

Guidelines in Zmarta Group for management of personal data in connection with recruitment of staff

These guidelines describe how the companies within the Zmarta Group process personal data and other information that job seekers provide in connection with the declaration of interest for advertised services within the Zmarta Group. The rights of the applicant are also stated in the guidelines.

Controllers of data – companies in Zmarta Group

- Centum Finans AS (Norway)
- Elskling AB (Sweden)
- Freedom Finance Kreditservice AB (Sweden)
- Freedom Rahoitus Oy (Finland)
- Insplanet Försäkringsförmedling AB (Sweden)

The companies above will forthwith be referred to as “Zmarta”, “us”, “we” or “ours”.

Processed data

Zmarta collects and processes personal data that the job seeker themselves provides to us in connection with the registration of a job application for an advertised position with us.

Examples of data we process within the application and recruitment process are:

- Information provided in connection with a job application and in a recruitment process is; curriculum vitae, grades and other certificates from previous employers as well as any contact details for reference persons.
- Basic information provided; name, date of birth or social security number.
- Contact information; address, email address and telephone number.
- information on skills and competences; such as completed training or experiences of various assignments and possible test results from, for example, personality tests.
- Photographs such as a portrait picture and/or video

How data is collected

Zmarta collects data that the applicant themselves have submitted to us when choosing to apply for a position with Zmarta through our recruitment system Jobylon.

Zmarta also process assessment results for those candidates who are invited to take this assessment through our assessment system Alva Labs.

How is the data used?

We use the personal data of the applicant for "**Administration of participation in our recruitment process**"

Purpose

As an employer, Zmarta manages personal data of the applicant to the extent it is required for safe identification in order to fulfil our assignment to recruit staff in to Zmarta Group.

Data that is processed

The personal data Zmarta may process for these purposes are, for example, in addition to name, social security number and contact information, information on current and past employment, position / title, and information that is usually specified in the job application. If the applicant proceeds in the recruitment process and receives an offer of work, information on previous salary, full social security number, insurance solutions and the like may also be registered in order to be able to draw up an offer for work and / or an employment contract..

Legal basis: Completion of the recruitment process and potentially an employment agreement.

The personal data Zmarta may process for these purposes. The processing of personal data described above is a prerequisite for us to fulfill our contractual obligation and provide applicants with employment.

If the recruitment process results in an employment offer and we cannot or may not perform these treatments, we cannot offer nor can we administer an employment.

How long is data saved

Zmarta does not store personal data beyond what is needed depending on the purpose. The information that is processed and that which is generated within the employment or consulting assignment is processed for different purposes. The data is saved for different lengths of time depending on what they are to be used for and depending on our legal obligations according to law.

- Any test results from assessments conducted in our assessment tool Alva Labs (e.g. during a recruitment process) are saved for a maximum of two (2) years after the completion of the assessment.
A candidate in a Zmarta Group recruitment process can remove his/her test result themselves in the assessment tool Alva Labs at any time during and after the recruitment process.
- An application via our recruitment system Jobylon is saved for a maximum of two (2) years or less in agreement with the applicant. A person applying for a job in Zmarta Group via Jobylon can delete their application and all their information at any time, and Zmarta Group will then no longer have any access to the information at all.

Disclosure of data

In certain circumstances, we may share information about you with other personal data controllers, which we describe in more detail below.

Other entities within Zmarta Group – Since Zmarta Group and its companies share certain functions, personal data may be shared with other companies within the company group.

Data Protection

Zmarta takes appropriate technical and organizational security measures, consistent with industry standards, to ensure that all information we process is protected from unauthorized access. Only a limited proportion of employees (such as the HR department and relevant managers) have access to the information about the applicant. Authorization and handling of the information is strictly regulated.

Rights of the data subject

Below we list the rights the application/subject of the data are covered by according to the data protection law.

The right to access and deletion

Jobseekers to Zmarta have access to their application and the personal information provided in the recruitment tool "Jobylon". The applicant can delete his / her information / documents at any time. The same applies to the tests carried out in Zmarta's tool "Alva Labs".

The Right to Limitation of treatment

An applicant has the right in certain cases to request that the processing of his/her personal data by Zmarta be restricted. Restriction means that personal data will be marked so that in the future they may only be processed for certain limited purposes.

The right to restriction applies, among other, to, for example, applicants with a protected identity.

The Right to Object

The applicant has the right to object to the processing of personal data that Zmarta does based on a so-called balancing of interests. In such a case, the applicant needs to specify which treatment they are objecting to. In the event of such an objection, we may only continue to process the data if we can show that there are justifiable reasons that outweigh the processing of personal data than the applicant's interests.

Complaints

If you believe that we process your personal data in violation of applicable data protection regulations, you should report this to Zmarta Group Data Protection Officer as soon as possible. See contact information below.

Contact information & Regulatory authority

Zmarta Groups Data Protection Officer: Per-Eric Henningsson

Email: dpo@zmartagroup.com or phone: +46 73 707 47 06.

Address: Data Protection Officer, Zmarta, Box 1068, 262 21 Ängelholm.

For candidates in Finland, we refer to acting Data Protection Officer, Legal Counsel Reeta Lajunen:

Email: dpo.fi@zmartagroup.com or phone: +358 40 719 41 00.

The Data Protection Authority

The Data Protection Authority (DPA) is a public authority and is to protect the individual's privacy in the information society. The DPA works to prevent encroachment upon privacy through information and by issuing directives and codes of statutes. The DPA also handles complaints and carries out inspections.

According to the Data Protection Law the candidate (as referred to in this document) has the right to submit complaints related to the processing of his/her data by Zmarta to the Data Protection Authority by email at: datainspektionen@datainspektionen.se.

More information about data protection, current legislation and other related information is available on the DPA website www.datainspektionen.se. (in English at: <https://www.datainspektionen.se/other-lang/in-english/>)

These guidelines are decided by the Zmarta Group CHRO and DPO.