

Candidate Privacy Statement

(for applications submitted via HarmonyHunter ATS Career Sites)

Last updated: 05.12.2025

1. Introduction

This Candidate Privacy Statement explains how personal data is processed when you submit a job application through a career website powered by the **HarmonyHunter Applicant Tracking System (ATS)**.

The career site where you are submitting your application is operated by **[Client'sCompanyName]** or one of its affiliated entities (collectively, the “**Company**”).

HarmonyHR provides the technical platform used to receive and manage applications but does not independently determine the purposes or means of processing candidate data submitted to the Company's career site.

If you have questions regarding the processing of your personal data in connection with a specific job application, you should contact the Company directly.

2. Roles and Responsibilities

For the purposes of applicable data protection laws:

The Company

is the **Data Controller**, meaning it determines why and how your personal data is processed during the recruitment process.

HarmonyHR

acts solely as a **Data Processor / Service Provider**, providing software infrastructure that enables the Company to collect and manage applications.

HarmonyHR does not use candidate personal data for its own recruitment, marketing, profiling, or other independent purposes.

3. Information Collected

When you apply for a job through the career site, the Company may collect personal information including but not limited to:

Identification information

- Name
- Email address
- Phone number
- Location or address

Professional information

- Resume / CV
- Work experience
- Education
- Skills and qualifications
- Portfolio links or professional profiles (e.g., LinkedIn)

Application information

- Answers to application questions
- Cover letters
- Salary expectations
- Availability

Supporting documents

- Resume attachments
- Certificates
- Work samples

Technical data

Certain technical data may also be processed automatically when you use the career site, such as:

- IP address
- browser information
- device type
- timestamps of application submission

This information is used solely to enable operation, security, and functionality of the platform.

4. Purpose of Processing

All the information collected herein is needed for considering your application for a job at **[Client'sCompanyName]** or, as applicable, at one of its affiliates.

Failure to provide this information may affect your eligibility for a position.

Your personal data may be used by the Company for purposes such as:

- evaluating your job application
- contacting you regarding the recruitment process
- scheduling interviews
- assessing qualifications
- maintaining candidate records
- considering candidates for future opportunities (where permitted by law)

HarmonyHR does **not** use your personal data for its own recruitment or marketing purposes.

5. Legal Basis for Processing (EEA / UK)

Where applicable under data protection laws such as the **GDPR**, the Company may process your personal data based on one or more of the following legal bases:

- taking steps prior to entering into an employment contract
- legitimate interests in conducting recruitment processes
- compliance with legal obligations
- your consent (where required)

The Company determines the legal basis applicable to your application.

6. Data Access and Processing

Your personal data may be accessed by:

- authorized employees of the Company involved in the recruitment process
- hiring managers and recruiters
- HR personnel
- authorized service providers supporting the recruitment process

HarmonyHR processes personal data **only on behalf of the Company** and **only according to the Company's instructions**.

HarmonyHR personnel may access limited data solely for:

- technical support

- system maintenance
- security operations
- troubleshooting

Such access is strictly controlled and logged.

7. International Data Transfers

Depending on the Company's location and infrastructure, your personal data may be processed in different jurisdictions.

HarmonyHR provides its services through secure cloud infrastructure that may involve international data transfers.

Where required by applicable law (including GDPR), appropriate safeguards are implemented, such as:

- standard contractual clauses
- data processing agreements
- security measures designed to protect personal data

8. Data Retention

Your personal data will be retained by the Company only for as long as necessary for recruitment purposes and in accordance with applicable laws.

Retention periods are determined by the Company.

HarmonyHR does not independently determine retention periods and stores candidate data only for as long as instructed by the Company through its use of the HarmonyHunter platform.

9. Data Security

HarmonyHR implements industry-standard technical and organizational security measures designed to protect personal data, including:

- secure infrastructure
- encryption in transit

- role-based access controls
- access logging
- security monitoring

While no system can guarantee absolute security, HarmonyHR takes appropriate steps to safeguard data processed within the platform.

10. Your Data Protection Rights

Depending on your location and applicable laws, you may have rights regarding your personal data, including the right to:

- access your personal data
- request correction of inaccurate data
- request deletion of your data
- restrict processing
- object to certain types of processing
- request portability of your data

Requests regarding your application or personal data should generally be directed to **the Company** that you applied to.

HarmonyHR will assist the Company in responding to such requests where required.

11. Automated Processing

The HarmonyHunter platform may include features that assist the Company in organizing or searching candidate information.

However, HarmonyHR does not independently make automated decisions about candidates.

Any hiring decisions are made solely by the Company.

12. Third-Party Links

Career sites may include links to third-party websites such as job boards, professional networks, or company pages.

HarmonyHR is not responsible for the privacy practices of such third-party websites.

13. Changes to This Privacy Statement

This Privacy Statement may be updated periodically to reflect legal, operational, or technological changes.

The latest version will always be available on the career site.

14. Contact Information

If you have questions about how your personal data is processed as part of a recruitment process, please contact the Company to which you submitted your application.

For questions regarding the HarmonyHunter platform itself, you may contact:

HarmonyHR LTD

HarmonyHR LTD, incorporated and operating under the laws of Kyrgyz Republic

Register № 309328-3301-000

Imeni Baltagulova st., 27

Bishkek, Kyrgyz Republic

Email: info@harmonyats.org

Consent Notice (displayed before submitting an application)

Before submitting your application you will be asked to confirm the following:

Consent / Acknowledgment

All the information collected herein is needed for considering your application for a job at **[Client'sCompanyName]** or, as applicable, at one of its affiliates.

Failure to provide this information may affect your eligibility.

If you want to know more about how we will process your information as part of our recruitment process please check our Privacy Statement.