

Privacy Policy

This policy:

- provides an overview of how HORECA HR SOLUTIONS LTD collects and processes your personal data and tells you about your rights under the local data protection law and the EU General Data Protection Regulation ('GDPR'),
- is directed to and applies to persons who are either current or potential clients of the services of the Company, Users of this website, candidates, suppliers and other people who we may contact in order to find out more about our candidates.
- contains information about when we share your personal data with third parties.

In this policy your data is sometimes called “personal data” or “personal information”. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data or any such action as “processing” such personal data.

For the purposes of this policy, personal data shall mean any information relating to you which identifies or may identify you and which includes, for example, your name, address, identification number.

When visiting our website or any of our affiliated websites, using our application or using any of the services offered via the Website or the Application, you acknowledge, and where applicable consent to, the practices described in this policy.

Our Services may contain links to third party services. If you click on a link to access any of those third-party services, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check these policies before you submit any personal information to such third-party websites.

Our Services connect you with Job Seekers, Jobs, or Employers (as applicable), giving you the ability to search for, browse, and communicate with Job Seekers, Jobs, or Employers (as applicable).

1. Who we are

HORECA HR SOLUTIONS LTD is a private company limited by shares incorporated in Cyprus having its registered office and head offices in Engomi, Nicosia and is the data controller and processor of information collected through this website. **HORECA HR SOLUTIONS LTD** (referred to as ‘we’, ‘us’, ‘our’, ‘HORECA HR SOLUTIONS LTD’ or the ‘Company’) is committed to protecting your privacy and handling your data in an open and transparent manner.

If you have any questions or want more details about how we use your personal information, you can contact us on email: info@lavoria.com .

2. What personal data we process and where we collect it from

We will ask you to provide us with your information when you:

- fill in forms on our Website, App or correspond with us by phone, email or otherwise;
- register to use our Services;
- use the Services;
- report a problem with our Website, App or Services; or
- complete any surveys we ask you to fill in for research purposes (although you do not have to respond to these if you do not want to).

Clients (prospective employers/employers): We collect and process different types of personal data (including but not limited to first, middle and last name of contact person, name of company and its directors, e-mail, phone number, city and country) which we receive from our clients (prospective and existing) in person or via their representative, in the context of providing you with services such as finding the best available candidates for your opportunities /vacancies. Moreover, we may also use the Employer's logo on our website and for the purposes of promotion.

We may also collect and process personal data which we lawfully obtain not only from you but from other entities or persons or other third parties, public authorities, companies that introduce you to us.

We may also collect and process personal data from publicly available sources (e.g. the Department of Registrar of Companies and Official Receiver, the Land Registry, the Bankruptcy Archive, commercial registers, the press, media and the Internet) which we lawfully obtain and we are permitted to process.

Candidates: We collect and use data necessary to be able to find the best available opportunities and any further information needed to assess your eligibility through the different stages of recruitment. This information includes CVs, resume, identification documents, phone numbers, birth date, first, middle and last names, gender, location, educational records, work experience/work history, employment and position, references, financial information and links to SNSs (Social Networking Services). Information may also be collected through publicly available sources, for example, LinkedIn, job boards, by reference or word of mouth (you may be recommended by a friend, a former employer, a former colleague or even a current employer).

We may also collect sensitive personal data about you, related to your health, diversity information or details of any criminal convictions. Data about COVID-19 vaccination may be requested by the employer when applying for a job. Vaccination status is self-reported and we do not check it in any way.

We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

Also, we ask the candidates to upload a photo id and work permit with their face on the background, as well as a photo or scan of the document to verify the information in the profile (name, date of birth, citizenship, etc.). These documents are deleted from the database within three days.

The candidate's geolocation may be requested by the mobile device.

Website Users: this term includes clients and candidates, in addition to Users of the website. We collect and use only the information necessary to improve your experience when using our website. This may include how, when and how often you visit us.

The relevant personal data which we collect may include:

Name, address, contact details (telephone, email), identification data, birth date, place of birth (city and country), marital status, employed/self-employed.

We collect the personal data from our website, mobile application (for candidates) and CRM (Customer Relationship Management) form for employers/prospective employers.

With regard to each of your visits to our Website or App we may automatically collect the following information:

- device-specific information, such as your hardware model, operating system version, unique device identifiers, Universal Device Identifier (UDID), ID for Advertisers (IDFA) and mobile network information;
- technical information about your computer, including where available, your IP address,

operating system and browser type, and also latitude/longitude and related geo information of your whereabouts (i.e. city, post code), this may be collected if you opt-in to share your location or inferred from your IP address, for system administration, analytical or Service delivery purposes; and

- details of your visits to our Website, App, including your browser fingerprint, the full Uniform Resource Locators (URL) clickstream to, through and from our Website, App (including date and time), length of visits to certain pages, and page interaction information (such as scrolling, clicks, and mouse-overs).

