not, this may lead to a rejection of your application during the application process or disciplinary action including immediate dismissal if you have been hired.

If you intend to provide us with details of a reference or any other third party as part of your CV/resume, it is your responsibility to obtain consent from that third party prior to providing his/her personal information to us.

The provision of personal information, including on the Careers Site, is voluntary. Please note however that the failure to provide sufficient information may result in Hotel Brain International Ltd. being unable to consider you for employment.

## Legal Bases and Use of Personal Information

The information that you submit in your application on the Careers Site will be stored in the EU. It will be collected, used, transferred, and disclosed by employees, consultants, and/or service providers of Hotel Brain International Ltd. around the world for Hotel Brain International Ltd. global recruitment functions and for related management and planning purposes, including, as permitted by local law, to:

Process your application;

Assess your capabilities and qualifications for a job;

Provide to you any services available on the Careers Site from time to time;

Communicate with you;

Comply with any applicable law or regulation; and

Conduct background checks if you are offered a job.

Personal information about you will be added to Hotel Brain International Ltd.'s international candidate database and will be used for the purposes of considering whether your profile is suitable for other job vacancies at Hotel Brain International Ltd. If we elect to make you an offer, the personal information you submit may be incorporated into our human resources system and used to manage the new-hire process. The processing of your personal information for these purposes is based on your consent. If you become a Team Member, any personal information that you submit may become part of your Team Member file and may be used for other employment/work-related purposes and otherwise in accordance with the Hotel Brain International Ltd. Team Member Privacy Notice.

To the extent any use is inconsistent with or outside of the contemplated uses in this Notice, we will communicate it to you at the time of use.

## Disclosure of Personal Information

Personal information about you will be reviewed by Hotel Brain International Ltd. Team Members or agents who have a business need to access such personal information and may include recruiters, human resources personnel, technical services personnel, and managers or their designees.

We may share personal information about you with selected service providers or consultants acting on our behalf. Those third parties are required by contract to use appropriate measures to protect the confidentiality and security of personal information.

Hotel Brain International Ltd. also may disclose personal information about you in order to:

Protect the legal rights, privacy, safety, or property of Hotel Brain International Ltd. or its Team Members, agents, contractors, customers, or the public;  
Protect the safety and security of visitors to our websites or other properties;  
Protect against fraud or other illegal activity or for risk management purposes;  
Respond to inquiries or requests from legal authorities;  
Permit Hotel Brain International Ltd. to pursue available remedies or limit the damages that we may sustain;  
Enforce our website Terms of Service;  
Respond to an emergency;  
Comply with the law or legal process;  
Effect a license, sale or transfer of a business or assets (including in connection with any bankruptcy or similar proceedings); or  
Manage acquisitions, mergers, and re-organizations.  
Data Retention

We are required to retain information relating to candidates applying for jobs within the EEA. We will retain your personal information for **three** years during which time we may contact you regarding open positions. Personal Information of candidates applying for jobs in other parts of the world will be retained in accordance with local law. If there is no activity in relation to the personal information, Hotel Brain International Ltd. may remove it from its database, subject to Hotel Brain International Ltd. data retention obligations and policies and any applicable legal or regulatory obligations or for the period of time permitted by local laws, for the purpose of considering whether your skills are suitable for other opportunities.

Note that Hotel Brain International Ltd. may delete personal information about you at any time (including your CV/resume), without any reason. Therefore, please retain your own copy of the personal information provided to us.

## Passive Information Collection: Cookies and Similar Technology

We and our service providers may use "cookies" and similar technologies on the Careers Site. Cookies are data that a web server transfers to an individual's computer for record-keeping purposes. We use cookies and other technologies to better serve you with more tailored information and facilitate your ongoing access to and use of our Careers Site. Suppose you do not want information collected through the use of cookies. In that case, there is a simple procedure in most browsers that allow you to decline cookies automatically, or to be given the choice of declining or accepting the transfer of a particular cookie, or cookies from a particular website, to your computer. However, if you decline session management cookies, the Careers Site may not function properly for you.

