

Privacy Notice for Job Applicants at Black Point

1. Introduction

Black Point LLC (hereinafter “Black Point,” “we,” “us,” or “our”) is a company registered in the Republic of Armenia.

We are committed to protecting your personal data in accordance with the Law of the Republic of Armenia on Personal Data Protection, the EU General Data Protection Regulation (GDPR), and other applicable international data protection laws.

This Privacy Notice explains how we collect, use, and protect the personal data of job applicants worldwide.

By submitting your application, you consent to the processing of your personal data as described in this Notice, to the extent required by applicable law

2. Data Controller

The data controller for your application is:

Black Point

10/6 Gai str., Yerevan, Republic of Armenia

careers@blackpoint.art

If you have any questions about this notice or how we handle your data, please contact us using the details above.

Note regarding EU Representative (Article 27 GDPR):

Black Point LLC is established in the Republic of Armenia and may occasionally process personal data of individuals located in the European Economic Area (EEA) in connection with recruitment activities.

Such processing is limited in scope, non-continuous, and does not involve large-scale or high-risk data processing.

Therefore, under Article 27(2)(a) GDPR, Black Point LLC is not required to appoint an EU representative.

Nevertheless, we remain fully committed to complying with the GDPR and to cooperating with EEA supervisory authorities when necessary.

3. What Personal Data We Collect

We collect the personal data you voluntarily provide as part of your job application. This may include:

- **Contact Information:** Name, email address, phone number, home address.
- **Professional Information:** Resume/CV, cover letter, work experience, education history, skills, qualifications, references.

- **Position Details:** Salary expectations, desired position, notice period.

We kindly ask you to avoid submitting any Special Categories of Personal Data (such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health data, or sexual orientation) in your application documents. If such information is not required for the recruitment process, please do not include it.

4. How We Use Your Data (Purposes and Legal Basis)

We use your personal data for the following purposes:

- **To assess your qualifications for an open position and manage the recruitment process.** Our legal basis for this processing is that it is **necessary to take steps at your request prior to entering into a potential contract** (Article 6(1)(b) of the GDPR).
- **To communicate with you** regarding your application and schedule interviews.
- **To verify the information you have provided**, where applicable.
- **To compliance with legal obligations** under applicable employment laws;
- **To legitimate out interest** in managing recruitment and maintaining records;

If we wish to keep your data on file for future vacancies beyond the initial application process, we will seek your **explicit consent** for this specific purpose.

5. Data Sharing and International Transfers

- **Internal Sharing:** Your application may be reviewed by recruiters and hiring managers within the Black Point international group of companies, strictly on a need-to-know basis.
- **Service Providers:** We use trusted third-party service providers (data processors) who assist us in our operations, such as hosting providers, and applicant tracking systems. These providers are contractually bound to protect your data and not use it for any other purpose.
- **International Transfers:** Black Point is headquartered in Armenia, a country recognized by the European Commission as providing an adequate level of data protection. If your data needs to be transferred to other countries outside the European Economic Area (EEA), we will ensure such transfers are protected by appropriate safeguards, such as the European Commission's Standard Contractual Clauses (SCCs). For applicants from other regions (e.g., the United States, Canada, Latin America, or Asia-Pacific), we handle your data in accordance with local privacy regulations, ensuring that your data is protected to the same high standard.

6. Data Retention

We will retain your personal data only for as long as necessary to fulfill the purposes for which it was collected.

- For unsuccessful applications, we typically delete data within **12 months** from the end of the recruitment process.
- If you have given us your **consent** to retain your data for future opportunities, we will keep it for a period of **24 months**, after which it will be securely deleted or we will seek to renew your consent.

7. Your Rights

Under applicable data protection laws, including the GDPR, you have the following rights regarding your personal data:

- **Right of Access:** To request a copy of your personal data we hold.
- **Right to Rectification:** To correct inaccurate or incomplete data.
- **Right to Erasure (Right to be Forgotten):** To request the deletion of your data.
- **Right to Restriction of Processing:** To request we temporarily stop processing your data.
- **Right to Data Portability:** To receive your data in a structured, machine-readable format.
- **Right to Object:** To object to certain types of processing.
- **Right to Withdraw Consent:** If processing is based on consent, you may withdraw it at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

To exercise any of these rights, please contact us at careers@blackpoint.art.

You also have the right to lodge a complaint with a supervisory authority in your country of residence.

8. Data Security

We have implemented appropriate technical and organizational measures to protect your personal data against unauthorized access, alteration, disclosure, or destruction.

Access to personal data is limited to authorized personnel only, and all transmissions are protected using encryption and secure storage systems.

9. Changes to This Notice

We may update this Privacy Notice from time to time. The most current version will always be posted on this page with the updated "Last Revised" date.