3. Why we process your personal data and on what legal basis

We process your personal data in accordance with the GDPR and the local data protection law for one or more of the following reasons:

- **For the performance of a contract**
We process personal data in order to provide services based on contracts with our clients but also to be able to complete our acceptance procedure so as to enter into a contract with prospective clients.
The purpose of processing personal data depends on the requirements for each product or service and the contract terms and conditions provide more details of the relevant purposes.
- **For our legitimate interests**
For prospective candidates, contractors and clients our processing is necessary for our legitimate interests – we need this information in order to be able to assess suitability for potential roles, to find potential candidates and to contact clients and suppliers.
- **You have provided your consent**
Provided that you have given us your specific consent for processing (other than for the reasons set out hereinabove) then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

4. Who receives your personal data

In the course of the performance of our contractual and statutory obligations your personal data may be provided to prospective employers primarily in the hotel and restaurant industry. Various service providers and suppliers may also receive your personal data so that we may perform our obligations. The prospective employer may contact you directly by connecting with you as a candidate by chat, telephone or online means.

It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations or if you have given your consent. All data processors appointed by us to process personal data on our behalf are bound by contract to comply with the GDPR provisions.

In addition, we may also disclose your personal information to third parties in the following circumstances:

- If we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
- If HORECA HR SOLUTIONS LTD or substantially all of its assets are acquired by a third party, personal information about our customers will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of HORECA HR SOLUTIONS LTD, our customers, or others. This includes exchanging information with other companies

and organisations for the purposes of fraud protection

- Fraud Prevention and other checks. We and other organisations may also access and use your personal information to conduct credit checks and checks to prevent fraud. If false or accurate information is provided and fraud is identified or suspected, details may be passed to fraud prevent agencies;
- We may disclose your personal information to third parties, the court service and/or regulators or law enforcement agencies in connection with proceedings or investigations anywhere in the world where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

We will not sell your personal data (or any other data you provide us with) to third-parties; however, we reserve the right to share any data which has been anonymised and/or aggregated. You acknowledge and accept that we own all rights, title and interest in and to any derived data or aggregated and/or anonymised data collected or created by us.

The Job Seeker's profile can be promoted - we can use the Job Seeker's profile in advertising (for example, it can be shown at an exhibition).

5. Payments

We rely upon a number of legal grounds to ensure that our use of your Personal Data is compliant with applicable law. We use Personal Data to facilitate the business relationships we have with our Users, to comply with our financial regulatory and other legal obligations, and to pursue our legitimate business interests. We also use Personal Data to complete payment transactions and to provide payment-related services to our Users.

Contractual and pre-contractual business relationships. We use Personal Data for the purpose of entering into business relationships with prospective users, and to perform the contractual obligations under the contracts that we have with users.

Activities that we conduct in this context include:

Creation and management of HORECA HR SOLUTIONS LTD accounts and payment account credentials, including the evaluation of applications to commence or expand the use of our Services;

Creation and management of Stripe Checkout accounts;

Processing of payments with Stripe Checkout, communications regarding such payments, and related customer service.

While you are logged in, Stripe will give you the ability to make purchases using your stored Payment Credentials. Stripe may also allow you to make a purchase with your Payment Credentials by sending a message directly from the email address or phone number stored as your Stripe Credentials (for example, to authorize a purchase via SMS).

Stripe Checkout is a way of storing your Payment Credentials, but it doesn't change anything else about your relationship with HORECA HR SOLUTIONS LTD who you're paying or your bank or credit card company. You are ultimately responsible for the purchases you make using Stripe Checkout.

HORECA HR SOLUTIONS LTD is the one responsible for providing you the services that you purchase using Stripe Checkout, not Stripe. Stripe will use reasonable efforts to keep your Payment Credentials secure.

6. Security over the internet

No data transmission over the internet can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

Sensitive information between your browser and our Website and Application is transferred in encrypted

form using secure socket layer (“SSL”) or equivalent cryptographic protocols using certificates issued by a trusted third-party authority.

All information you provide to us is stored on our or our subcontractors’ secure servers and accessed and used subject to our security policies and standards.

We use hosted servers in the course of our business, including for the permission of marketing and sales activity. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential, ensuring it is secure and strong, and for complying with any other security procedures that we notify you of. We ask you not to share your password with anyone.

7. Transfer of your personal data to a third country

Your personal data will not be transferred to third countries [i.e. countries outside of the European Economic Area] unless required by law or you have provided your consent.

Your personal information may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the EEA. Regardless of location or whether the person is an employee or contractor, we will impose the same data protection safeguards that we deploy inside the EEA.

Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. In countries which have not had these approvals, we will either ask for your consent to the transfer or transfer it subject to European Commission approved contractual terms that impose equivalent data protection obligations directly on the recipient, unless we are permitted under applicable data protection law to make such transfers without such formalities.

