



Let's go further



# Recruitment Privacy Policy



# 1. PURPOSE

The purpose of this policy is to inform about how EG process personal data during and after the recruitment process for new employees.

## 1.1. APPLICABILITY

The policy applies to anyone applying for a position in EG. Please see the list of legal entities in EG on <http://global.eg.dk/companies>

## 1.2. DEFINITIONS

In this policy "EG" shall also be referred to as "the company", "we", "us" and "our" and refers to the legal entity at which you are applying for a position.

Key terms and definitions can be found in the appendix, in section 5.1.

# 2. POLICY STATEMENT

EG will as data controller process your personal data in accordance with the GDPR and if applicable to your recruitment process also:

- the **Danish** Data Protection Act
- the **Norwegian** Data Protection Act
- the **Swedish** Data Protection Act (2018:218) and the Swedish Data Protection Ordinance (2018:219)
- the **Finnish** Act on the Protection of Privacy in Working Life (759/2004)
- the **Polish** Labour Code dated 26 June 1974
- the **Spanish** data protection and guarantee of digital rights (LOPDGDD)

If you have any questions about our processing of your personal data, please contact our Data Protection Office at [dpo@eg.dk](mailto:dpo@eg.dk).

## 2.1. THE PERSONAL DATA THAT YOU PROVIDE TO US

During the recruitment process, the personal data provided by you as included in your application, your CV or otherwise and in respect of participating in interviews as well as conducting a personality test and an intelligence test, will be registered in our recruitment systems.

The purposes of collecting personal data about you during the recruitment process is to evaluate your qualifications for the position and to ensure we can effectively communicate with you throughout the process.

The personal data that you provide to us during the recruitment process will – depending on the country in which you apply – typically include:

- name
- address
- date of birth
- gender
- telephone number
- email address
- educational background
- professional qualifications
- career history
- other relevant competences
- written references



The legal basis for processing personal data that you have provided during the recruitment process is article 6(1)(f) of the GDPR since we have a legitimate interest in being able to carry out the recruitment process and if applicable:

- section 221a of the Polish Labour Code dated 26 June 1974, and
- section 4 of the Finnish Act on the Protection of Privacy in Working Life (759/2004).

However, in relation to any **personal identification numbers** provided by you, the legal basis is article 6(1)(a) of the GDPR and depending on the establishment of the legal entity where you are applying for a position:

- section 11(2)(1) of the Danish Data Protection Act,
- section 12 of the Norwegian Data Protection Act,
- section 3(10) of the Swedish Data Protection Act, and
- section 29 of the Finnish Data Protection Act.

If you provide **sensitive personal data** to us during the recruitment process, the legal basis for our processing will be your consent, cf. article 9(2)(a) of the GDPR and if applicable:

- section 12(3) of the Danish Data Protection Act,
- section 5 of the Finnish Act on the Protection of Privacy in Working Life (759/2004), and
- section 221b(1) of the Polish Labour Code dated 26 June 1974.

Once we **agree on employment**, the legal basis for processing your personal data will be article 6(1)(b) as processing is necessary for entering into and the performance of your employment contract.

### 2.1.1. CRIMINAL RECORD CERTIFICATE

If you provide us with a copy of your criminal record certificate in connection with your employment, we register that we have seen your criminal record certificate, but not the content hereof. The purpose of a criminal record check is to ensure compliance with the requirements of customer agreements and to ensure security in the handling of and access to customer data and customer systems.

The legal basis for processing your personal data for the above purpose is article 6(1)(c) and 6(1)(f) of the GDPR to comply with legal obligations and our internal security policies and if applicable:

- section 8(3) of the Danish Data Protection Act.

### 2.1.2. RESIDENCE AND WORK PERMIT

Employees with other citizenships than Danish, Norwegian, Swedish, Finnish or Polish may need a valid residence and work permit to be able to work legally in Denmark, Norway, Sweden, Finland or Poland. Therefore, we obtain a copy of your passport and residence and work permit from you. We do this at the time of your employment as well as when your residence and work permit is up for renewal.

