# Privacy policy for job Applications and recruitment

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# 1. Introduction

## 1.1 Scope

The privacy policy for job applicants in connection with the recruiting process (the ”**Policy**”) describes how the Organization (**"us", "we", or "our"**) collects and processes personal data relating to job applicants as part of the recruiting processes. We are committed to being transparent about how we collect and use your personal data and meeting our data protection obligations.

As a controller, we collect and process personal data about you when we handle your job application and during the recruiting process.

## 1.2 Framework

This Policy is prepared and made available to you to comply with the (EU) General Data Protection Regulation (2016/679 of 27 April 2016) (”**GDPR**”)

# 2. Types of personal data we process about you

## 2.1 Sensitive personal data

We do not process sensitive personal data, i.e., the special categories of personal data, as defined in GDPR, Article 9(1).

## 2.2 Credit information

We may process your credit information in RKI in connection with the recruitment process. The purpose of this is to assess whether your credit information is compatible with the requirements for the specific position. If this is the case, it will be done based on your explicit consent in accordance with Section 8(3) of the Data Protection Act.

## 2.3 Sources of personal data

As a general rule, we only collect personal data about you directly from you. If specific circumstances allow or require us to collect personal data about you from third parties, we will only do so when relevant and to the extent necessary. We will inform you hereof, which may be done by updating this Policy.

Personal data is collected from recruitment companies and headhunters when we have entered an agreement for a specific recruitment.

## 2.4 Further collection

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. Disclosure and transfer of personal data

We only transfer personal data to other entities when allowed or required to do so by applicable legislation.

# 4. Erasure and retention of personal data

We ensure that your 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 that we have a legal obligation, such as for example in the case of accounting and bookkeeping materials and records.

If you are offered a position and become an employee in the Organization, your personal data from the job application and data from the recruiting process are transferred/moved to our regular HR management system.

If you are not offered a position in the Organization, your 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 personal data. This may have different implications. For example, we may process the applications for a longer period to prove that there was 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 candidate opts out of the recruiting process.

If you have any questions about our retention of your personal data, please contact us by using the email mentioned under the last section of this Policy.

If you consent to a longer retention period, we follow such period, for example, if we process the job application in such a limited period to be able to contact you again in case of a suitable vacancy.

# 5. Your rights as a data subject

As a data subject under GDPR, you have a number of rights:

- You have the right to request access to the personal data we process about you, the purposes we process the personal data, and whether we disclose or transfer your personal data to others.
- You have the right to have incorrect information rectified.
- You have the right to have certain personal data deleted.
- You may have the right to restrict our processing of your personal data.
- You may have the right to object to our processing of your personal data based on reasons and circumstances that pertain to your particular situation.
- You have the right not to be subject to a decision based solely on automated means, without human interference unless the decision is necessary for your employment, the decision has a legal basis, or is based on your explicit consent.
- If the processing of your personal data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-

readable format (data portability).

- You can always lodge a complaint with a supervisory authority.

Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to for example data portability in the specific situation; it will depend on the circumstances of the processing.

In connection with inquiries concerning your rights, we ask that you provide us with adequate information to process your inquiry, including your full name and your email address, so that we may identify you and respond.

# 6. Changes to this Policy

We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the top 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.

# 7. Contact

You may contact us at the email address below if you:

- disagree with our processing or consider our processing of your personal data infringes on the law,
- have questions or comments to this Policy, or
- want to invoke one or more of your rights as a data subject described in this Policy.

hr@danbred.com

We strive to do everything we can to meet your wishes regarding our processing of your personal data and your rights as a data subject. Should you, despite our endeavors, wish to file a complaint, you can do so by contacting the national data protection agency.