# Personal data policy

### 1. Data controller

The data controller is:

Regarding applications in Nuuday A/S: Nuuday A/S, Teglholmsgade 1, 2450 København SV, cvr.nr. 40075291

Regarding applications in TDC Telco ApS: TDC Telco ApS, Gullandsstræde 2, 4000 Roskilde, cvr.nr. 27965342.

Regarding applications in Hiper A/S: Langebrogade 6B, 1411 København K, cvr.nr. 36909080.

In the following, the data controller is referred to as "the company".

# 2. The Data Protection Officer (DPO):

Contact: dpo@nuuday.dk

#### 3. The purposes and the legal basis for the processing

The data you provide is voluntary, but necessary in order to be considered for the position, as the purpose of registration is to create a qualitative, quick and easy way to connect applicants with jobs, and find the best candidate based on an individual assessment of the candidates' skills and qualifications. The purpose of the processing after completing the recruitment process is providing feedback and documenting the recruitment process in the event of any legal claims.

## Non-special categories of personal data

The company recommends that you do not include special categories of personal data it in your application or CV but only provides us with data such as name, address, education, former education and other qualifications. The company processes this type of data based on Article 6 (1) (c) and (f).

# *Special categories of personal data and personal data relating to criminal convictions and offences*

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. Data about criminal convictions and offences is a special type of personal data.

The company recommends that you do not include these data in your application or CV. If your application and CV nonetheless contains this type of data, the company processes such data based on the Danish Data Protection Regulation Article 8 (5) cf. Article 7 (1) and Article 9 (2) (f) of the General Data Protection Regulation.

## References

It is a requirement according to the security certifications the company follows that the necessary background checks are carried out on the employees. The company may therefore need to be able to verify your information in the application and obtain additional information from your previous employers in order to ensure that you possess both the professional and personal qualifications necessary to hold the position, you have applied. The company will use contact persons specified by you but may also contact others.

In general only non-special categories of data is collected pursuant to Article 6, (1) (f), about e.g. time of employment and work tasks, but information of a more subjective nature can also be obtained about e.g. professional or social skills.

## Cpr. Number

The company uses electronic signature via e-boks for signing of employment contracts. If you are offered a job you may be asked for your identification number (cpr number), since the company needs it in order to send the employment contract via e-boks, cf. the Danish Data Protection Regulation Article 11, (2) no.3. The company also proces your cpr. number if it is provided by you in your CV, diplomas etc., cf. the Danish Data Protection Regulation Article 11, (2) no. 4, cf. Article 7 (2).

## Photo

When you are interviewed the company may ask for a passport photo of you in order to prepare an ID Card for you. The ID card will be delivered when hired and must always be visible within the premises of the company. The photo on the ID card is a security measure to ensure unambiguous identification of the persons moving around in the company's buildings and ensuring that unauthorized persons are not allowed.

## Work Permit

The If employed, you will be asked to submit documentation for proof of right of employment in Denmark. For Danish citizens, this will typically mean a copy of the passport, while citizens from other nations will be asked for documentation of a valid work permit. This information will be registered in NuuPeople and the submitted documentation stored in your electronic personnel file. This is due to the fact that the company by law is required to document that only employees with a valid work permit are employed. The information you disclose is processed on the basis of Article 6 (1) (c) of the Data Protection Regulation, cf. section 13 of The Alien's Act.

If necessary, we collect your consent in order to retrieve references from previous employers or other relevant third parties or if we need to collect your criminal record. If employed in call centers, we can, if necessary, collect your consent for the purpose of recording of phone conversations with costumers. The processing of these personal data is based on GDPR Article 6 (1) (a).

## Criminal record

The company may, before a final position is taken on employment, request a criminal record based on the company's security requirements. It is not a requirement that the criminal record be clean. The purpose of seeing the criminal record is to be able to assess whether there is anything in your previous behavior and lifestyle that makes it incompatible with employment in exactly the position you are in the process of being employed in. Information about criminal offenses is processed according the Danish Data Protection Regulation Article 8, (3).

