

Notification on the Processing of Personal Data of Employment Candidates, Scholarship Candidates (Applicants and Recipients), and Interns at OKTA AD-SKOPJE

1. Introduction

OKTA AD-Skopje (hereinafter referred to as "OKTA") respects and values the privacy of every individual, including all candidates applying for employment (either directly or through temporary employment agencies), scholarship applicants, and interns (hereinafter referred to as "candidates").

Within this notice, the term "interns" includes all individuals participating in practical training, internships, or professional practice at OKTA, including high school students assigned for practice based on an agreement between the company, the student, and their parent/guardian.

This notice aims to inform candidates about the manner and purposes of processing their personal data by OKTA, as well as the principles and legal grounds applied during the processing of your personal data throughout the recruitment, selection, and scholarship awarding process.

As the controller of your personal data, OKTA processes it in accordance with best privacy protection practices, particularly in compliance with the Law on Personal Data Protection (Official Gazette of the Republic of North Macedonia No. 42/20, 294/21, and 101/25) (hereinafter referred to as: LPDP).

2. Responsibility for Processing Personal Data (Controller of Your Personal Data)

OKTA is responsible for the collection and processing of your personal data during the recruitment, selection, and scholarship awarding process at OKTA.

3. Purposes of Processing Personal Data

Your personal data is processed for the following purposes:

- Reviewing, analyzing, and evaluating submitted applications for specific job positions, internships, and scholarship awards
- Establishing and maintaining continuous communication with candidates throughout the entire selection process
- Verifying and processing the submitted personal data and documents for the purposes of candidate selection, including collecting data from third parties if necessary for selection purposes
- Identifying and selecting the most suitable candidates to fill open job positions, according to pre-established criteria
- Preparing and concluding employment contracts, internship agreements, scholarship award agreements, and conducting all relevant activities related to the selection process
- Informing candidates about the status of their application and all relevant activities related to the selection process via email, phone calls, or other appropriate communication channels
- Responding to potential complaints, requests, or legal proceedings related to this process and its outcomes in the context of your application

4. Methods of Collecting Your Personal Data

Within the recruitment and selection process, OKTA collects and processes your personal data through the following channels and sources:

- **Directly from you**, when you submit your professional résumé (CV), cover letter, or other relevant documents via email or through official application channels
- **Through employment agencies and platforms**, when you apply for a job posting, as well as platforms for internship or scholarship applications
- **Via recommendations from third parties**, such as your professional referees or supporters of your application, including by contacting the individuals you listed in your application to provide a reference for you
- **From educational institutions or organizations**, if your name and contact details are submitted as part of an internship or scholarship program
- **From former and/or current employers**, if you have listed them to provide a reference for you
- **From other publicly available sources**, such as professional social media profiles (e.g., LinkedIn)

5. Personal Data Collected by OKTA

At various stages of the recruitment, selection, internship, or scholarship awarding process, OKTA collects and processes different categories of personal data from candidates.

Typically, the data collected and reviewed are those voluntarily submitted by you through your résumé, cover letter, application, or other documents for a specific job position, internship, or scholarship.

At this stage, it is your responsibility to ensure that the data you send to us as part of your application is accurate, up to date, and complete.

During the selection process — including interview stages and final evaluation—additional information about you may be collected, both from third parties (e.g., references from former or current employers) and from publicly available sources, in order to better assess your suitability for the position.

Categories of personal data processed during the selection process:

- **Identification and contact data:** Name and surname, contact details (address, email, and phone number), as well as professional networking profiles (e.g., LinkedIn)
- **Data on your education, qualifications, and skills:** Résumé (CV), academic history, professional experience and employment history, skills and qualifications, participation in training programs, personal and professional interests, languages spoken, references provided by individuals who have worked with or employed you, and other data included in your résumé, cover letter, or collected through interviews and other qualification assessment processes (questionnaires, testing, etc.), as well as any other documents you submit as a candidate for employment, internship, or scholarship

- **Health-related data:** Information about your health status, if required under legal regulations, for the purpose of assessing your ability to perform the duties required by the job position. In such cases, OKTA will not process special categories of personal data, even if such data is provided without our request and/or unintentionally. OKTA will delete all documents and sources containing special categories of data when there is no legal basis for retaining them
- **Data specific to scholarship candidates:** Nationality, photograph, copy of ID card or passport, diploma and transcript of records, enrollment certificate, letter of acceptance to a postgraduate program, recommendation letters from university professors, financial information (if required for scholarship awarding), proof of enrollment, and other relevant documents for participation in the scholarship program
- **Other data:** Any data voluntarily provided by you

You are not legally or contractually obligated to provide your personal data during the employment, internship, or scholarship application process. However, failure to provide the necessary data may result in our inability to properly assess your application for the purposes of candidate selection at OKTA.

