

Privacy Notice for Candidates and Workers

Document control	
Document	Privacy Notice for Candidates and Workers
Number	UW-NOT-01
Version	2.0 of 12 October 2026. Replaces version 1.0 of October 2026
Controller	LIMITED LIABILITY COMPANY «UKRAINE WORKS CONSULTING», identification code 46148417
Approved by	Order of the Director of LLC «UKRAINE WORKS CONSULTING», Anzhelika Kolomiyets, of 12 October 2026
Parent document	Ethical Recruitment Policy (UW-POL-01), clause 18
Review	At least once every twelve months and on any change in the processing described
Authentic text	Ukrainian. Candidates receive a plain-language summary of this notice in English, Hindi or Nepali; the full text is published on ukraineworks.com.ua and given on request

1. The controller

1.1. The controller of your personal data, within the meaning of Article 2 of the Law of Ukraine "On Personal Data Protection" No. 2297-VI of 1 June 2010 ("the Law"), is LIMITED LIABILITY COMPANY «UKRAINE WORKS CONSULTING», 42 Holosiivskyi Avenue, office 307, Kyiv, 03039, Ukraine ("the Company", "we").

1.2. Questions and requests about your personal data may be sent to info@ukraineworks.com.ua, made by a message or a call on WhatsApp or Telegram to +380 99 878 1755, or sent by post to the address in clause 1.1. Our Ethical Recruitment Officer answers them (section 11).

2. Who and what this notice covers

2.1. This notice applies to every person whom the Company considers for employment with an employer in Ukraine ("Candidate") and to every Candidate who accepts such employment ("Worker"). It also applies to the family member whom you name as your emergency contact and, as regards the data in a complaint file, to any other person who makes a complaint to us or gives information in one (section 15).

2.2. It describes the processing carried out by the Company. The recruitment agency in your country ("Recruitment Partner") collects your data and passes them to the Company; for vacancies of the Company it uses them only on the Company's instructions and for the purposes in section 5. Where the law of its own country requires the Recruitment Partner to keep records of its recruitment, it keeps them as a controller in its own right and answers for them under that law. The employer in Ukraine becomes a separate controller of the data it receives and processes them under the labour legislation of Ukraine.

2.3. This notice, or its plain-language summary in English, Hindi or Nepali, is given to you in fulfilment of Article 12(2) of the Law, before your data are collected, together with the Consent to the Processing of Personal Data (UW-F-11). Where the summary differs from this notice, this notice applies; a person who relied on the summary is not placed at a disadvantage by the difference.

3. Personal data we process

Category	Data
Identity	Name, date and place of birth, nationality, sex, photograph
Passport	Copy of the passport and the particulars it contains
Contact	Telephone, e-mail address, home address; name and telephone of a family member to be contacted in an emergency

Category	Data
Qualifications and experience	Education, employment history, skills, certificates, languages; results of interviews and skills tests, including photographs or video of a test where one is recorded
Documents required by authorities or by the employer	Police clearance certificate, where a public authority requires one or the employer requires one because of the nature of the work (section 6)
Health	Medical insurance; a medical certificate, where a public authority or the nature of the work requires one
Migration and travel	Applications for the work permit, the visa and the residence permit and the decisions on them; taxpayer registration number; travel bookings; address of accommodation in Ukraine
Recruitment records	The offer and the employment contract; the Cost Disclosure Statement and the evidence of what you paid; the record of your pre-departure orientation; your pre-departure declaration; the records of our contacts with you after arrival
Communications	Your messages, questions, complaints and our replies

3.1. We do not collect data on your religion, caste, ethnic origin, political opinions or trade union membership, and we do not ask for a pregnancy test or an HIV test.

3.2. We collect only the data needed to assess your suitability for a vacancy and to arrange your documents, travel and employment (Article 6 of the Law).

4. Where the data come from

4.1. We receive your data from you; from the Recruitment Partner; from the employer (interview results and the offer of employment); and from the public authorities that decide on your permit, visa and residence permit.