The legal basis for processing your personal data in regard to obtaining copies of your passport and your residence and work permit is article 6(1)(c) of the GDPR and if applicable:

- section 11(2)(1) of the Danish Data Protection Act, cf. section 59(5) of the Danish Aliens Act (in Danish: udlændingeloven),
- section 12 of the Norwegian Data Protection Act, cf. chapter 3 of the Norwegian Aliens Act (in Norwegian: utlendingeloven),
- section 5 of the Swedish Aliens Act (in Swedish: utlänningslagen),
- chapter 5 of the Finnish Aliens Act (in Finnish: Ulkomaalaislaki 301/2004), and

- chapter 16 of the Polish Act on Employment Promotion and Labour Market Institutions dated 20 April 2004 (in Polish: Ustawa z dnia 20 kwietnia 2004 r. o promocji zatrudnienia i instytucjach rynku pracy).

## 2.2. INFORMATION FROM SOCIAL MEDIA (NOT APPLICABLE TO POLISH EMPLOYMENT)

When recruiting for positions, we may carry out a search on social media such as LinkedIn and Facebook. The purpose of this is to assess whether your profile matches the company and the specific position.

The legal basis for collecting and subsequently processing personal data from social media is article 6(1)(f) of the GDPR since we have a legitimate interest in carrying out the abovementioned assessment.

In respect of any **sensitive personal data** made public by you on social media, the legal basis is article 9(2)(e) of the GDPR.

## 2.3. REFERENCES FROM PREVIOUS EMPLOYERS

If we obtain references from one or more of your previous employers, we may, with your permission, register whether the information you have given is confirmed or not. The purpose of this processing of the references is to ensure the legitimacy of the information you have provided to us.

The legal basis for processing your personal data for the above purpose is article 6(1)(f) of the GDPR since we have a legitimate interest in being able to have your professional skills confirmed by your previous employer(s).

## 2.4. STORAGE AND DELETION

If your application is rejected, we will store your personal data for a period of up to 12 months from the time of your application. If we wish to store your personal data with a view to future recruitment for a longer period than 12 months, we will ask for your consent to do so.

Your personal data contained in any personality test and an intelligence test conducted will be stored in accordance with the below:

1. If you are hired, the personal data will be stored during the employment period.
2. If you are not hired, the personal data will be stored only during the specific recruitment process (maximum 6 months).
3. If you are not hired, the personal data will be stored with a view to future recruitment if you consent to such (minimum 6 months).

## 2.5. OTHER RECIPIENTS WHO MAY PROCESS YOUR PERSONAL DATA

In connection with the recruitment process, other parties will receive your personal data. These parties include public authorities or providers of systems or administrative services, such as:

- Providers of personality profiling and intelligence tests.
- External recruitment partners.
- Public authorities.
- Our advisors.
- Other companies in the EG group.

We may transfer your personal data to recipients outside of the EU/EEA. The list of such recipients including the transfer basis can be provided upon request.

## 2.6. YOUR RIGHTS IN ACCORDANCE WITH THE GDPR

According to the GDPR, you have some rights in relation to our processing of your personal data.

### *RIGHT TO RECTIFICATION*

You have the right to have incorrect information about yourself corrected. You also have the right to have your information supplemented with additional information if this will make your personal data more complete and/or up-to-date.

### *RIGHT TO ERASURE*

In certain cases, you have the right to have information about you deleted before deletion would otherwise have occurred.

### *RIGHT TO RESTRICTION OF PROCESSING*

In certain cases, you have the right to have the processing of your personal data restricted. If you have the right to have the processing restricted, we may only process the information – for purposes other than storage – with your consent, or for the purpose of establishing, exercising, or defending legal claims, or to protect a person or important public interests.

### *RIGHT TO OBJECTION*

In certain cases, you have the right to object to our otherwise lawful processing of your personal data.

