

# Recruitment Privacy Policy

Group Policy

<b>Document Name</b>	Recruitment Privacy Policy - Group	<b>Version</b>	1.0
<b>Document Owner</b>	Group HR	<b>Approved by</b>	Head of Group Compliance
<b>Classification</b>	External Group Policy	<b>Approval date</b>	11 February 2024
<b>Countries in scope</b>	All		

## 1. Introduction

- 1.1. This Recruitment Privacy Policy (the “**Policy**”) describes how GlobalConnect Group (“**us**”, “**we**” or “**our**”) as controller collects and processes your personal data when you apply for a position in a company within the GlobalConnect Group.
- 1.2. The Policy is made available to you in order for us to comply with the General Data Protection Regulation (2016/679 of 27 April 2016) (“**GDPR**”) and its requirements about information to be provided when personal data is collected.

## 2. Personal data we collect about you

- 2.1. We only process your personal data when relevant and according to applicable law.
- 2.2. Depending on the specific circumstances and the position you are applying for we may process the following personal data:
  - Your application and C.V.
  - Your full name (first name (s), middle name (s), last name (s))
  - National identification number
  - Address
  - E-mail
  - Phone number
  - Birth date
  - Gender
  - Citizenship
  - Language skills/preferences
  - Educational information
  - Results of personality tests and cognitive tests taken in connection with the recruitment
  - Professional core competencies
  - Leisure and personal interests
  - Information collected from your personal profile (e.g., personal characteristics)
  - Information from publicly available sources, including the Internet and social media
  - Information from previous employers (e.g., references and recommendations)
3. We collect and process the personal data that we receive directly from you or that you submit through our website, the recruitment agencies we work with, or via e-mail, mail

and/or by telephone and during interviews. We also collect personal data from references provided by you. If we collect your personal data from other sources, we will inform you.

4. We may process your criminal records and/or your credit information in connection with the recruitment process. The purpose is to assess if the criminal record and/or credit information is compatible with the requirements for the specific position you applied for e.g., senior executive in a key position. The processing will in such a case be based on your explicit consent.
5. In cases where we have an employment law obligation to provide a candidate with a suitable working environment or the future provision of employment benefits, we may also collect special categories of personal data from candidates. For example, we may need to collect information about a candidate's disabilities to provide a suitable working environment for that candidate if successful in the application.
6. If we need to collect and process other personal data about you than stated above, we will let you know about such collection and processing.

### 3. Purpose of processing your personal data

- 3.1. We collect and process your personal data to enable us to assess you and your competencies in relation to the position you applied for in GlobalConnect.

### 4. Legal basis for the processing of personal data

- 4.1. We only process your personal data when we have a legal basis for the processing in accordance with GDPR and national law as follows:
  - a) Consent, GDPR Article 6(1)(a) - based on your consent we process certain personal data in connection with the recruitment process. This may include criminal records and/or your credit information in connection with the recruitment process for specific positions.
  - b) Applicable law, GDPR Article 6(1)(c) – the processing is necessary to comply with applicable law and or labor law obligations or collective agreements.
  - c) Legitimate interest, GDPR Article 6(1)(f) – the processing is necessary to pursue our legitimate interest. We store personal data for 12 months after the completion of the recruitment process with GDPR Article 6(1)(f) as the legal basis so that if the need arises, we can assess you for another position. We may also have a legitimate interest in contacting references chosen by you for statements, references and recommendations related to your previous career and work experiences.
  - d) Sensitive personal data (i.e., the "special categories", GDPR, Article 9(1) – the processing only takes place if relevant and necessary and permitted by GDPR, Article 9(2) to (4) including in the following cases.
    - After obtaining your explicit consent in accordance with the GDPR, Article 9(2)(a). You can always withdraw your consent by contacting us via the contact information provided in section 8 of this Policy. If you withdraw your

consent, the personal data processed based on the consent will be deleted unless they can or must be processed, for example, to comply with a legal obligation. Withdrawal of your consent does not affect the legality of the processing that took place prior to the withdrawal of the consent.

- When the processing is necessary to comply with a work, health, or social law obligation where such obligations derive from national law or collective obligations which provide appropriate safeguards for the data subject's fundamental rights and interests, cf. GDPR, Article 9(2)(b).
- e) Necessary for a potential or established contractual relationship, GDPR Article 6(1)(b) – It is important for us and for our potential future employees that we can make the right choices when filling vacancies. This requires that before any employment, we can make a systematic assessment and administration of applications, which i.e., involves the registration and processing of personal data about you. Some of the personal data received under the sections above may be relevant in an employment situation and will therefore be included in an employment contract and our personnel archive if your application is successful.

## 5. Recipients of your personal data

5.1. GlobalConnect only shares your personal data when permitted or required by law. GlobalConnect may, depending on the circumstances, share your personal information with:

- a) Our external and professional suppliers and partners, such as recruitment services, system providers, screening service providers, providers of personality testing systems, and/or financial or legal advisors under confidentiality obligations. The suppliers and/or partners will not process your personal data, unless permitted by law. If the suppliers and/or partners perform processing tasks on behalf of GlobalConnect it will always be under a data processing agreement. If the external party is an independent controller, then their processing of your personal data will be conducted under their privacy policy which they will inform you about unless the law requires otherwise.
- b) Other companies within the GlobalConnect Group, if we deem it necessary for our legitimate interests such as for purposes in connection with our internal administration, the company's strategy as well as audits, follow-ups, and development.
- c) We will also disclose your personal information to third parties if it is necessary for our legitimate interests in connection with the operation and development of our business.
- d) Competent law enforcement, regulator, government authority, court or third parties: (i) as may be permitted or required by applicable law or regulation; (ii) to exercise, establish or defend our legal rights; or (iii) to protect your vital interests or those of any other person.
- e) A potential buyer (and its agents and advisers) in connection with any proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer that it must use your personal information only for the purposes disclosed in this Policy; and
- f) A person or an organization you have provided your consent to disclose to.

5.2. As a general rule, we will not transfer personal data to countries outside the EU / EEA. In exceptional cases, the transfer will take place on the following basis:

- a) The country to which personal data is transferred has been assessed by the European Commission to ensure an adequate level of protection of personal data, or
- b) If the country has not been assessed by the European Commission to ensure an adequate level of protection of personal data, GlobalConnect will ensure the necessary guarantees for the transfer of personal data to third countries using the standard contractual clauses of the European Commission and, if necessary, using additional measures.

5.3. All parties with whom we share your personal data may only use such data for the specific purposes we have specified. We will always ensure that parties who are allowed to access your personal data are covered by privacy and security measures that comply with this Policy and applicable laws.

5.4. To protect the privacy of your personal data, we maintain both technical and organizational safeguards, and we update and test our security regularly. However, no information system can be completely secure. Hence, we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the Internet and wireless networks.

## 6. Deletion and retention of your personal data

6.1. Your personal data is stored for as long as is necessary in relation to the purposes described above. As a general rule, personal data obtained in connection with the recruitment process is stored as follows:

- a) If you are not successful with your application, your CV and other documentation directly related to the application are retained for a period of up to 12 months counting from notification of rejection for the position.
- b) In case your application requires a background check, we may record information about any relevant criminal records. Information about the existence of relevant criminal records will be destroyed after a maximum of two weeks after receipt of the information. Please note that no storage of the criminal record itself will take place.
- c) If your application is successful, your personal data in connection with the application will be transferred to our personnel management system and will be retained according to GlobalConnect's Personal Data Retention and Deletion Group Policy.

## 7. Your rights

7.1. As a data subject, you have the following rights:

- a) You have the right to request access, correction, or deletion of your personal information.



- b) You have the right to object to the processing of your personal data if the processing is based on article 6 GDPR paragraph 1 letter f (legitimate interests) or on automatic processing, including profiling, cf. article 21 and 22 GDPR. If you object, we may no longer process the personal data in question, unless we can demonstrate compelling legitimate grounds for the processing that take precedence over your interests, or if the processing is necessary for the establishment, exercise or defense of legal claims. However, this right to object does not apply if the processing is necessary for entering into or fulfilling a contract between you and GlobalConnect, if the processing is authorized by law, or if the processing is based on your consent.
- c) If the processing of your personal data is based on your consent, you have the right to revoke your consent at any time. If you revoke your consent, it will not affect the legality of the processing carried out before your revocation of your consent.
- d) You have the right to receive the personal information that you have provided in a structured, commonly used and machine-readable format (data portability)
- e) If you are dissatisfied with our processing of your personal data and we cannot resolve the issue, you can file a complaint with the supervisory authority in your country:
  - Denmark: Datatilsynet (Danish Data Protection Agency)
  - Norway: Datatilsynet (Norwegian Data Protection Authority)
  - Sweden: Integritetsskyddsmyndigheten (Swedish Authority for Privacy Protection)
  - Finland: Tietosuojavaltuutetun toimisto (Office of the Data Protection Ombudsman)
  - Germany: Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (Federal Data Protection Authority)

- 7.2. Please note that there may be certain conditions or limitations to some of your rights regarding our handling of your personal data. This means that you may not always be entitled to data portability, for example, depending on the specific circumstances of the processing of your personal data.
- 7.3. If you have questions or want to exercise your rights, you can contact us - see section 8 below.

## 8. Controller and contact details

- 8.1. The legal entity – the controller - responsible for the processing of your personal data is the local GlobalConnect company managing your recruitment process. You may always contact your local GlobalConnect company if you have any questions or concerns about how we handle your personal data for recruitment purposes.
- 8.2. In some cases, the administrative and HR systems used are provided by the Danish subsidiary GlobalConnect A/S as a service to the other companies in the GlobalConnect Group. In such cases, the local entity that is managing your recruitment will be responsible together with GlobalConnect A/S.
- 8.3. If you wish to contact us regarding our processing of your personal data, you may contact us by using the relevant contact information below.
- a) For Danish and German candidates:  
GlobalConnect A/S  
Havneholmen 6  
2450 København SV  
CVR: 26759722  
Phone: +45 7730 3000  
E-mail: [HR@globalconnect.dk](mailto:HR@globalconnect.dk)
  - b) For Norwegian candidates:  
GlobalConnect A/S  
Snarøyveien 36  
1364 Fornebu  
Phone: +47 38 99 02 99  
E-mail: [HR@globalconnect.no](mailto:HR@globalconnect.no)
  - c) For Swedish and Finnish candidates:  
GlobalConnect AB  
Sveavägen 25, 111 34  
Stockholm, Sverige  
Phone: +46 075-100 01 00  
E-mail: [HR@globalconnect.se](mailto:HR@globalconnect.se)

## 9. Changes to the policy

- 9.1. This Policy replaces previous versions. We reserve the right to make changes on an ongoing basis should our privacy practices change. In the event of significant changes, we will notify you on our webpage or as required by law. This Policy was last updated 11.02.2025. Your continued use of our website and participation in the recruitment process, also commenced processes, will be subject to this Policy.

## 10. Document version history

Version	Approval date	Changes