5. Purposes and legal grounds

Purpose	Data used	Legal ground under the Law	If you do not provide the data
Assessing you for a vacancy and presenting your profile to an employer	Identity, contact, qualifications and experience	Your consent (Article 11(1)(1)); steps taken at your request before a contract is concluded (Article 11(1)(3))	We cannot consider you for the vacancy
Preparing the employment contract and the applications for the work permit, the visa and the residence permit	Identity, passport, qualifications, migration data; a medical certificate and a police clearance certificate where required (section 6)	Article 11(1)(3); your consent (Article 11(1)(1)); for the medical certificate and the police clearance certificate, your unambiguous consent (Article 7(2)(1))	The employer cannot obtain a work permit for you and the recruitment cannot continue
Arranging medical insurance, travel and arrival, your taxpayer registration and, where we assist with it, a bank account	Identity, passport, contact, health (insurance), migration and travel data	Article 11(1)(3); your consent (Article 11(1)(1)); for the insurance, your unambiguous consent (Article 7(2)(1))	We cannot arrange the insurance, the journey, the registration or the account
Verifying your age and that the recruitment complied with our Ethical Recruitment Policy	Passport, cost and orientation records, your declaration	Our legitimate interest in verifying your age and that the recruitment was lawful and complied with our Policy (Article 11(1)(6)); so far as the check concerns the prohibition on taking payment from you, our duty under Article 37(2) of the Law of Ukraine "On Employment of the Population" (Article 11(1)(5))	The recruitment cannot continue

Purpose	Data used	Legal ground under the Law	If you do not provide the data
Contacting you after arrival and handling your questions and complaints	Contact, communications, recruitment records	Your consent (line 2 of form UW-F-11); our legitimate interest in checking that the terms promised to you are kept and in resolving a complaint (Article 11(1)(6))	We cannot answer you; an anonymous complaint is still examined
Protecting you in an emergency: informing the police, the emergency medical service, your embassy or consulate and your family	Your name, where you are and the facts of the emergency; name and telephone of your emergency contact	Protection of your vital interests (Article 11(1)(4)) and your consent on line 10 of form UW-F-11. For the data of your emergency contact: our legitimate interest, and yours, in being able to protect your life and health (Article 11(1)(6)); you confirm on line 7 of form UW-F-11 that you have told that person that you gave us the name and number, and why (Article 12(2))	We have no one to inform
Keeping the records of your recruitment for the periods in section 9 and answering legal claims	Data in your file	Our legitimate interest in being able to show how you were recruited and to answer a claim (Article 11(1)(6)); a duty to keep a record, where a law imposes one (Article 11(1)(5))	Not applicable
Offering you other vacancies (optional)	Identity, contact, qualifications	Your separate consent (line 5 of form UW-F-11)	We delete your profile as stated in section 9

6. Health data and data on criminal convictions

6.1. Data concerning health and data on criminal convictions belong to the categories whose processing Article 7(1) of the Law prohibits unless a ground in Article 7(2) applies.

6.2. We process your medical insurance and a medical certificate only where a public authority or the nature of the work requires the document. We process a police clearance certificate only where a public authority requires it, or where the employer requires it because of the nature of the work, has stated the requirement in the job order before the search began, and we have checked that the work does require it (form UW-F-13, line 13 of Part A and line 9 of the review note). In each case the only ground is your unambiguous consent (Article 7(2)(1) of the Law), which you give on line 4 of form UW-F-11.

6.3. The result of a medical examination is used only to establish what the public authority or the nature of the work requires. No Candidate is rejected or ranked on any other finding in it.

7. Recipients

7.1. We disclose your data only to the following recipients, and to each only the data that it needs for the reason stated (disclosure on a need-to-know basis).

Recipient	Data disclosed	Reason
The employer in Ukraine that is considering you or has hired you	Identity, passport, qualifications and experience, documents required for the permit	Selection; the work permit application; the employment contract
The Recruitment Partner in your country	Data needed to process your application; the decisions of the employer and of the authorities	Recruitment on our behalf
Public authorities of Ukraine and visa centres acting for them: the employment centre, consular posts and visa centres, the State Migration Service, the tax service	Data required by the application concerned	Work permit, visa, residence permit, taxpayer registration

Recipient	Data disclosed	Reason
The consulate of a transit State	Data required by the visa application	Transit visa, where your route requires one and we assist with it
The insurer	Identity, passport, period of cover	Medical insurance
The bank in Ukraine	Identity, passport, taxpayer number	Opening of an account, where we assist with it
Translators and notaries	The documents to be translated or certified	Preparation of documents
Carriers and ticket agents	Identity, passport	Travel bookings, where we make them
Providers of our e-mail, messaging and data-storage services	Data held in those systems	Technical operation, under a duty of confidentiality
The police, the emergency medical service, your embassy or consulate and your emergency contact	Your name, where you are and the facts of the emergency	Protection of your life, health or liberty
A translator or an independent reviewer engaged for a complaint	The complaint and the documents it concerns	Handling of the complaint, under a duty of confidentiality
An auditor engaged to check our recruitment practice	Data in the files examined	Verification, under a duty of confidentiality

7.2. We do not sell personal data and do not disclose them to advertisers, lenders or any recipient not listed above, unless a law or a decision of a court requires it.

