

KROMANN REUMERT'S PRIVACY POLICY FOR JOB APPLICANTS

In connection with the recruitment of new employees for Kromann Reumert, we will collect and process your personal data when assessing your application. We will collect the personal data from your application, CV, grade transcripts, attachments, searches on social media and other official channels, and possibly references from previous employers.

1. WHAT PERSONAL DATA DOES KROMANN REUMERT PROCESS ABOUT YOU

1.1 General personal data

As part of the recruitment process, we will process e.g. the following general personal data about you: Name, contact details, date of birth, education, information about previous employers, experience and references.

If you are asked to complete a profile test and a cognitive test in the recruitment process, we will also process the results of such tests.

If you subscribe to our job agent, we will process your name, address, title, email, location and work area.

1.2 Sensitive personal data and civil registration (CPR) number

As a general rule, we will not process any sensitive personal data about you.

You should only submit necessary and relevant personal data when applying for a job at Kromann Reumert. Therefore, please do not send us your civil registration number, information about your political opinion, trade union membership, etc. We also recommend that you anonymise/cross out any civil registration number on grade transcripts etc., as we do not need to process that number in the recruitment process. If you suffer or have suffered from an illness that will have a significant impact on your ability to perform the job applied for, you must inform us of that during a job interview (if applicable) at the latest, after which we will, if relevant, process your personal data in compliance with personal data law.

1.3 Data about criminal offences

If you are offered employment, you will be asked to submit a criminal record certificate, but we do not process such personal data in connection with the employment process.

2. PURPOSE OF AND LEGAL BASIS FOR PROCESSING OF YOUR PERSONAL DATA

We will process your personal data for the purpose of assessing your suitability for a specific position at Kromann Reumert. The legal basis for our processing is Article 6(1)(b) of the General Data Protection Regulation concerning the entering into a contract, or the rule on balancing of interests in Article 6(1)(f) of the General Data Protection Regulation. Personal data obtained from the job agent, the profile and cognitive tests, references and social media searches will be processed on the basis of the rule on balancing of interests in Article 6(1)(f) of the General Data Protection Regulation. If, after the recruitment process, we retain your job application and any results of your profile and cognitive tests for possible recruitment for other jobs at Kromann Reumert, we will ask for your consent (see Article 6(1)(a) of the General Data Protection Regulation).

3. RECIPIENTS OF YOUR PERSONAL DATA

Kromann Reumert has engaged a number of data processors to perform work on our behalf. Those data processors will have access to your personal data. However, they can only access and process your personal data lawfully on our behalf to achieve the purposes specified by us. The data processors may, for example, be providers of personality tests, recruitment systems or other IT solutions.

4. TRANSFER OF YOUR PERSONAL DATA TO THIRD COUNTRIES

As a general rule, your personal data will not be transferred to a third country by way of disclosure, but a transfer may take place in connection with our use of data processors.

If your personal data are transferred to third countries, i.e. countries outside the EU/EEA, we will ensure an adequate level of protection for such transfer.

A transfer of personal data to a country outside the EU/EEA (insecure third country) whose level of protection has been assessed to be adequate will not require any specific authorisation. Personal data may be transferred to such third countries without further ado.

Transfers to so-called insecure third countries may take place on various transfer bases with safeguards providing adequate protection of the rights of the data subjects. Examples include adoption of the European Commission's standard contractual clauses on data protection, or use of recipients that are subject to special certification mechanisms such as the EU-U.S. Data Privacy Framework in the event of data transfer to the USA.

Where no special safeguards are in place, personal data may still be transferred to a recipient in an insecure third country if a specific basis for the transfer exists, for example if a consent has been given to the transfer, or if the transfer is necessary for the performance of a contract with a company in an insecure third country, or if the transfer is necessary in relation to a legal claim. The specific transfer bases are set out in Article 49(1) of the General Data Protection Regulation.

5. RETENTION PERIOD

We will retain your personal data for as long as is necessary to fulfil the purposes described above. Thus, we will retain your personal data until the position has been filled and the recruitment process has been completed. If you are offered a position at Kromann Reumert, your personal data will become part of your personnel file in the People & Development (HR) department. If you are rejected for a position at Kromann Reumert, we will retain your personal data for up to 6 months after the end of the recruitment based on your consent (see Article 6(1)(a) of the General Data Protection Regulation), after which the data will be deleted, unless we need to keep the data longer due to specific circumstances (see Article 6(1)(f) of the General Data Protection Regulation) where the legitimate interests include the establishment, exercise or defence of a legal claim. Profile and cognitive tests will be deleted after a maximum of 6 months. We will delete the data in the job agent when you unsubscribe.

Personal data that are no longer necessary to fulfil the purposes described above will generally be deleted on an ongoing basis.

6. YOUR RIGHTS

You have the following rights (subject to the conditions and exceptions provided by applicable law from time to time):

- The right of access to personal data
- The right to have inaccurate and misleading personal data rectified
- The right to be forgotten
- The right to restrict the processing of personal data
- The right to data portability (where processing is based on consent)
- The right to object to the processing of personal data (where processing is based on legitimate interests).

Below you can read about your rights to rectification, erasure, restriction and objection.

Right to rectification (correction)

You have the right to have incorrect data about you rectified. You also have the right to have your data supplemented with additional data if this will make your personal data more complete and/or up-to-date.

Right to erasure

In some cases, you have the right to have your data erased before expiry of our general data retention period.

Right to restriction of processing

In certain situations, you have the right to have the processing of your personal data restricted. If you have a right to restriction of processing, any future processing by us – with the exception of retention – may take place only with your consent or for the purpose of establishing, exercising or defending a legal claim, for the purpose of protecting a person, or for important reasons of public interests.

Right to objection

In certain situations, you have the right to object to our lawful processing of your personal data. You can also object to the processing of your data for direct marketing purposes.

Right to objection

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 stated above. Kromann Reumert will in that case no longer have a right to process the personal data, unless Kromann Reumert demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

To learn more about your rights as a data subject, see the Danish Data Protection Agency's guidance, which is available on www.datatilsynet.dk.

If you wish to exercise your rights, please contact us (see contact details in paragraph 7).

We have taken a number of measures to protect your personal data and safeguard your rights. Because of our processing of personal data about you, you will have the rights set out above. However, the rights apply in certain circumstances only.

7. QUESTIONS OR COMPLAINTS

If you have any questions regarding the processing of your personal data or the exercise of your rights, please feel free to contact us:

Kromann Reumert (the data controller)
Christina Helbro, CPO Chief Protection Officer
Sundkrogsgade 5
DK-2100 Copenhagen Ø
Central Business Register (CVR) no. 62 60 67 11
Telephone no.: +45 7012 1211
E-mail: cre@kromannreumert.com

If you want to complain about our processing of your personal data, you may file a complaint with the Danish Data Protection Agency. The Agency's contact details are available on <https://www.datatilsynet.dk/kontakt>.

8. AMENDMENTS TO THIS PRIVACY POLICY

This Privacy Policy will be updated and amended regularly and if required due to changes to legislation, practices and rules and regulations in the data protection area. We therefore recommend that you stay up-to-date at all times.

Latest update: 14 November 2023