

PROCEDURES ON THE PROCESSING OF THE PERSONAL DATA

These Procedures on the Processing of Personal Data are recorded in relation to the prospective employer of the undersigned data subject affiliated to the group of Grand Circle Corporation (USA) including those listed above (the "**Grand Circle Group**") as identified in the relevant employment contract (the "**Employer**"):

1. The undersigned (the "**Data Subject**") affirms that all personal data provided by the Data Subject to the Employer (the "**Personal Data**") is accurate and up to date. The Data Subject acknowledges the processing by the Employer is necessary for evaluating of hiring and/or employing the Data Subject.
2. The Employer shall process the Personal Data on the basis of and to the extent necessary for performance of the employment contract (the "**Employment Contract**") and for the purposes of compliance with any applicable legal regulations (the "**Applicable Regulations**"). The Data Subject hereby consents to the processing of any other Personal Data which the Data Subject has provided in the course of the hiring process or anytime thereafter for the purposes of: (i) establishment and performance of the Employment Contract; (ii) assessing the suitability and requirements for the relevant job position; and (iii) fulfilling the Employer's obligations under Applicable Regulations, including procurement of insurance and consents with collection of the Personal Data by copying, scanning or other recording of any official documents.
3. The Data Subject expressly acknowledges and consents that the Employer may:
 - (i) disclose (or provide) the Personal Data to the Employer's related companies within the Grand Circle Group and to Allianz Worldwide Care Limited (Ireland);
 - (ii) delegate processing of the Personal Data to a data processor of the Employer within the Grand Circle Group, particularly to **GCCL Slovakia s.r.o.** (Cintorínska 7, Bratislava 811 08, Slovakia) and/or **GRAND CIRCLE DUBROVNIK d.o.o.** (Dr. Ante Starčevića 45, Dubrovnik, Croatia);
 - (iii) carry out the cross-border transfer of Personal Data to countries in which the companies within the Grand Circle Group are seated including EU Member States and third countries which *do* guarantee an "adequate level of protection" and third countries which *do not* guarantee an "adequate level of protection" pursuant to the European Commission.

Save as provided herein, the Employer shall not provide, disclose or publish the Personal Data to third parties or recipients unless such provision or disclosure is required by or permitted under the Applicable Regulations and/or the Employment Contract.

4. The Employer shall be entitled to process data which has been provided by the Data Subject for the purposes of the Employment Contract or other data required for compliance with the Applicable Regulations (particularly any employment, social and tax regulations under the applicable laws). Furthermore, the Employer shall also be entitled to process data voluntarily provided by the Data Subject to the Employer in the course of the hiring process or anytime thereafter.
5. The Personal Data may be processed, and any consents for such processing, shall be valid until the Data Subject's relationship with the Employer is terminated and for a period of three years following the termination of such relationship; without limitation to any requirements to retain data under any applicable law.
6. Without limitation to any other rights of the Data Subject under applicable laws, upon application in writing, the Data Subject shall be entitled to request: (i) confirmation whether his/her Personal Data are being processed, (ii) exact information concerning the source from which the Employer obtained Personal Data, (iii) a list of the relevant Personal Data, (iv) rectification of inaccurate/incomplete data, (v) deletion of such data if (in respect of which) there was a violation of the law, (vi) the identification of the person who is receiving the Personal Data.

In confirmation of the above, the Data Subject affixes his/her signature:

Data Subject: in _____, on _____

Name: