

Privacy policy for Nettbil recruitment processes

Introduction

Nettbil is the data controller of your personal data and places great importance on processing applicant personal data in a lawful, correct, and transparent manner. This policy explains how we collect and use personal data for recruitment, how we protect applicants' privacy, and what rights you have under applicable data protection laws, including the GDPR. It applies exclusively to recruitment activities, not to data processing once an employment relationship is established.

Should you have any questions about the processing of your personal data for recruitment, please contact nina.longva@nettbil.no.

The purposes for which we process your personal data

We collect and process personal data for recruitment purposes, which includes:

- **Job listings and application collection**

We publish job openings on our own sites or via third-party recruitment portals such as Jobylon and LinkedIn and then collect and review applications.

- **Candidate evaluation**

We assess candidates through the documents submitted, interviews, case studies, personality and skill tests, and (where legally permitted) background checks and reference checks to determine suitability.

- **Recruitment communication**

We communicate with applicants regarding interview schedules, application status and other updates relevant to the hiring process.

- **Statistical purposes and analytics**

We may create aggregated, non-identifiable reports (e.g., demographic analyses) to improve our recruitment processes.

- **Future opportunities (with consent)**

We may ask unsuccessful candidates for permission to retain their application materials for future roles within Nettbil. If you do not wish to be considered for other positions, you may decline.

- **Onboarding**

When hired, we may share information and access to relevant IT-systems prior to your start date for onboarding purposes.

To achieve and fulfil some of the purposes listed above, we use machine learning and train models to make predictions or decisions using historical data. Some of these models can be classified as artificial intelligence technology (“AI”). AI models are designed to be able to make decisions based on similarity to examples rather than explicit instruction. AI employs machine learning algorithms and deep learning networks to simulate a variety of cognitive skills. Within Nettbil, AI can be used for various purposes, including recruitment, to deliver and improve our processes.

The categories of personal data we process about you for recruitment purposes

We have information about you that you have provided yourself, information that originates from your activities as an applicant and information collected from other sources. The categories of personal data that we typically process about applicants and the source(s) of such data are set out in the table below.

| Category of personal data | Description of the types of personal data processed | Source(s) from which we collect your personal data |
|---|--|---|
| Working profile data | Name, age, contact details (phone/email), location and other information provided in your application. | Collected directly from you (e.g. CV, application form) or from publicly available sources (e.g. LinkedIn). |
| Applicant generated content - recruitment | CV, cover letter, statements of reference, skill/personality test results, interview notes and background-check data (where applicable and lawful). | Provided by you or obtained from third parties (e.g. references, test providers). |
| Employer generated content - recruitment | Content prepared based on applicant generated content (such as recruitment/internal assessments), meeting recordings, AI transcriptions or meeting summaries, information from background checks, information from publicly available sources and employment agreements. | Directly from the applicant, from relevant IT-systems such as Google Workspace, from public sources or from third parties that conduct background checks on our behalf. Nettbil prepares employment agreements for new hires. |
| Financial and salary related information | Salary requirements, salary history, compensation and benefits related data (including social security benefits), insurance and pension. | Directly from the applicant and relevant public authorities (such as tax offices and public social security authorities). |
| Communication and | Email exchanges, interview notes or any additional | Directly from the applicant. |

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| correspondence | information you voluntarily provide, including demographic data collected for statistical purposes. | |
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Note: Any data that is not directly relevant to recruitment (e.g. certain demographic data) is voluntary and will not be used to influence hiring decisions.

The legal bases we rely on for processing your personal data

Below you will find an overview of the categories of personal data that we typically process in relation to each of the purposes for which we collect your personal data, as well as the legal bases we rely on for processing your personal data for such purposes. We will only process personal data about you that is necessary for the respective purposes.

Special categories of personal data, e.g. information concerning health data and trade union membership, are only processed to the extent necessary to fulfil our obligations and rights in the area of employment law.

| Purpose of processing activity | Legal basis | The categories of personal data we typically process |
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| Job listings and application collection | Our legal basis for processing personal data for this purpose is that it is necessary in order to take steps at the applicants' request prior to entering into an employment | Working profile data, Applicant generated content, Employer generated content and Communication and correspondence. |

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| | agreement, as well as our legitimate interest in hiring new employees and finding qualified job candidates, cf. GDPR art. 6(1)(b) and GDPR art. 6(1)(f). | |
| Candidate evaluation | Our legal basis for processing personal data for this purpose is that it is necessary in order to take steps at the applicants' request prior to entering into an employment agreement, as well as our legitimate interest in hiring new employees and finding qualified job candidates, cf. GDPR art. 6(1)(b) and GDPR art. 6(1)(f). | Working profile data, Applicant generated content, Employer generated content, Financial and salary related information and Communication and correspondence. |
| Recruitment communication | Our legal basis for processing personal data for this purpose is that it is necessary in order to take steps at the applicants' request prior to entering into an employment agreement, as well as our legitimate interest in hiring new employees and finding qualified job candidates, cf. GDPR art. 6(1)(b) and GDPR art. 6(1)(f). | Working profile data, Applicant generated content, Employer generated content, Financial and salary related information and Communication and correspondence. |
| Statistical purposes and analytics | Our legal basis for processing personal data for this purpose is our legitimate interest in performing analytical and insight assessments (e.g. non-discrimination and | Heavily deidentified Working profile data, Applicant generated content, Employer generated content and Financial and salary related information. |

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| | equal opportunities analysis), cf. GDPR art. 6(1)(f). | |
| Future opportunities | Our legal basis for storing your personal data for this purpose is consent, cf. GDPR art. 6(1)(a). You can withdraw consent at any time. | Working profile data. |
| Onboarding | Our legal basis for processing personal data for this purpose is that it is necessary in order to perform our employment agreement with you, as well as our legitimate interest in onboarding new employees, cf. GDPR art. 6(1)(b) and GDPR art. 6(1)(f). | Working profile data, Employer generated content and Financial and salary related information. |

How long we store your personal data

We will retain your personal data for as long as necessary for the purposes for which we collect them. The precise retention period will depend on the purpose for which we hold your information, any applicable local law requirements and subsequent purposes that are not incompatible with the original purpose, such as retention for defending possible claims.

Our guidelines below, includes our assessments of how long it will typically be necessary to keep the various categories of personal data. Please note that such assessments are not absolute, but based on our experience for a normal situation. It is important to emphasise that special situations may lead to longer or shorter retention periods than the ones described below. We will in any case retain information as long as required subject to local law and in case special needs arise, e.g. by complaints or claims made against us or by us.

| Category of Personal Data | Description | Retention period/deletion |
|---|---|---|
| Working profile data | Name, age, contact details (phone/email), location and other information provided in your application. | <p>For successful applicants, <i>Working profile data</i> will normally be retained throughout the employment period and for a certain period thereafter, including for the purpose of documenting the employment.</p> <p>For non successful applicants, the Working profile data is kept for 24 months.</p> |
| Applicant generated content - recruitment | CV, cover letter, statements of reference, skill/personality test results, interview notes and background-check data (where applicable and lawful). | <p>For successful applicants, <i>Applicant generated content</i> will normally be retained throughout the employment period and for a certain period thereafter, including for the purpose of keeping documentation for possible legal claims.</p> <p><i>Results from personality and skill tests</i> will normally be deleted after the trial period/extended trial period.</p> <p>For non successful applicants, Applicant generated content is kept for 24 months.</p> |

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| Employer generated content - recruitment | <p>Content prepared based on applicant generated content (such as recruitment/internal assessments), meeting recordings, AI transcriptions or meeting summaries, information from background checks, information from publicly available sources and employment agreements.</p> | <p>For successful applicants, Internal assessments etc. related to recruitment will normally be deleted after the trial period/extended trial period.</p> <p>Information from background checks are deleted in accordance with applicable local law, if any, and otherwise normally deleted after the trial period/extended trial period.</p> <p>Employment agreements will normally be retained throughout the employment period, and for a certain period thereafter, including for accounting purposes and for keeping documentation for possible legal claims.</p> <p>Meeting recordings, AI transcriptions or meeting summaries are deleted within 30 days unless there are compelling reasons to retain them for a longer period of time.</p> <p>For non successful applicants, Employer generated content is kept for 24 months.</p> <p>Information from background checks are deleted in accordance with applicable local law.</p> <p>Meeting recordings, AI transcriptions or meeting summaries</p> |
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| | | are deleted within 30 days unless there are compelling reasons to retain them for a longer period of time. |
| Financial and salary related information | Salary requirements, salary history, compensation and benefits related data (including social security benefits), insurance and pension. | <p>For successful applicants, <i>Financial and salary related information</i> will normally be retained throughout the employment period, and for a certain period thereafter, including for accounting purposes and for keeping documentation for possible legal claims.</p> <p>For non successful applicants, where Financial and salary related information has been provided, it will normally be deleted after the recruitment process is completed but may be kept in Jobylon for a maximum of 24 months.</p> |
| Communication and correspondence | Email exchanges, interview notes or any additional information you voluntarily provide, including demographic data collected for statistical purposes. | <p>For successful applicants, Communication and correspondence will normally be retained throughout the employment and then deleted in accordance with Nettbil's internal retention policies.</p> <p>For non successful applicants, Communication and correspondence will normally be deleted after the recruitment process is completed. Emails will be deleted upon request from the applicant or in accordance with Nettbil's internal retention policies.</p> |

