

# Privacy policy for applicants and recruitment

## **Controller**

Qmed Consulting A/S  
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DK 1150 Copenhagen  
CVR-nr.: 30564278

(the "**Organization**")

## **1. Introduction**

- 1.1 The privacy policy for job applicants in connection with the recruiting process (the "**Privacy Policy**") describes how the Organization as the controller (the "'us", "we", or "our'") as part of the recruiting processes, collects and processes personal data relating to job applicants. The Organization is committed to being transparent about how we collect and use personal data and meeting our data protection obligations. As a controller, we collect and process personal data about you in connection with handling your job application and in the recruiting process.
- 1.2 This Privacy Policy is prepared and made available to you to comply with the (EU) General Data Protection Regulation (2016/679 of 27 April 2016) (the "**GDPR**")

## **2. Types of personal data we process about you**

- 2.1 We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data: name, address, phone number, email address, CV, profile picture, educational documents, references from former employers, information from social media that is publicly available and relevant, social security number.
- 2.2 We do not process sensitive personal data, i.e., the special categories of personal data, as defined in GDPR, Article 9(1).
- 2.3 As a general rule, we only collect personal data about you directly from you. If specific circumstances allow or require us to collect personal data about you from third parties, we will only do it when relevant and to the extent necessary. We will inform you hereof, which may be done by updating this Privacy Policy. Personal data is also collected from publicly accessible profiles on social media.
- 2.4 If we need to collect more personal data than what is specified above, we will inform about this. Such information may be provided by updating this Privacy Policy.

## **3. Purposes for processing the personal data**

- 3.1 The personal data which we collect about you are processed for the following purposes:
  - a) To process job applications and to recruit the relevant candidates.

## **4. Legal basis for processing personal data**

- 4.1 We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal bases:

- a) If we have asked for your consent for the processing of your personal data, the legal basis for the processing of such personal data is your consent, cf. GDPR, Article 6(1)(a). Your consent can always be withdrawn by contacting us via the contact details provided at the end of this Policy, and, if the consent is withdrawn, the personal data processed on the basis of consent is deleted, unless it can or must be processed, for example, in order to comply with legal obligations.
- b) The processing is necessary to comply with applicable legislation, cf. GDPR, Article 6(1)(c), including any specific rules on the processing of personal data in the employment context as provided in GDPR, Article 88 such as section 12(1) of the Danish data protection law.
- c) The processing is necessary and in the Organization's legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms, cf. GDPR, Article 6(1)(f).
- d) The processing is necessary to take steps at your request prior to entering into a contract, cf. GDPR, Article 6(1)(b).

## **5. Disclosure and transfer of personal data**

5.1 No, our company is not part of a concern / company group.

5.2 We transfer personal data to the following recipients from the EU/EEA:

- a) Data processors
- b) Banks (for example in connection with payments etc.)
- c) Tax authorities (for example in connection with accounting etc.)
- d) Collaborators

5.3 From time to time we use third parties as suppliers to assist us in delivering our services. The third parties will not receive or process personal data unless the applicable law allows for such transfer and processing. Where the third parties are processors, the processing is always performed on the basis of a data processing agreement and in accordance with the requirements under GDPR. Where the third parties are controllers, the processing of personal data will be performed based on the controller's data privacy policy and legal basis that the external parties are obligated to inform about unless the applicable legislation allows otherwise.

5.4 We transfer personal data to countries or international organisations outside the EU/ EEA. Personal data is transferred to the following countries: USA. Such transfers are based on the standard contractual clauses about data protection made or approved by the EU Commission and possibly approved by a national data protection agency, ensuring a sufficient level of protection.

5.5 If you have any questions about our use of processors, cooperation with other controllers, including subsidiary companies, or transfer of data to third countries, please contact us for more information or documentation of our legal basis for such transfers.

## **6. Erasure and retention of personal data**

6.1 We ensure that your personal data is deleted when it is no longer relevant for the processing purposes as described above. We always retain personal data to the extent that we have a legal obligation to do, for example in the case of accounting and bookkeeping materials and records.

If you are offered a position and become an employee in the Organization, your personal data from the job application and data from the recruiting process are transferred/moved to our regular HR management system.

If you are not offered a position in the Organization, your personal data is erased after 6 months in accordance with applicable law. Notwithstanding the above, specific reasons related to employment law may necessitate the continuous processing of personal data. This may have different implications. For example, we may process the applications for a longer period to prove that there was no unlawful discrimination in the selection process when we consider this necessary. Similarly, it may be relevant to process the personal data for a limited period if a similar relevant position may become available during this period, or if another candidate opts out of the recruiting process.

If you have any questions about our retention of your personal data, please contact the email mentioned under the last section of this Privacy Policy.

## **7. Your rights as a data subject**

7.1 As a data subject under GDPR, 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 purposes we process the personal data, and whether we disclose or transfer your personal data to others.
- 7.1.2 You have the right to have incorrect information rectified.
- 7.1.3 You have the right to have certain personal data deleted.
- 7.1.4 You may have the right to restrict our processing of your personal data.
- 7.1.5 You may have the right to object to our processing of your personal data based on reasons and circumstances that pertain to your particular situation.
- 7.1.6 You have the right not to be subject to a decision based solely on automated means, without human interference unless the decision is necessary for your employment, the decision has a legal basis, or is based on your explicit consent.

- 7.1.7 If the processing of your personal data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal of consent.
- 7.1.8 You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- 7.1.9 You can always lodge a complaint with a supervisory authority.
- 7.2 Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to for example data portability in the specific situation; it will depend on the circumstances of the processing.
- 7.3 In connection with inquiries concerning your rights, we ask that you provide us with adequate information to process your inquiry, including your full name and your email address, so that we may identify you and respond to your inquiry.

## **8. Changes to this Policy**

- 8.1 We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the bottom of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example on our website or by direct message.

## **9. Contact**

- 9.1 You may contact us at the below-specified email if you:

- disagree with our processing or consider our processing of your personal data infringes on the law,
- have questions or comments to this Privacy Policy, or
- want to invoke one or more of your rights as a data subject described in this Privacy Policy.

If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at [gdpr@qmed-consulting.com](mailto:gdpr@qmed-consulting.com).

- 9.2 We strive to do everything to meet your wishes regarding our processing of your personal data and your rights as a data subject. If you despite our endeavors you wish to file a complaint, you can do so by contacting the national data protection agency.

Yours Sincerely,

Qmed Consulting A/S