### *RIGHT TO DATA PORTABILITY*

In certain cases, you have the right to receive your personal data in a structured, commonly used, and machine-readable format, as well as to have these personal data transferred from one data controller to another without hindrance.

### *RIGHT WITHDRAW YOUR CONSENT*

You have the right at any time to withdraw a consent to the processing of your personal data. However, you should be aware that if you withdraw your consent, this will only take effect from the time of the withdrawal. Therefore, it does not affect the legality of our processing of the information until the time you withdraw your consent.

You can read more about your rights on the national data protection authorities' websites. If you want to apply one or more of your rights, please contact our Data Protection Office at [dpo@eg.dk](mailto:dpo@eg.dk).

### *YOUR RIGHT TO LODGE A COMPLAINT*

You have the right to lodge a complaint about our processing of your personal data with the national data protection authority. Please find the contact details for your national data protection authority here:

- The Danish Data Protection Agency - [www.datatilsynet.dk](http://www.datatilsynet.dk)
- The Norwegian Data Protection Authority - [www.datatilsynet.no](http://www.datatilsynet.no)
- The Swedish Data Protection Authority - [www.datainspektionen.se](http://www.datainspektionen.se)
- The Finnish Data Protection Authority - [www.tietosuojaja.fi](http://www.tietosuojaja.fi)
- The Polish Data Protection Authority - [www.uodo.gov.pl](http://www.uodo.gov.pl)
- The Spanish Data Protection Authority - [delegadoprotecciondatos@sanidad.gob.es](mailto:delegadoprotecciondatos@sanidad.gob.es)

## 3. POLICY REVIEW AND UPDATE

### 3.1. POLICY REVIEW

This policy is to be reviewed on an annual basis. The review will be conducted by Group Legal & Compliance and presented to the General Counsel, Vice President for approval.

### 3.2. POLICY UPDATE

Major changes to this policy are to be approved by the General Counsel, Vice President. Minor changes are to be approved by Group Legal & Compliance.

### 3.3. REVISION HISTORY

VERSION	DATE FOR CHANGE	AUTHOR	APPROVED BY	SUMMARY OF CHANGE
1.0	29.04.2020	JHANS	SOWOL	Policy created
1.1	20.04.2022	JHANS	SALBE	Minor changes to policy
1.2	08.10.2024	PERAN	SALBE	New template for policy and revision of wording

## 4. DOCUMENT MANAGEMENT

DOCUMENT MANAGEMENT	
Version	1.2
Published	08.10.2024
Author	JHANS
Policy Owner	Group Legal & Compliance
Approval date	08.10.2024
Last Review – date	08.10.2024
Next Review – date	01.10.2025

## 5. APPENDIX

### 5.1. DEFINITIONS

TERMINOLOGY	DEFINITION
Personal Data	Personal data is any information that relates to an identified or identifiable living individual. Different pieces of information, which collected together

	<p>can lead to the identification of a particular person, also constitute personal data (Definition from European Commission).</p> <p>Defined further in article 4(1) of the GDPR:</p> <p>Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;</p>
<p>Processing of personal data</p>	<p>Processing covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data (Definition from European Commission)</p> <p>The General Data Protection Regulation (GDPR) applies to the processing of personal data wholly or partly by automated means as well as to non-automated processing, if it is part of a structured filing system.</p>
<p>National Data Protection Authorities</p>	<p>National Data Protection Authorities (DPAs) are independent public authorities that supervise, through investigative and corrective powers, the application of the data protection law. They provide expert advice on data protection issues and handle complaints lodged against violations of the General Data Protection Regulation and the relevant national laws. There is one in each EU Member State.</p> <p>The DPA is the main contact point for questions on data protection in the EU Member State where your company/organization is based. EG is part of a group of companies established in different EU Member States why the relevant DPA may be in either Denmark, Norway, Sweden, Spain, Finland or Poland.</p>