

**RECRUITMENT, JOB AGENT AND CV
DATABASE PRIVACY NOTE (HR)**



Title 4.3.2 RECRUITMENT, JOB AGENT AND CV
DATABASE PRIVACY NOTICE (HR)

Applies to Nordic Bioscience

Section GDPR

Effective Date 01JAN2024

Ver. 2.0

Revision History				
Completion date	Effective date	Version	Initials	Remarks
01JULY2020	01JAN2021	V1	TMJ	Procedure placed under new GDPR system
01DEC2024	01JAN2024	V2	JOL	Revised policy, including CV Database

Approval		
Author Johan Lønberg General Counsel, Legal	Date: 01JAN2024	Signature
Approver Morten Karsdal CEO	Date: 01JAN2024	Signature
Consulted DPO Lars Japp Haslund	Date: 01JAN2024	Signature

Title	4.3.2 RECRUITMENT, JOB AGENT AND CV DATABASE PRIVACY NOTICE (HR)	Ver. 2.0
Applies to	Nordic Bioscience	
Section	GDPR	
Effective Date	01JAN2024	

Recruitment, job agent and CV database privacy notice – Nordic Bioscience A/S

V2 2023

INTRODUCTION

Thank you for your interest in a job in Nordic Bioscience A/S.

As part of our recruitment process, we will process your personal data, as set out in this privacy notice. According to applicable data protection laws, including the General Data Protection Regulation (“GDPR”), we are obligated to provide you with the following information:

1. Data controller – how can you contact us?
2. Data Protection Officer
3. Recruitment
4. Job agent notification service
5. CV database
6. Your rights
7. Complain to a supervisory authority

1 Data controller – how can you contact us?

Nordic Bioscience A/S is data controller with respect to the personal data collected and processed as part of the recruitment process.

Nordic Bioscience A/S
CVR no. 30799968
Herlev Hovedgade 205
2730 Herlev, Denmark

If you want to exercise any of your rights or if you have any questions regarding this privacy notice or the processing of your personal data, you may contact us at email: legal@Nordicbio.com.

2 Data Protection Officer

We have appointed a Data Protection Officer (DPO). If you have questions regarding our processing of your personal data, you may contact our Data Protection Officer (the “DPO”) at email: dpo@nordicbio.com.

3 Recruitment

3.1 The purposes of the processing and the legal basis

The purpose of processing personal data on applicants is to recruit the most qualified candidates(s) for the job(s) in question.

Title	4.3.2 RECRUITMENT, JOB AGENT AND CV DATABASE PRIVACY NOTICE (HR)	Ver. 2.0
Applies to	Nordic Bioscience	
Section	GDPR	
Effective Date	01JAN2024	

Our legal basis is our legitimate interest as data controller to hire employees and in that process assess the applicants, their qualifications and potential fit to the job in questions or other potential job openings and to document lawfulness of recruitment process in case of complaints (GDPR art. 6.1.f.).

In connection with the finalisation of a recruitment process, final candidates will be asked to complete a test, and this will be included in our assessment of your application. The legal basis for this processing is your consent (GDPR art. 6.1.a). For certain executive and trusted positions, you will also be asked to bring a copy of your criminal record during the recruitment process. Here, the legal basis is consent (DBL § 8, subsection 3, cf. GDPR art. 10). The legal basis for processing your personal data is based on your request that we process your application and CV prior to entering an employment contract (GDPR art. 6.1.b).

3.2 Categories of personal data

Nordic Bioscience process personal data submitted by you to us in your application, CV and other documentation as well as the personal data you gave us during the recruitment process: *name, address, date of birth, gender, phone number, e-mail address, education, career history, recommendations, references etc.*

To evaluate your application, we will process the information, including the personal data, which you have disclosed in your job application and CV/Resume.

We recommend that you do not disclose sensitive personal data, such as information revealing racial or ethnic origin, religion, trade union membership, sexual orientation, health, etc. in your application. We cannot automatically delete or discard such information from your application and CV.

If the job position requires you to complete personality tests or similar you will be informed hereof when we have processed your application. The results of such tests or the absence of such due to lack of participation will be treated confidentially but will be included in our evaluation of your application. As the participation in personality tests rests on your consent, we cannot progress such without your participation which will form part of the assessment of the application.

We may also request that you provide us with a copy of your criminal record depending on the position for which you are applying. Such information will also be treated confidentially.

Further, the processing might include footage of you when visiting Nordic Bioscience premises if you attend a job interview; e-mail correspondence; right to work permits and documentation, and notes regarding information, performance and perception of you based on interviews.

3.3 Disclosures

In some cases, recruitment agencies, head-hunters, background check providers and credit reference agencies may also become involved in the recruitment. This will be specific to the recruitment process, and you will be notified when such third parties are part of the process.

