



# Gefion

GROUP

## **Privacy policy – recruitment**

Version: 16 January 2019

In connection with the recruitment of new employees to Gefion Group A/S ("Gefion"), Gefion collects and processes, as data controller, various personal data about job applicants.

This privacy policy provides statutory information about our processing of such data.

### **Categories of personal data and purposes**

We collect and process the following personal data:

Ordinary personal data:

- Name, address, e-mail address, telephone number, photography, date of birth, identification data about reference persons, CV, grade transcript and diplomas and civil reg. (CPR) number.

We process personal data for the following purposes:

- Recruitment: Review of the job application, assessment of the job applicant's professional and personal qualifications in relation to recruiting new employees to Gefion, obtaining and giving references in connection with the recruitment process.
- General: Compliance with applicable data protection and personal data legislation and other legitimate interests, e.g. communication with data subjects, documentation requirements, compliance with basic principles for processing of personal data and the legal basis for processing, implementation and maintenance of technical and organisational security measures, investigation of suspected or known security breaches and reporting to individuals and authorities, handling of enquiries and complaints from data subjects and others, processing is necessary for the establishment, exercise or defence of legal claims, handling of inspections by and enquiries from supervisory authorities, handling of disputes with data subjects and third parties, statistical surveys, mergers, acquisitions, disposals, sale of the company or parts thereof, including preparation of information memorandum, preparation and completion of due diligence, assessment of investments and other activities of such processes.



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## **Sources**

The personal data are collected directly from you or from external parties, e.g. previous employers in connection with references or recruitment agencies.

## **Legal basis**

The legal basis for the collection and processing of the above-mentioned personal data is as follows:

- Gefion processes personal data in connection with the recruitment of new employees. The processing is based on Gefion's legitimate interests in selecting the right candidates for the position, see Article 6(1)(f) of the General Data Protection Regulation.
- The disclosure to recruitment agencies is based on Gefion's legitimate interests in assessing and selecting the right candidates for the position, see Article 6(1)(f) of the General Data Protection Regulation.
- Gefion processes personal data concerning the job applicant's references and statements. The processing is based on your consent, see Article 6(1)(a) of the General Data Protection Regulation.
- Gefion stores applications for more than six months if you have given your consent, see Article 6(1)(a) of the General Data Protection Regulation.
- Gefion processes personal data concerning screening of employees, see Article 6(1)(c) of the General Data Protection Regulation, sections 8 and 11 of the Danish Data Protection Act and section 8 of the Danish Anti-Money Laundering Act.

You have the right to withdraw your consent. If you withdraw your consent, the withdrawal will not, however, affect the processing prior to the withdrawal of the consent.

When we collect personal data directly from you, you provide us with the personal data on a voluntary basis. If you do not provide us with the above personal data, we cannot evaluate you for the purpose of entering into an employment contract with you.

## **Disclosure of personal data**

The above personal data will be disclosed to and shared with the following recipients:  
Recruitment agencies for the purpose of assisting us in the assessment of job applicants.

## **Transfer of personal data to data processors**

We use a number of data processors, including hosting providers for IT systems, back-up and support.



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## **Transfer of personal data to recipients in countries outside the EU/EEA**

We transfer personal data to the following recipients in countries outside the EU/EEA:

- USA in connection with hosting based on the EU-U.S. Privacy Shield and the European Commission's standard contractual clauses of 2010 for the transfer to data processors in third countries.

## **Storage period**

We store personal data for as long as is necessary to be able to fulfil the above-mentioned purposes. The storage period will be a maximum of six months from receipt of your application in case of unsolicited applications or from the time of rejection of an application for an advertised position, unless you consent to your application being stored for a longer period of time.

## **Your rights**

You have – subject to the limitations of the applicable data protection legislation – the following rights:

- Right of access to your personal data
- Right to rectification of inaccurate and incomplete personal data
- Right to erasure of personal data
- Right to restriction of processing of the personal data
- Right to data portability (where the processing is based on consent or on a contract), i.e. the right to receive the personal data which you have provided to Gefion in a structured, commonly used and machine-readable format and the right to transmit those data to another data controller

You also have the right to file a complaint with the Danish Data Protection Agency.

## **Right to object**

You have the right to object – on grounds relating to your particular situation – to the processing of personal data, where the legal basis is legitimate interests as specified above. Subsequently, Gefion may no longer process the personal data unless Gefion demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims.

## **Contact**

If you have any questions about the processing of your personal data or your privacy rights, please contact us.

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