7.3. On the day it is made, our Ethical Recruitment Officer enters each disclosure to a recipient listed above in the Personal Data Disclosure Log (R-07) with the date, the recipient, the data, the purpose and the ground. The storage of data with a provider of e-mail, messaging or data-storage services is entered once, when the provider is engaged. You may ask to see the entries that concern you (section 11).

7.4. The employer is bound by point 19 of the Employer's Undertaking (UW-F-06), and the Recruitment Partner by clause 14 of the Code of Conduct for Recruitment Partners, to keep your data confidential and to use them only for your recruitment and employment.

7.5. The disclosures in the table are made on the following grounds.

(a) Rows 1 to 8 (the employer, the Recruitment Partner, the public authorities of Ukraine, the consulate of a transit State, the insurer, the bank, translators and notaries, carriers and ticket agents): your consent on lines 2 and 3 of form UW-F-11 and, for data concerning health and for the police clearance certificate, on line 4.

(b) Row 9 (providers of e-mail, messaging and data-storage services): the providers act on our instructions and use the data for no purpose of their own; you consent on line 3 to the keeping of data on their servers.

(c) Row 10 (an emergency): your consent on line 10. Where you answered No on that line or cannot be asked, we inform the police or the emergency medical service only so far as is needed to protect your vital interests (Article 11(1)(4) of the Law).

(d) Row 11 (a translator or an independent reviewer engaged for a complaint): they act on our instructions, under a written duty of confidentiality, to handle a complaint that you made; you also consent on line 8. Where you answered No on that line, we handle the complaint without them so far as we can and ask you again where we cannot.

(e) Row 12 (an auditor): your consent on line 9. Where you answered No on that line, the auditor examines your file with your name and contact details removed.

8. Transfer of data between States

8.1. Your data are transferred from your country to Ukraine because the employment is in Ukraine, and from Ukraine to the Recruitment Partner in your country. Providers of our e-mail, messaging and data-storage services keep data on servers outside Ukraine. The Personal Data Disclosure Log names each provider, and we tell you on request which provider holds your data and in which State.

8.2. Under Article 29(3) of the Law, personal data may be transferred to a State that ensures an adequate level of protection; the Law treats the member States of the European Economic Area and the States that have signed the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data as such States. Where the recipient is in another State, we transfer your data only on a ground stated in Article 29(4) of the Law: your unambiguous consent, given on line 3 of form UW-F-11, or the need to conclude or perform a contract made in your interest.

9. How long the data are kept

Case	Period
You are not selected, or you withdraw	Deleted within 3 months after the selection for the vacancy is completed, that is, after the day on which the employer informs us of its choice or withdraws the vacancy
You are not selected, or you withdraw, and you agreed on line 5 of form UW-F-11 that we keep your profile for other vacancies	24 months from our last contact with you. You may ask for earlier deletion at any time
You are placed with an employer	3 years after our work on your placement ends, which is the day your employment with that employer ends or, if you return home, the day your return is completed
You accepted an offer and the recruitment ended before you started work	3 years after the day on which the recruitment ended
Records of a complaint	3 years after the complaint is closed
A person found to be under 21	Deleted within 3 months after the recruitment is stopped, except the record that the recruitment was stopped and why, the record of any repayment and, for a person under 18, the record of the measures taken for that person's return, which are kept for 3 years

9.1. At the end of the period our Ethical Recruitment Officer deletes the electronic data, destroys the paper copies and records the date in the Index of Candidate and Worker Files (Article 15 of the Law). Data are kept longer only where a law requires it or a legal claim is pending, and then only for that purpose. The name and telephone of your emergency contact are kept for the same period as your own data. The Recruitment Partner deletes its copy of the data of a Candidate who is not selected or who withdraws within the periods in the first two rows, and keeps the records of a placed Worker for 3 years after departure (clause 18.3 of the Code of Conduct for Recruitment Partners), except a record that the law of its country requires it to keep longer (clause 2.2).

10. Security

10.1. We protect personal data against accidental loss or destruction and against unlawful processing and access (Article 24 of the Law) by the following measures. Your file is kept in electronic form in one storage system. Each member of our staff uses an individual account protected by a password, which is closed on the day that person stops recruitment work. Paper documents are kept in a locked cabinet in our office. Our staff do not process your data in personal e-mail or messaging accounts.

10.2. Access to your file is limited to the members of our staff who work on your recruitment. Each of them has signed a confidentiality undertaking.

