

Privacy Notice to Candidates

NOVO Energy

September 2022

1 General information

The purpose of this privacy notice is to provide information on how NOVO Energy AB including its affiliates NOVO Energy Production AB and NOVO Energy R&D AB (“NOVO” or “we”), as a potential employer, process Personal Data of you as a candidate (“Personal Data” is defined below in section 2) in our recruitment process and thereafter.

We respect your privacy and duly protect and safeguard the Personal Data we process about you. All processing of Personal Data is made in accordance with applicable data protection legislation, including but not limited to the GDPR, meaning that your Personal Data is:

- Processed lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have explained to you and not processed in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about;
- Accurate and kept up to date;
- Maintained only for as long as necessary for the purposes we have told you about; and
- Kept securely and protected against unauthorised or unlawful processing and against loss or destruction using appropriate technical and organisational measures.

The below describes in more detail how we collect, process and store your Personal Data. Don't hesitate to contact us if you have any thoughts or questions.

2 What Personal Data will be processed?

NOVO may collect and process the following Personal Data about you (as relevant from case to case): name, address, contact information, nationality, information in your CV and letters that you send us as well as the information that is provided to us in interviews, tests or background checks (i.e. to verify the information you provide to us) as part of the recruitment process (together your “**Personal Data**”). The Personal Data is collected from you directly, from your referees (e.g., previous employer or colleagues providing references), from publicly accessible sources and from our partners.

3 What is the purpose of processing your Personal Data?

We will process your Personal Data for the following purposes:

1. Communicate with you about the recruitment process;
2. assess your skills, qualifications, and suitability for the role;
3. carry out background and reference checks, where applicable;
4. invite you to the company and your team, where applicable;
5. create aggregated statistical and demographic analyses;
6. keep records for existing and future hiring processes;
7. comply with legal or regulatory requirements; and
8. establishment, exercise or defence of legal claims.

If any purpose involves automated decision-making including profiling, information about the logic involved as well as the significance and the envisaged consequences of such processing will be provided to you.

If you do not provide certain Personal Data to us, we may not be able to properly assess you as a candidate in the recruitment process.

4 What is the legal basis for processing your Personal Data?

The processing of your Personal Data is necessary for the legitimate interest pursued by NOVO. It is, for example, in our legitimate interests to assess and decide whether to offer you to a position at NOVO, since it is beneficial for us to appoint a suitable candidate to the position.

We have carried out a balance-of-interest test where we have assessed and concluded that our legitimate interest in processing your Personal Data for the purposes described in Section 3 above outweigh the privacy intrusion that you as candidate may be exposed to, taking into specific consideration that (i) the processing activities can be reasonably expected by you as candidate in a recruitment process, that (ii) the processing of Personal Data is limited, and that (iii) you provide us with most of the Personal Data.

Where applicable, we also need to process your Personal Data in order to enter into an employment contract with you, and to take the necessary steps prior to entering into such contract.

5 Who has access to your Personal Data?

We have implemented appropriate technical and organisational measures to protect your Personal Data against loss or unlawful access etc. The number of persons with access to your Personal Data is limited. Only individuals which need to process your Personal Data in accordance with the purposes above will have access to your Personal Data.

We may share your Personal Data with partners that carry out services on our behalf, e.g. Jobylon, and other recruitment companies, service providers and advisors engaged from time to time.

Where applicable (typically a candidate residing in a country outside the EU/EEA), your Personal Data may be transferred to a country outside of EU/EEA which may offer a lower level of protection than within the EU/EEA. The transfer is needed to perform the recruitment process with you as a candidate. When transferring Personal Data to countries outside the EU/EEA, NOVO uses standard contractual clauses approved by the European Commission which ensure a sufficient level of protection for your Personal Data.¹

6 For how long is your Personal Data stored?

Your Personal Data will be stored only for as long as it is necessary for the purposes listed in Section 3 above, for which the Personal Data are processed, and as long as may be required under local law. This means, for example, that your Personal Data will be stored during the course of your recruitment process and, where applicable, for as long as you remain a candidate of interest in relation to other positions and roles within NOVO. Nonetheless, some Personal Data will always be stored for no less than two years after a completed recruitment process for the sole purpose of establishment, exercise or defence of legal claims.

Please note that Personal Data may be stored and used for recruitment to other positions within NOVO than the position you applied to. If you are not interested in any other positions, please contact NOVO and let us know you wish to be excluded and deleted (for such purpose).

The recruitment service, in which you apply to a position and upload your Personal Data, may offer you to delete your Personal Data. Please note that such deletion may result in us not being able to fulfil or complete the recruitment process and/or offer you a position at NOVO.

¹ The EU standard contractual clauses can be found via the following URL: https://ec.europa.eu/info/law/law-topic/data-protection/publications/standard-contractual-clauses-controllers-and-processors_en/.

7 What are your rights?

NOVO AB, reg. no. 559344-2600, at Lindholmospiren 9, 417 56 Gothenburg, Sweden, is the controller of the processing of your Personal Data. This means that we are responsible for your Personal Data being processed correctly and in accordance with applicable laws.

You are entitled to know what Personal Data we are processing regarding you, and you can request a copy of such data. You are entitled to have incorrect Personal Data regarding you corrected, and in some cases you may request that we delete your Personal Data (if, for example, the Personal Data is no longer necessary for the purpose for which it was collected or if you withdraw a consent). You also have the right to object to certain processing of your Personal Data, and request that the processing of your Personal Data be limited. Please note that limitation or deletion of your Personal Data may result in us not being able to fulfil or complete the recruitment process or offer you a position at NOVO.

If you have questions regarding how we process Personal Data concerning you, you are most welcome to contact us at legal@novoenergy.se.

If you have any objections or complaints with the way we process your Personal Data, you have the right to lodge a complaint with the Swedish Data Protection Authority (Sw. *Integritetsskyddsmyndigheten*) at <https://www.imy.se/>.