As part of our evaluation of you and your application we may wish to take references from your previous and/or current employers. We will only take up references, if you have consented hereto

Title	4.3.2 RECRUITMENT, JOB AGENT AND CV DATABASE PRIVACY NOTICE (HR)	Ver. 2.0
Applies to	Nordic Bioscience	
Section	GDPR	
Effective Date	01JAN2024	

(GDPR art. 6.1.a.) References will solely be used to assess the candidate's competencies in terms of the job position. The notes from the references will be discarded as soon as the recruitment process has been made.

Your personal data may also be shared with our legal advisers as appropriate or other third parties to comply with our legal obligations.

Your personal data may be shared with other Nordic Bioscience group companies, if relevant. In such case, the transfer will be based on the EU Commission's Standard Contractual Clauses (SCCs) to ensure an adequate level of data protection with respect to such transfers. Otherwise, your consent will be obtained.

3.4 Where your personal data is obtained from

The personal data about you that we process are obtained from you, if relevant, the recruitment agencies involved and, if consented to, references from previous employers. Personality tests from thirds parties will be requested but is pending your request. For certain positions, information from public authorities and credit agencies may be required by way of consent from you.

3.5 Storage of your personal data

If you are offered a position with Nordic Bioscience A/S, your application and additional personal data obtained during the recruitment process will become part of your employee file for the duration of employment. You will also receive a privacy notice for employees.

If you are not offered a job, we will store your application and any additional personal data obtained during the recruitment process for a period of 6 months following our rejection, unless you have provided your consent to the storage an agreed longer period.

4 Job agent notification service

You may choose to sign up to our email job agent notification service which informs of new job postings based on you expressed job interest.

The purpose is to inform potential candidates of job openings based on their express consent to receive this information.

The personal data processed is your name, email and selected job type interest (all, research, laboratory, reception) and location (all, Herlev) and login information (email, password).

Legal basis for processing your personal data is your consent (GDPR art. 6.1.a). To verify the consent and contact information provided, your response via a confirmation email shall be received prior to activation of the service ("double opt-in").

The service will be active until you withdraw your consent. You can at any time to this either via the login information provided to you or by contacting us.

Title	4.3.2 RECRUITMENT, JOB AGENT AND CV DATABASE PRIVACY NOTICE (HR)	Ver. 2.0
Applies to	Nordic Bioscience	
Section	GDPR	
Effective Date	01JAN2024	

We will annually request you to verify the information and interests. If you do not react to the reminder emails, your job agent will be deleted.

5 CV database

You may choose to sign up to our CV database in order to be considered by us for relevant job opportunities in Nordic Bioscience.

The purpose with the processing of your CV is to provide an opportunity for you and Nordic Bioscience to make a recruitment match in case a relevant job opportunity arises.

Legal basis for processing your personal data is your consent (GDPR art. 6.1.a). We will request you to reconfirm you consent at relevant intervals. The entire profile will be deleted if the consent is not reconfirmed. You can withdraw consent at any time by contacting us.

Nordic Bioscience processes personal data submitted by you to us in your application, CV and other documentation as well as the personal data you gave us during the recruitment process: *name, address, date of birth, gender, phone number, email address, education, career history, recommendations, references etc.* To evaluate your CV, we will process the information, including the personal data, which you have disclosed in your job application and CV/Resume.

We recommend that you do not disclose sensitive personal data, such as information revealing racial or ethnic origin, religion, trade union membership, sexual orientation, health, etc. in your CV/application. We cannot automatically delete or discard such information.

If you are part of a recruitment process based on your CV, this privacy notice sections re. recruitment will apply.

6 Your rights

Applicable data protection regulation grants you several rights in relation to our processing of your personal data.

If you wish to exercise these rights, please contact us via dpo@nordicbio.com. We have the right to request identification information from you to verify your identity.

Withdraw consent

You have the right to withdraw your consent to the processing of your personal data at any time by contacting us at legal@nordicbio.com.

Withdrawal of your consent will not affect the legality of previous processing of your personal data based on the consent up until the time of withdrawal. If you withdraw your consent, such withdrawal will only have effect from the time of withdrawal.

Right of access

You have the right to obtain from us confirmation as to whether personal data concerning you are being processed, and you are allowed to access your personal data.

Title	4.3.2 RECRUITMENT, JOB AGENT AND CV DATABASE PRIVACY NOTICE (HR)	Ver. 2.0
Applies to	Nordic Bioscience	
Section	GDPR	
Effective Date	01JAN2024	

Right to rectification

You have the right to have inaccurate personal data concerning you corrected (rectified).

Right to erasure

In some cases, you have the right to have personal data erased earlier than what would normally apply to that data.

Right to restriction of processing

In some cases, you have the right to obtain a restriction of processing of your personal data.

Right to data portability

In some cases, where information is provided by you based on your consent, you have the right to receive your personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us.

Right to object

In some cases, you have the right to object, on grounds relating to your particular situation, to processing based on our legitimate interests, cf. point (f) of Article 6(1) in the GDPR.

7 Complaint to a supervisory authority

You have the right to lodge a complaint with the Data Protection Agency where you are located, if you are unsatisfied with the way that we process your personal data. The Danish Data Protection Agency's contact information can be obtained through www.datatilsynet.dk.