

Privacy policy for applicants and recruitment

Data controller

EGN Group

Incl. Denmark, Sweden, Norway,
Finland, Germany, the Netherlands
and Singapore

Company registration number: - - -

1. **Introduction**

- 1.1 This data protection and privacy policy (the "**Policy**") describes how EGN Group ("**us**", "**we**" or "**our**") as data controller collects and processes personal information about you in connection with handling applications and recruitment processes.
- 1.2 The Policy is prepared and made available to comply with the (EU) General Data Protection Regulation (2016/679 of 27 April 2016) (the "**GDPR**") and the rules included herein on information to be provided to you.

2. **Types of personal data we process about you**

- 2.1 We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data: name, address, phone number, email address, CV, educational documents, references from former employees, personality tests, information from social media that is publicly available and relevant, social security number, date of birth. "In addition, we may also process the following types of personal data: (1) applications, (2) career history, (3) other types of personal data which could be included in the application, (4) information from a reference and (5) notes from job/hiring interviews.
- 2.2 We do not process sensitive personal data, i.e. the special category of personal data defined in article 9(1) of the GDPR.
- 2.3 When it is relevant, personal data is collected directly from the data subject or from external sources. In addition, personal data may be collected from other open sources like LinkedIn.
- 2.4 If we need to collect more personal data than what is specified above, we will inform about this. Such information may be provided by updating this Policy.

3. **Purposes for processing the personal data**

- 3.1 Your personal data collected and processed by us will be processed for the following purposes:
 - a) To process job applications and to recruit the relevant persons.
 - b) To prevent fraud.
 - c) To store and process personal data to the extent that it is a requirement under applicable law, including bookkeeping in accordance with applicable law.
 - d) To be able to create and maintain a directory of relevant candidates for positions at our company.

4. **Legal basis for processing personal data**

- 4.1 We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal
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data is done on the following legal basis:

- a) The processing is necessary for the purposes of the legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, cf. the GDPR, article 6(1)(f), including any specific rules on the processing of personal data in the employment context as provided in article 88 of the GDPR such as section 12(2) of the Danish data protection law.
- b) The processing is necessary in order to take steps at the request of the data subject prior to entering into a contract, cf. the GDPR, article 6(1)(b), last indent.
- c) The processing is necessary for the performance of a contract to which the data subject is party, cf. the GDPR, article 6(1)(b), the first indent.

5. **Disclosure and transfer of personal data**

- 5.1 We only pass on personal data to others when the law allows it or requires it.
- 5.2 We transfer personal data to the following recipients from the EU/EEA:
 - a) Data processors
 - b) Tax authorities (for example in connection with accounting etc.)
 - c) Banks (for example in connection with payments etc.)
 - d) Suppliers
 - e) Collaborators
- 5.3 From time to time we use external companies as suppliers to assist us in delivering our services. The external suppliers will not receive or process personal data unless the applicable law allows for such transfer and processing. Where the external parties are data processors, the processing is always performed on the basis of a data processing agreement in accordance with the requirements hereto under the GDPR. Where the external parties are data controllers, the processing of personal data will be performed based on said external parties' own data privacy policy and legal basis that the external parties are obligated to inform about unless the applicable legislation allows otherwise.
- 5.4 We transfer personal data to countries or international organisations outside the EU/EEA. We transfer personal data to USA. Such transfers are based on the recipients self-certifications under "EU-U.S. Privacy Shield". Read more about Privacy Shield on the websites of the national authorities or at www.privacyshield.gov.
- 5.5 If you have any questions about our use of data processors, cooperation with other data controllers, including subsidiary companies, or transfer of data to third countries, please contact us for more information or documentation of our legal basis for said transfers.

6. **Erasure and retention of personal data**

- 6.1 We ensure that the personal data is deleted when it is no longer relevant for the processing purposes as described above. We always retain personal data to the extent
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that it is an obligations from applicable law, as is the case with for example accounting and bookkeeping materials and records.

When the candidate becomes an employee, the employee's personal data from the application process are transferred/moved to regular HR management. If the candidate does not become an employee, the general rule is that the personal data is erased after 6 months in accordance with applicable law. Notwithstanding the above, specific reasons related to employment law may necessitate the continuous processing of the personal data. This may have different implications. For example, we may process the applications for a longer period to prove that there has been no unlawful discrimination in the selection process, when we consider this necessary. Similarly, it may be relevant to process the personal data for a limited period if a similar relevant position may become available during this period, or if another existing candidate opts out of the application process.

If you have any questions about our retention of personal data, please contact the email mentioned at the bottom of this Policy.

- 6.2 If the candidate consents to a longer retention period, we follow such period, for example if we process the application in such a limited time period to be able contact the candidate again if a vacancy occurs.

7. **Your rights as a data subject**

- 7.1 As a data subject under GDPR, you have number of rights that we can assist you with. Your rights include the following:
- 7.1.1 The right of access: You have the right to access the personal data we process about you, to obtain information about for what purposes we process the personal data is processes and whether we disclose or transfer your personal data to others.
 - 7.1.2 The right to rectification: You have a right to ask for rectification of inaccurate personal data concerning you.
 - 7.1.3 The right to erasure: In certain cases you have a right to obtain the erasure of personal data concerning you before the time when erasure would normally occur.
 - 7.1.4 The right to restrict processing: You have, in certain situations, a right to have the processing of your personal data restricted. If so, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest in the European Union or of an European member state.
 - 7.1.5 The right to object: You have, in certain situations, a right to object to the otherwise legal processing of your personal data. Objection can also be to the processing of personal data for the purpose of direct marketing when or if this occurs.
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7.1.6 The right to data portability: You have, in certain situations, a right to receive your personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance.

7.2 More information about data subject rights can be found in the guidelines of the national data protection authorities.

If you wish to make use of your rights as described above, please use the contact details provided at the end of this Policy.

We strive to do everything to meet wishes regarding our processing of personal data and the rights of data subjects. If you or others despite our endeavours wish to file a complaint, this can be done by contacting the national data protection authorities.

8. **Changes to this Policy**

8.1 We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the bottom of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example on our website or by direct message.

9. **Contact**

9.1 If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at gdpr@egn.com.

This is version 3, last updated 08.02.2020 13:48.

Yours sincerely,

EGN Group