How we share your personal data

We may sometimes share your personal data with other parties, including:

- Internal Nettbil Stakeholders – Such as HR personnel, hiring managers, and relevant team members involved in the specific recruitment process.
- Third-Party Service Providers – We may use recruitment agencies, applicant tracking system providers (e.g., Jobylon), providers of personality tests and other specialists who act on our behalf. They are bound by contractual agreements to process your data only for our recruitment purposes.
- Other data controllers, including companies and public authorities who process the personal data for their own purposes and have full responsibility towards the applicant for their use of the applicants' personal data for such purposes (such as government agencies). We will only share your personal data with such third parties where we have a legal basis to do so, including where this is required for compliance with a legal obligation to which we are subject.

Transfer of data outside of the EU/EEA

We may transfer your personal data outside of the EU/EEA in certain situations, as some of our data processors are located there. However, we will only do this in situations where:

- the data is transferred to a third country that is subject to an adequacy decision issued by the European Commission; or
- the transfer is subject to EU's Standard Contractual Clauses (SCCs) or other appropriate safeguards.

We will conduct documented assessments of the lawfulness of the transfer and implement supplementary measures where required to ensure legal transfers of your personal data pursuant to the GDPR and applicable guidelines. We will provide you with further details about such international data transfers upon your request, including a copy of the safeguards, if applicable. Please use the contact information below.

Information security

We take appropriate technical and organizational measures to ensure a level of security appropriate to the risk, as required by Article 32 of the GDPR. These measures are designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data. Such measures include, the use of encryption and pseudonymisation, access management controls, regular testing and scanning for security threats, assessments and evaluation of implemented safeguards as well as efficient incident handling.

Your rights as a data subject

As a data subject, you have several rights in relation to our use of your personal data. These include the following rights:

Information: You are entitled to receive further information about how we process your personal data. This privacy policy is part of such information.

Access: You are entitled to get access to the personal data that we process about you in various registries, IT systems and archives. Please contact the talent acquisition specialist who handled your application. The data is normally collected and sent to you within 30 days after we have received a correct access request.

Rectification: You are entitled to have your personal data corrected and to have incomplete personal data about you completed. If you believe that any information about you in a register is incorrect or misleading, you should contact the talent acquisition specialist who handled your application.

Erasure: You are entitled to request erasure of the personal data we have about you in certain situations, such as when the personal data is no longer necessary for the purpose for which it was originally collected or received.

Restriction: You are entitled to request that the processing of your personal data is restricted in certain situations, such as when the personal data is no longer necessary for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims.

Objection: In some cases, you have the right to object to our processing of your personal data. You also have the right to object to being subject to a decision based solely on automated processing.

Data portability: Where your personal data is processed based on your consent or for the fulfilment of a contract, you have the right to request that we transfer your data to another controller (data portability).

If the processing is based on your consent, you have the right to withdraw your consent at any time. This will not affect the legality of any processing activities based on the consent before your withdrawal.

Please note that the rights mentioned above are subject to conditions and limitations by law. Please contact us if you would like to exercise your rights or if you would like more information about the conditions/limitations that may apply.

If you find that we process your personal data unlawfully, you may file a complaint to the competent supervisory authority. We encourage you to contact us prior to making such a complaint, so that we may consider your objection and clarify potential misunderstandings.

[Norway: Datatilsynet](#)

Changes to this privacy policy

We may change this privacy policy from time to time when deemed necessary.

Contact information

For questions or comments about how Nettbil processes your personal data, or if you would like to exercise your privacy rights, please contact the talent acquisition specialist who handled your application. We will respond to your inquiry as soon as possible and within one month at the latest.

You can also find more information on the relevant supervisory authorities' websites.