

Privacy Policy for Applicants in the Recruitment Process

Data Controller

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("the Organisation")

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1. Introduction

1.1 This privacy policy ("the Policy") describes how the Organisation ("us", "we" or "our"), as data controller, collects and processes personal data about you in connection with the handling of your job application and during the recruitment process.

1.2 The Policy is prepared and made available to comply with the General Data Protection Regulation (2016/679 of 27 April 2016) ("GDPR") and the rules therein regarding the duty to provide information.

2. Personal data we collect about you

2.1 We process personal data about you when this is relevant and in accordance with applicable legislation. Depending on the specific circumstances, the processed personal data may include the following types of personal data: name, address, telephone

number, e-mail address, date of birth, CV, application, profile picture, educational certificates, references from previous employers, information from social media that is publicly available and relevant, IQ and personality tests, personal identification number (CPR).

2.2 We do not process sensitive personal data, i.e. the special categories of personal data defined in GDPR, Article 9(1).

2.3 As a general rule, we only collect personal data about you directly from you. If, under special circumstances, we collect personal data about you from other sources, we will inform you accordingly, including by updating this Policy.

2.4 If we need to collect and process additional personal data beyond what is stated above, we will inform you at the time of collection. Such information may also be provided by updating this Policy.

3. Purpose of processing of your personal data

3.1 Personal data that we collect about you is processed for the following purposes:

- a) To process applications and recruit relevant candidates.
- b) To establish and maintain a database of relevant candidates for positions within our Organisation.
- c) To collect, process and store personal data to the extent required under applicable legislation, including accounting and bookkeeping legislation.

4. Legal basis for processing of your personal data

4.1 We only process your personal data when we have a lawful basis in accordance with the GDPR. Depending on the circumstances, the processing of personal data takes place on the basis of the following legal grounds:

- a) If we have requested your consent to process specific personal data, the legal basis for processing such personal data is your consent, cf. GDPR, Article 6(1)(a).
- b) The processing is necessary for the purposes of legitimate interests pursued, where your interests or fundamental rights and freedoms requiring protection of personal data do not override those interests, cf. GDPR, Article 6(1)(f), and Section 12(2) of the Danish Data Protection Act.
- c) The processing is necessary for compliance with applicable legislation, cf. GDPR, Article 6(1)(c), and/or for compliance with employment law obligations under legislation or collective agreements, cf. Section 12(1) of the Danish Data Protection Act.

5. Disclosure and transfer of your personal data

5.1 We only disclose personal data to others when permitted or required by law.

5.2 We disclose personal data to the following recipients within the EU/EEA:

- a) Data processors
- b) The Danish Tax Agency (SKAT) (in connection with accounting, etc.)
- c) Banks (in connection with payments, receipt of payments, etc.)

5.3 We generally use various external and professional organisations as suppliers and partners to deliver or assist us in delivering our services and products. These external organisations will not receive or process personal data unless legislation permits such transfer and processing. If the external organisations or partners act as data processors on our behalf, their processing of personal data will always take place in accordance with a data processing agreement that meets legal requirements. If they act as independent data controllers, their processing will take place in accordance with their own privacy or data protection policies, which they will inform you about, unless otherwise required by law.

5.4 We do not transfer personal data to countries or international organisations outside the EU/EEA.

6. Deletion and retention of personal data

6.1 We ensure that personal data is deleted when it is no longer relevant for our processing purposes as described above. We always retain personal data for the period required by applicable legislation, including for documentation of compliance with, among other things, the Danish Bookkeeping Act.

If you are employed, your personal data in connection with the application will be transferred to our HR administration system. If you are not employed, your personal data will generally and in accordance with Danish law be deleted after a maximum of 6 months. If there are specific employment law reasons, personal data may continue to be processed for such specific purposes despite the above. This includes, among other things, that we may retain applications for a longer period in order to document that no unlawful discrimination has taken place in connection with the selection process, if we consider this necessary. It may also be relevant for us to process personal data for a limited period if a similar relevant position becomes available, or if another candidate withdraws from the recruitment process.

If you have questions regarding the storage and processing of your personal data, you are welcome to contact us at the e-mail address provided in the final section of this Policy.

7. Your rights

7.1 As a data subject, you have a number of rights:

7.1.1 You have the right to request access to the personal data we process about you, the purpose of processing, and whether we disclose the data to others.

7.1.2 You have the right to have incorrect personal data about you rectified.

7.1.3 In certain cases, you have the right to have certain personal data deleted.

7.1.4 In certain cases, you have the right to restrict the processing of your personal data so that we only store your data for a given period.

7.1.5 In certain cases, you have the right to object to our processing of your personal data on grounds relating to your particular situation.

7.1.6 You have the right not to be subject to a decision based solely on automated processing without human intervention, unless the decision is necessary for your employment with us, or is authorised by law or your explicit consent.

7.1.7 Where we have obtained your consent for part of the processing of your personal data, you have the right to withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

7.1.8 In certain cases, you have the right to data portability of the personal data you have provided to us.

7.1.9 You may always lodge a complaint with the Danish Data Protection Agency.

7.2 There may be conditions or limitations to these rights. Therefore, it is not certain that you have, for example, the right to data portability in a given case – this depends on the specific circumstances of the processing activities.

8. Changes to the Policy

8.1 We reserve the right to update and amend this Policy. If we change the Policy, we will update the date and version at the top of the document. In the event of material changes, we will notify you by means of a visible notice on our website, by e-mail or by other communication channels.

9. Contact

9.1 For questions or comments regarding this Policy, or to exercise one or more of your rights, you may contact us at:

gdpr@dykon.dk