

# general data protection information to job applicants

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## introduction

The purpose of this general information is to describe how and why we process your personal data, and your rights as data subject.

Personal data is any information relating to you or which can identify you.

Processing of personal data is any operations performed in connection with collection, recording, storage, publication and compilation of personal data.

The Akelius Group takes data protection and your data privacy seriously.

We may provide additional information or collect consent, to allow for processing of your personal data for specified purposes.

Such additional information or consent takes precedence over the general information provided below.

## controller

Your prospective employer is controller of your personal data for you as job applicant.

If you are not sure which legal entity in the Akelius group is your prospective employer,

please ask the contact person in the job ad you have answered or otherwise direct your question to the Akelius Staff department in your country of residence.

## which personal data we process

Akelius obtains your personal data from the following sources.

### from you

Personal data which you provide or have provided as part of your employment or engagement application with your prospective employer.

You will provide, or have provided, certain personal data about yourself.

Such information may for example include your CV, name, education and other qualifications, grades, contact details such as telephone number and e-mail address, and other information relevant for your application as requested by the prospective employer.

### from the application process

Personal data which arises from your application process for employment or engagement.

As part of the application process for employment or engagement with the Akelius Group, the prospective employer or another entity in the Akelius Group will create or add different types of information about you, depending on which stage of the recruitment process you have reached.

Such information may for example include information generated from performance evaluations such as application performance reviews, employment history and letters of recommendation as well as interview notes.

### from third parties

Personal data can also be collected from third parties such as service providers to the prospective employer, for example

- training and education companies, for example professional licenses and certifications, participation information, and
- references you have provided

## why we process your personal data and on which legal bases

The prospective employer will process your personal data when necessary for taking steps on your request prior to entering into an employment contract.

The prospective employer will process your personal data as necessary in its legitimate interests, except where these interests are overridden by your interests or your fundamental rights and freedoms.

The prospective employer processes your personal data on this legal basis for the purposes of

- entering into an employment contract,
- recruitment, meaning processing of your personal data for collecting and reviewing your application, assessing your skills, experience and suitability for the position in the Akelius Group for which you have applied, and
- management activities related to recruitment, such as performance evaluation and professional assessments, where the legitimate interests pursued are to ensure the availability of required skill and competency

The prospective employer will process your personal data to the extent required for carrying out our obligations and exercising our specific rights in the field of employment and social security and social protection law.

This includes processing for the purpose of

- establishment, exercise or defense of legal claims.

In some cases the prospective employer may be required to process your personal data to fulfil a legal obligation.

In such cases, the prospective employer will inform you of the processing,

unless legally prohibited to do so.

To the extent Akelius processes "sensitive data",

which includes special-category data,

such as information about health or trade union membership, biometric or genetic data and criminal-offence data,

such processing is only carried out to the extent the processing is

- necessary for carrying out Akelius' obligations and exercising Akelius' specific rights in the field of employment and social security and social protection law

- related to personal data which have been manifestly disclosed or made public by the job applicant
- necessary for the assessment of the working capacity of a job applicant
- necessary for the establishment, exercise or defense of legal claims

## transfer of personal data

The countries to which personal data may be transferred are Sweden, Germany, the United Kingdom, Denmark, France, Canada and the USA.

Our IT suppliers may also process personal data on our behalf in other countries within or outside the EU or EEA. We will take appropriate measures to protect your personal data in cases of such transfers, for example by entering data processing agreements or other arrangements.

Canada has an adequate level of protection, according to an EU Commission decision on the adequacy of personal data in third countries, under Article 45 of the EU General Data Protection Regulation. Your personal data may be transferred to Canada without additional safeguards.

We have taken necessary measures within our intra-group legal structure to safeguard any transfers of personal data to the USA and other countries outside the EU or EEA. These measures include entering agreements containing standard data protection clauses, as adopted by the EU Commission under Article 46 of the EU General Data Protection Regulation.

We may also share your personal data with authorities if we are required by law, verdict or decision. This means your personal data may be transferred to countries other than where your prospective employer is based. If you want more information on how the Akelius group protects your data, see *contact details* below.

## how long

We do not store your personal data longer than necessary for the purposes listed above or required by law. Then we delete or anonymize your personal data so that it can no longer be connected to you.

For data processing activities where there is no legal obligation or rule about a specific retention period for your personal data, the criteria used to determine the data retention period is that your personal data must not be stored longer than necessary for the purposes for which the data is processed.

The prospective employer may also keep details of the employment application and related records after the application process, for example in the event of a dispute with a job applicant or to preserve certain information for administrative tasks and purposes.

## your rights

You have a number of rights as data subject, subject to applicable data protection legislation:

*Right of access* – the right of access to your personal data, meaning you are entitled to a confirmation as to whether or not personal data concerning you is being processed. And where that is the case, access to the personal data and certain additional information on the processing.

*Right to rectification* – the right to rectification of inaccurate personal data concerning yourself, and to have incomplete personal data completed.

*Right to erasure* – the right to have your personal data erased if

- the personal data are no longer necessary in relation to the purposes for which they are processed
- you withdraw your consent to the processing and there is no other legal ground for the processing
- the processing of your personal data is not necessary for compliance with a legal obligation, for the establishment, exercise or defense of legal claims or archiving or scientific purposes

*Right to withdraw consent* – if you have consented to specific processing,  
the right to withdraw your consent at any time.  
The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

*Right to object* – the right to object and request a new assessment of legitimate interests when processing is based on these grounds.  
We will then make a new assessment and will only continue processing,  
in spite of your objection, if we can demonstrate compelling legitimate grounds which override your interests.

*Right to data portability* – the right to data portability, meaning you are entitled to receive the personal data concerning yourself which you have provided us with, and to transmit those data to another controller.

*Right to restriction* – the right to restriction of your personal data,  
for example if you contest their accuracy or if you have objected to the processing as described above.  
In both cases this right is applicable during our processing and verification of your request.

*Right to lodge a complaint with a national data protection authority* – you may also lodge a complaint with a national data protection authority, if the prospective employer's processing of your personal data does not meet the requirements under applicable law.

## contact details

If you have any questions about how the Akelius group processes your personal data,  
or if you want to exercise your rights as listed above,  
please contact the responsible recruiter stated in the job ad.

You can also contact Akelius Group Privacy Officer

Akelius Group Privacy Officer  
Box 38149  
100 64 Stockholm  
E-mail: [gpo@akelius.com](mailto:gpo@akelius.com)