If you are an EEA resident, we are required to obtain your consent before placing certain cookies or similar technology on your computer. We will separately prompt you for this consent before we attempt to place a cookie or similar technology on your computer.

## Access, Correction, and Deletion

If you choose to register on the Careers Site, you may access, review, and change some of the personal information collected about you and stored on the Careers Site by logging into the Careers Site and choosing to update your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change personal information that you already have submitted for consideration for a specific position, please resubmit your application to update personal information about you that is associated with that job application. We encourage you to promptly update your personal information if it changes or is inaccurate. Upon your request, we will deactivate or remove your personal information from our active databases, although some information may be retained as permitted or required by law.

If you have any questions or concerns about how we otherwise process personal information please contact us at the e-mail link below.

Click here to send an email to [dataprotectionoffice@hotelbrain.com](mailto:dataprotectionoffice@hotelbrain.com)

You may access, modify or object to the use of personal information as permitted by applicable local law. Please contact us at the e-mail link below with any such requests. Please note that certain personal information may be exempt from such access, correction, or objection rights pursuant to local data protection laws. Furthermore, if you are an EEA resident, you may have other rights with respect to your personal information as explained in Appendix A.

## Career Site Security

We take reasonable precautions to safeguard the personal information transmitted between visitors and the Careers Site and the personal information stored on our servers. Unfortunately, no method of transmitting or storing data can be guaranteed to be 100% secure. Do not send sensitive information via email. It is your sole responsibility to use the appropriate level of care whenever communicating with us.

If you have reason to believe that your interaction with us is no longer secure (for example, you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem by contacting us at the link below.

[hr@hotelbrain.com](mailto:hr@hotelbrain.com) Human Resources, Konstantinou Karamanli St.195, 16673 Voula, Greece

Hotel Brain International Ltd. hereby disclaims, as far as permitted by law, any liability for itself and its affiliated companies and contractors for any of your information sent to our Careers Site that is lost, misused, illegally accessed, disclosed, altered or destroyed, or not integrally or timely delivered to our Careers Site.

## Links to other websites

The Careers Site may contain links to other websites. The operators of those other websites may collect information about you, through cookies or other technologies. If you link to another website, you will leave the Careers Site and this Notice will not apply to your use of and activity on those other sites.

If you provide personal information through or on any other site, your transaction will occur on that website (not the Hotel Brain International Ltd. Careers Site) and the personal information you provide will be collected by and controlled by the privacy policy of that website operator.

Links on the Careers Site to other websites are provided only as a convenience, and the inclusion of such links does not imply endorsement of the linked site. We encourage you to read the legal notice posted on those sites, including their privacy policies. We have no responsibility or liability for your visits to, or the data collection or use practices of, other sites.

## Law Applicable to Job Application

The Careers Site allows you to benefit from Hotel Brain International Ltd. centralized global recruitment function while applying for jobs worldwide. This Careers Site is operated from Greece. Accordingly, any personal information you submit to the Careers Site will be collected in the EU and will be subject to EU and Greek laws. However, if we share your personal information with an affiliate located in another country in its capacity as a potential employer (or acting as a recruiter for a Hotel owner), the affiliate will handle your personal information in accordance with this Notice. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located. Furthermore, if you are an EEA resident, please see Appendix A for additional information on International Data Transfers.

## About Children

The Careers Site is not intended for minors under the age of 15 or the lawful age of employment (whichever is greater) in any country in which we operate.

## Changes to the Notice

We reserve the right to amend this Notice at any time without advance notice in order to address future developments of Hotel Brain International Ltd., the Careers Site, or changes in industry or legal trends. We will post the revised Notice on the Careers Site or announce the change on the

home page of the Careers Site. You can determine when the Notice was revised by referring to the "Last Updated" legend on the top of this Notice. Any changes will become effective upon the posting of the revised Notice on the Careers Site. By continuing to use the Careers Site following such changes, you will be deemed to have agreed to such changes. If you disagree with the terms of this Notice, in whole or part, you can choose to not continue to use the Careers Site.