10.3. We work from copies and do not keep your original documents.

10.4. The Recruitment Partner is bound by clause 14.3 of the Code of Conduct for Recruitment Partners to notify us within 72 hours of any loss, leak or unauthorised access to your data. Where your data are affected by a loss, a leak or unauthorised access, with us or with the Recruitment Partner, we inform you within 72 hours after it is reported to our Ethical Recruitment Officer and tell you which data were affected and what we have done.

11. Your rights

11.1. Under Article 8 of the Law you have the right:

- (a) to know the sources of your data, where they are kept, the purpose of the processing and the recipients;
- (b) to have access to your data and to obtain a copy;
- (c) to receive, not later than 30 calendar days after we receive your request, an answer as to whether your data are processed and what they contain;
- (d) to object, giving reasons, to the processing of your data;
- (e) to require, giving reasons, that your data be corrected or destroyed where they are inaccurate or are processed unlawfully;
- (f) to withdraw your consent;
- (g) to the protection of your data against unlawful processing, accidental loss, destruction or damage;
- (h) to be protected against a decision that is made by automated means alone and has legal consequences for you;
- (i) to complain to the Ukrainian Parliament Commissioner for Human Rights or to a court;
- (j) to make reservations, when you give consent, that limit our right to process your data;
- (k) to know how your data are processed by automated means;
- (l) to use the legal remedies available where the legislation on personal data protection is breached.

11.2. To exercise a right, write to us or call us by any means stated in clause 1.2. We acknowledge your request within 3 working days and answer it within 30 calendar days of receiving it. The answer states what we have done or, where we do not do what you ask, the reason and where you may complain (section 15). Where we delete data at your request, we instruct the Recruitment Partner to delete its copy, and it is bound to do so within 10 working days, except the records that it must keep under clause 18 of the Code of Conduct for Recruitment Partners or under the law of its country (clause 14.4 of that Code). No fee is charged.

11.3. We may ask you to confirm your identity before we disclose data, so that they do not reach another person.

12. Consent and its withdrawal

12.1. You give consent on form UW-F-11 after this notice, or its summary, has been given and explained to you in a language you understand. Each consent is on a separate line of the form, and you answer Yes or No on each line. Lines 2, 3 and 4 are needed for the recruitment: section 5 states what follows if you answer No. Lines 5, 8, 9 and 10 are optional: your answer on them has no effect on your application. You may write on the form any reservation that limits a consent (clause 11.1(j)).

12.2. You are free to refuse consent, and to withdraw it at any time by any means stated in clause 1.2. Withdrawal does not affect processing carried out before it.

12.3. Where you withdraw consent, or ask for the deletion of data that a permit or visa application requires, we cannot continue with that application. We will tell you this before we act on your request, so that you can decide.

12.4. Nobody may charge you or penalise you for refusing or withdrawing consent. The only consequence of a refusal or withdrawal is the one stated in section 5 or in clause 12.3.

13. No automated decisions

13.1. We do not make decisions about Candidates by automated means. Selection is made by our personnel and by the employer.

14. Minimum age

14.1. We recruit only persons aged 21 or over. Where a Candidate is found to be younger before departure, the recruitment is stopped and the data are deleted as stated in section 9.

15. Complaints

15.1. You may complain to us by any means stated in clause 1.2. A complaint about personal data is handled under our Grievance and Remedy Procedure (UW-PRO-01): we acknowledge it within 3 working days and give you a reasoned decision within 10 working days of receiving it or, where the facts cannot be established in that time, within the period fixed in clause 13.4 of that Procedure. A complaint costs nothing, and nobody may penalise you for making one.

15.2. You may at any time complain to the Ukrainian Parliament Commissioner for Human Rights, who supervises compliance with the legislation on personal data protection (Articles 22 and 23 of the Law): 21/8 Instytutska Street, Kyiv, 01008, Ukraine; hotline 1678 (free of charge in Ukraine); from outside Ukraine +380 44 299 74 08; hotline@ombudsman.gov.ua. You may also apply to a court.

15.3. The Recruitment Partner is separately responsible for complying with the data-protection law of its own country, including, so far as their provisions are in force and apply to it, the Digital Personal Data Protection Act, 2023 (India) and the Privacy Act, 2075 (2018) (Nepal). You may complain to us about the way a Recruitment Partner handles your data; we handle the complaint under the Procedure named in clause 15.1.

16. Changes to this notice

16.1. A new version of this notice is published on ukraineworks.com.ua with its date. Recruitment Partners give Candidates the plain-language summary in their language. Where a change affects the purposes for which your data are used or the recipients, we inform you, by a message to the telephone number or e-mail address in your file, before the change takes effect and, where the Law requires it, ask for your consent again.