Please contact us if you would like further details of the specific safeguards applied to the export of your personal data.

8. To what extent there is automated decision-making and whether profiling takes place

In establishing and carrying out a business relationship, we generally do not use any automated decision-making. We may process some of your data automatically, with the goal of assessing certain personal aspects (profiling), in order to enter into or perform a contract with you.

9. How we use your information and how we treat your personal data for marketing activities and whether profiling is used for such activities

Candidates: We use your personal data to match your skills and experience with a potential employer. We will initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of personnel. If you are chosen by the client and go through to the next stage we will then be collecting more information from you at the interview (or equivalent) stage and onwards in that manner. We may use your data to send you information that you may find interesting such as suggesting other jobs to you.

We use the profile update date and the date of the User's last activity to show the candidate's activity status.

Clients: We use your personal data to ensure that we can find the right candidate for the opportunities that you may have or for contractual obligations.

All Users: We may process your personal data to tell you about services that may be of interest to you or

your business. In particular, the User's phone number can be used for sending notifications via WhatsApp, Viber, Facebook.

The personal data that we process for this purpose consists of information you provide to us and data we collect and/or infer when you use our services, such as information on your transactions. We study all such information to form a view on what we think you may need or what may interest you. In some cases, profiling is used, i.e. we process your data automatically with the aim of evaluating certain personal aspects in order to provide you with targeted marketing information on products.

We can only use your personal data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so.

You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting us.

10. How long we keep your personal information for

We will only retain your information for as long as is necessary for us to use your information as described herein or to comply with our legal obligations. We may retain some of your information after you cease to use our services if we believe in good faith that it is necessary to meet our legal obligations. The personal information shall be erased after a year from the date of your last consent provided to HORECA HR SOLUTIONS LTD.

For prospective customer personal data [or authorized representatives/agents or beneficial owners of a legal entity prospective customer] we shall keep your personal data for 6 months from the date of notification of the rejection of your application or from the date of withdrawal of such application, as per Data Protection Commissioner directive (<http://www.dataprotection.gov.cy>).

11. Your data protection rights

You have the following rights in terms of your personal data we hold about you:

- **Receive access to your personal data.** This enables you to e.g. receive a copy of the personal data we hold about you and to check that we are lawfully processing it. In order to receive such a copy you can complete our web form through our website (<http://www.lavoria.com>).
- **Request correction [rectification]** of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to erase your personal data [known as the 'right to be forgotten'] where there is no good reason for us continuing to process it.
- **Object to processing of your personal data** where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling in as much as it is related to direct marketing.

If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

- **Request the restriction of processing** of your personal data. This enables you to ask us to restrict the processing of your personal data, i.e. use it only for certain things, if:
 - it is not accurate,
 - it has been used unlawfully but you do not wish for us to delete it,
 - it is not relevant any more, but you want us to keep it for use in possible legal claims,
 - you have already asked us to stop using your personal data but you are waiting for us to confirm if we have legitimate grounds to use your data.
- **Request to receive a copy** of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organizations. You also have the right to have your personal data transmitted directly by ourselves to other organizations you will name [known as the right to data portability].
- **Withdraw the consent that you gave us** with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact (info@lavoria.com)

We endeavour to address all of your requests promptly.

- **Right to lodge a complaint**

If you have exercised any or all of your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us, you have the right to complain by completing our on line contact form (info@lavoria.com). You also have the right to complain to the Office of the Commissioner for Personal Data Protection. Find out on their website how to submit a complaint (<http://www.dataprotection.gov.cy>).

HORECA HR SOLUTIONS LTD will not ordinarily charge you in respect of any requests we receive to exercise any of your rights detailed above; however, if you make excessive, repetitive or manifestly unfounded requests, we may charge you an administration fee in order to process such requests or refuse to act on such requests. Where we are required to provide a copy of the personal data undergoing processing this will be free of charge; however, any further copies requested may be subject to reasonable fees based on administrative costs. Asking us to stop processing your personal data or deleting your personal data will likely mean that you are no longer able to use our Services, or at least those aspects of the Services which require the processing of the types of personal data you have asked us to delete, which may result in you no longer being able to use the Services. Where you request HORECA HR SOLUTIONS LTD to rectify or erase your personal data or restrict any processing of such personal data, HORECA HR SOLUTIONS LTD may notify third parties to whom such personal data has been disclosed of such request. However, such third party may have the right to retain and continue to process such personal data in its own right.

12. Changes to this privacy statement

We may modify or amend this privacy statement from time to time.

We will notify you appropriately when we make changes to this privacy statement and we will amend the revision date at the top of this page. We do however encourage you to review this statement periodically so as to always be informed about how we are processing and protecting your personal information.

13. Cookies

Our website uses small files known as cookies to make it work better in order to improve your experience