

Candidates Personal Data Retention Policy

Purpose and Scope

This policy defines the principles and procedures for retaining and deleting personal data collected from job candidates throughout the recruitment process, regardless of the stage the candidate reaches.

CoinsPaid, as a European-based organization, is subject to the provisions of **Regulation (EU) 2016/679 (General Data Protection Regulation or GDPR)** on the protection of personal data. In accordance with Article 5(1)(e) of the GDPR, data controllers must establish clear limitations on the duration for which personal data is stored.

CoinsPaid is committed to upholding the principle of storage limitation by defining retention periods for all candidate data and ensuring that such data is not kept longer than necessary for recruitment or legal purposes.

Data Categories and Retention Periods

Data Categories

- When applying for a position at CoinsPaid, candidates are required to provide certain personal data necessary for assessing and processing their application. The type and scope of information collected may vary depending on the stage of the recruitment process. The personal data may include, but is not limited to, the following categories:
- **Identification and Contact Information** such as full name, country and city of residence, home address or equivalent (for successful candidates during onboarding).
- **Demographic Details** such as date of birth, age, gender.
- **Communication Records** such as call recordings (e.g., interview conversations).
- **Social and Public Profile Data** such as social media posts or content made publicly available by the candidate, expressed interests, likes, dislikes, and publicly shared opinions, stated goals, personal objectives, and professional intentions

All personal data collected and processed during the recruitment process is documented in our internal records of processing activities and, for transparency purposes, reflected in our public Privacy Notice.

Retention Periods

Category 1: First Stage CV Screening - Not Progressed

Description: Candidates whose CVs were reviewed but did not progress beyond initial screening

- **Retention Period:** 1 year from application date
- **Rationale:** Brief retention for potential reconsideration and compliance purposes
- **Data Included:** CV, cover letter, application form, initial screening notes

Category 2: Overqualified Candidates

Description: Candidates who possess qualifications exceeding current role requirements

- **Retention Period:** 2 years from application date
- **Rationale:** Future opportunities may arise that match their qualifications
- **Data Included:** CV, application materials, qualification assessments, talent pool notes
- **Review Requirement:** Data reviewed annually for continued relevance

Category 3: Interview Stage - Soft Skills Rejection

Description: Candidates who completed interviews but were rejected due to insufficient soft skills

- **Retention Period:** 2 years from interview date
- **Rationale:** Understanding rejection patterns and maintaining interview assessment records
- **Data Included:** CV, interview notes, soft skills assessments, rejection rationale
- **Note:** These candidates are normally not considered for future recontact

Category 4: Interview Stage - Hard Skills Rejection

Description: Candidates who completed interviews but were rejected due to insufficient technical/hard skills

- **Retention Period:** 2 years from interview date
- **Rationale:** Potential future suitability once skills are developed
- **Data Included:** CV, interview notes, technical assessments, skills gap analysis, development recommendations

Category 5: Fully Qualified - No Current Position

Description: Candidates who successfully passed all assessment stages but no suitable position was available

- **Retention Period:** 2 years from interview completion
- **Rationale:** Priority candidates for future similar roles
- **Data Included:** Complete application file, all assessment results, interview feedback, position matching notes
- **Review Requirement:** Quarterly review for new position alignment

Category 6: Successful Candidates - Hired

Description: Candidates who were successfully hired through the recruitment process

- **Retention Period:**
 - **CVs and application materials:** 1 year after employment termination
 - **Interview notes, assessments, and recruitment comments:** Retained according to the HR Personal Data Retention Policy (unless litigation circumstances apply)
- **Exception:** In case of ongoing litigation or disputes, all recruitment data is retained until legal matters are fully resolved and for the statutory terms afterward
- **Data Included:** All recruitment-related documentation becomes part of employee record management

Data Security

Controlled Deletion of Candidate Data

The configuration of candidate data deletion terms is restricted to **authorized recruitment team members and designated hiring managers**. To ensure accountability, all deletion actions are logged and retained for audit purposes. **Periodic reviews** are conducted to verify that only individuals with appropriate permissions can initiate or modify deletion processes.

Data Subject Rights

Without prejudice to the Right to Erasure (Right to be Forgotten), as provided under the GDPR, candidates may request the deletion of their personal data before the end of the standard retention period. Such requests will be honored unless CoinsPaid has a legitimate basis to retain the data, such as, for example, compliance with a legal obligation or the need to preserve evidence in the context of ongoing or potential litigation.

Data Deletion Procedure

CoinsPaid implements a structured approach to candidate data deletion, incorporating both automation and oversight to ensure compliance and accountability.

Automated Deletion

Where technically feasible, systems are configured to flag data approaching the defined retention limits and initiate automated deletion processes. For scenarios requiring discretion or context-based decisions, a manual review is performed by authorized personnel.

Deletion Verification

All deletion activities, automated or manual, must be logged and independently verified. This includes confirmation that data has been removed from all relevant systems, backups, and archives. Deletion records are retained for audit and compliance purposes.

Regular Review and Monitoring

Policy Review

This policy will be reviewed on an annual basis or sooner if significant regulatory changes occur. Retention periods may be updated to reflect evolving legal requirements or legitimate business needs.

Contact Information

For questions about this policy or data protection matters related to candidate data, contact:

- Recruitment Team: [Alexandra Kuzminova](#)
- Data Protection Officer: [Dmytro Pigul](#)
- Legal Department: [Oleksandra Malichenko](#)

Policy Effective Date: 22/10/2025

Next Review Date: 01/03/2026

Version: 1.0