# 4. Recipients of your data

Your data will be treated confidentially and will only be available to employees involved in the recruitment process, i.e. the hiring manager and the HR employees responsible for the job posting. If you get the job, your closest colleagues will be notified of your employment, date of accession, job title, education and previous professional experience, if relevant.

The company will contact you before consulting any of your listed references if consent has been given.

Data processor: Nuupeople has been developed in cooperation with Cornerstone OnDemand Limited, Reg. no. 07143111, 4 Coleman Street, London, EC2R 5AR, United Kingdom so that Cornerstone OnDemand Limited is a data processor providing the software and storing the data on behalf of Nuuday and its subsiduaries.

Nuuday A/S is data processor for TDC Telco ApS and Hiper A/S when recruiting.

The company may use different data processors such as suppliers of tests and video applications.

The company may transer your personal data to recipients outside the EU and EEA. In those situations, your personal data will be processed in accordance with the personal data protection rules. In some cases, the countries are approved by the EU Commission as a so-called "safe third country", and otherwise the transfer takes place on the basis of the EU Commission's standard contract provisions.

You can obtain a list of the current data processors and the possible basis for transfer to recipients outside the EU/EEA by sending an email to **hrhelpdesknuuday@nuuday.dk**.

## 5. Social media

The company does not systematically use social media such as Facebook and LinkedIn but uses the social media when it is relevant to provide information about the candidate's suitability for the job.

If you have published information about yourself online, the company may use the information for recruitment purposes as long as the information is legitimate and relevant in the recruitment process, cf. Article 6 (1)(f), Article 9 (2) (e), and Article 5 of the General Data Protection Regulation. The same applies to information about you that others have published.

The company can use e.g. Facebook for job postings. When you visit the company's Facebook page, the company, together with Facebook, is responsible for the processing of personal data associated with Facebook's use of cookies from the site. You can read more about this on the company's Facebook page.

## 6. Storage and erasure of data

If you do not get the job and you make no changes to your profile, your CV and application will be deleted no later than six months after the date of refusal.

However, you can delete the data at any time prior to this by logging into your profile. Log in using your username and password, click on the arrow to the right of the position you have applied for and select 'Cancel'.

The company will store personal data about candidates, that are employed, for up to five years after employment has ended.

# 7. Your rights

According to the General Data Protection Regulation as an applicant, you have a wide range of rights as to the company's processing of your personal data. These rights are listed below:

## Right of access

You have the right to access and to obtain confirmation as to whether or not personal data concerning you are being processed and different information on this matter.

## Right to rectification

You have the right to obtain the rectification of inaccurate personal data concerning you.

## Right to erasure

You can have the right to obtain the erasure of your personal data before the company's general erasure date within six months.

## Right to restriction of processing

Under certain circumstances, you have the right to obtain the restriction of processing. Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

#### Right to object

Under certain circumstances you have the right to object to processing of your personal data.

#### Right to data portability

Under certain circumstances 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.

#### Right to withdraw consent

If processing is based on consent, you have the right to withdraw your consent. Your withdrawal does not affect the lawfulness of processing prior to the withdrawal.

Where do you read more about your rights

You can read more about your rights at the home page of the Danish Data Protection Agency: **www.datatilsynet.dk** 

If you want to use your rights contact:

Nuuday A/S HR Services Teglholmsgade 1 2450 Copenhagen SV

## hrhelpdesknuuday@nuuday.dk

## 8. Complaints

If you do not agree with the way in which the company processes your personal data, we recommend that you always discuss the matter with HR Services first. If you want to complain you can send your complaint to:

Datatilsynet Carl Jacobsens Vej 35 2500 Valby

You read more at www.datatilsynet.dk.

## 9. Liability disclaimers

Please note the following:

If you misuse this service for unauthorised or illegal purposes, the company is entitled to immediately exclude you from using the system and to delete your CV and application.

You cannot make the company liable for any losses resulting from us changing or

discontinuing the service, or due to operational disruptions or faults of any kind, including viruses. The same applies to losses due to not having access to your registered information for a period of time, regardless of the reason.

## **10.** Receipt acknowledgment

When we have received your application you will receive a confirmation via email.