5. Purpose and Use of Your Personal Data at OKTA

- **To conclude and execute contracts** for employment, internship, or scholarship, and to carry out all necessary activities before and after formalizing the contractual relationship with OKTA, including responding to your requests during the application process
- **To fulfill legal and contractual obligations:** This processing is necessary for OKTA to meet its legal and contractual duties, including meeting legal regulations such as employment registration, reporting scholarships or internships, and assessing your ability to perform job-related tasks
- **To conduct the selection and evaluation process:** Administering all activities related to candidate selection, such as interviews, testing, and choosing candidates for employment, internships, or scholarships
- **For communication and notification:** Establishing and maintaining communication with candidates throughout the selection, evaluation, and assignment process for a job, internship, or scholarship
- **To protect OKTA's legitimate interests:** Responding to requests and defending our interests in legal disputes

6. When Is Your Explicit Consent Required?

If your application does not result in a contract, your personal data and résumé may only be stored and processed based on your consent. This data may be used for future employment, internship, or selection opportunities. You have the right to withdraw your consent at any time, and doing so will not affect your future candidacy.

7. Who May Receive Your Personal Data? Will It Be Transferred?

Your personal data may be processed by authorized personnel in the Human Resources Department and, if necessary, provided in anonymized form to the Evaluation Committee.

OKTA may transfer your data to service providers involved in the selection process, such as consulting and professional HR services, employment agencies, or other service providers, as well as educational institutions and organizations participating in internship or scholarship programs. This is always done in accordance with applicable legal frameworks and based on signed agreements and data protection obligations.

In certain cases, third parties may access your personal data, but only if necessary to fulfill the purposes for which the data was collected. Before disclosing information to third parties, OKTA ensures that each recipient is bound by strict security and confidentiality measures.

We will not share your personal data with third parties without your consent, except when required by law or upon request from the police, court, or other legal authority.

8. Transfer of Personal Data

Personal data will not be transferred to third countries outside the European Union, NATO, or the European Economic Area.

If OKTA transfers personal data to third countries outside the EU, NATO, or EEA, appropriate measures will be taken to ensure an adequate level of data protection, including the use of data processing agreements (standard contractual clauses issued by the European Commission or the Personal Data Protection Agency, other contractual clauses, or protective mechanisms).

9. How Long Will We Retain Your Personal Data?

Personal data collected during the recruitment, internship, or scholarship process will be retained for the period necessary to fulfill the purposes for which it is processed, in accordance with applicable laws and OKTA's internal policies.

For employment purposes at OKTA, if you are not selected for the specific position you applied for, the personal data collected from your job application will be retained for six (6) months after the completion of the recruitment process for which you applied.

If we receive your clear and explicit consent that your data collected for employment purposes at OKTA may be retained and used beyond this period, it will be stored and used for an additional six (6) months after the initial six (6) months following the completion of the recruitment process for which you applied.

The personal data of interns and scholarship candidates is retained no longer than necessary to fulfill the purposes for which it is processed, i.e., for a maximum of 10 years after the completion or termination of the scholarship/internship, unless there is another legal obligation requiring a longer retention period. After this period, the data will be securely deleted or anonymized.

10. Automated Decision-Making and Profiling

Your personal data will not be used for automated decision-making, including profiling, that could produce legal effects or significantly affect you.

11. What Are Your Rights Regarding Personal Data Protection?

As a data subject, you have the following rights:

- Right to be informed about the processing of your personal data
- Right of access to your personal data and to receive a copy
- Right to rectification and erasure of personal data if it is incomplete, inaccurate, unlawfully processed, or if the purpose of processing has been fulfilled
- Right to restrict processing if:
 - You contest the accuracy of the data (for the period needed to verify it)
 - The processing is unlawful, but you oppose deletion and request restriction instead
 - We no longer need the data, but you require it for legal claims
 - You object to processing based on our legitimate interests, pending verification of whether our interests override yours
- Right to object to processing based on legitimate interest
- Right to data portability, i.e., to receive your personal data in a structured, machine-readable format or to have it transferred to another company, when processed automatically based on a contract or your consent

12. How to Exercise Your Rights and Where to Find More Information

If you have any questions, requests, or complaints regarding the processing of your personal data by OKTA and/or your rights, please contact our Data Protection Officer: Marija Peshevska-Stanishikj via Phone: +389 2 2532 150 or email: MPeshevskaStanishikj@helpe.gr

You also have the right to file a complaint with the Agency for Personal Data Protection (AZLP) if you believe your data protection rights have been violated. You can do so by:

- Email: info@privacy.mk
- Website: <https://dzlp.mk/prizlnlp>

13. Changes to the Personal Data Processing Notice

OKTA reserves the right to modify and update this Personal Data Processing Notice when necessary, due to legal, technical, or business-related changes.