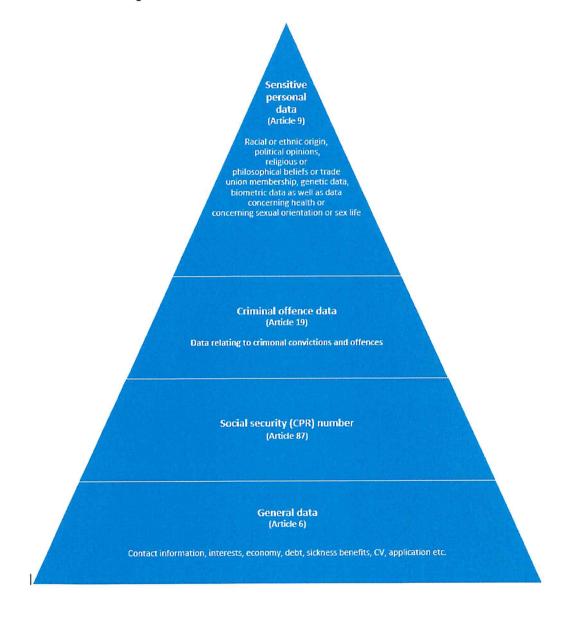
# **GENERAL DATA PROTECTION REGULATION**

25 May 2018

# **Policy in relation to APPLICANTS**





# Contents

Personal data protection policy, applicants	3
1. Data responsibility	3
1.1 Data protection	
1.2 Data protection Contact person – contact information	3
2.1 Types of personal data	
2.2 The reason for processing personal data	4
2.3 Scope of data	4
2.4 Checks	4
3. Security	5
5.4 Right of deletion	
	1. Data responsibility

## 1. Personal data protection policy, applicants

#### 1. Data responsibility

#### 1.1 Data protection

As part of the recruitment process, the company processes all personal data and has therefore adopted this privacy protection policy, which explains how your data is processed and what rights you have when registered.

In order to protect your personal data as effectively as possibly we regularly assess the risk that our data processing may impair your fundamental rights. We are especially aware of the risk of you being exposed to discrimination or identity fraud or suffering financial losses, loss of reputation or data confidentiality.

In the event that the decisions we need to make are dependent on our being able to process sensitive personal data or information about criminal offences you may have committed, we will undertake an analysis of the consequences of the data processing for the protection of your privacy. The consequence analysis will be undertaken before we begin processing your personal data.

### 1.2 Data protection Contact person – contact information

The company is responsible for the data and responsible for ensuring that your personal data is processed in accordance with the law.

The company has designated a contact person in charge of data protection, whose job it is to ensure that rules and procedures in relation to the processing of personal data are complied with on a daily basis.

If you have any questions regarding the processing of personal data in the company, you can contact:

Contact person: CFO Jimmi Madsen, (alternatively HR Coordinator Helle Nielsen)

Telephone no.: +45 6321 2010, (+45 6321 2007)

Email: im@cjc.dk, (hn@cjc.dk)

#### 2. Processing of personal data in the recruitment process

We process your data in connection with a recruitment process, in relation to collaborative partners, including in connection with personality tests and in our regular contact with you.

#### 2.1 Types of personal data

In connection with recruitment we will process personal information about you that may cover:

Name

- Contact information
- Portrait photo
- Salary level
- Education level
- Professional experience
- Personality test/vocational test

The information is stored either physically locked up in the HR department or in the IT system. The HR Cloud has limited access. A data processing agreement has been signed with the HR Cloud.

#### 2.2 The reason for processing personal data

We collect and store your data in connection with staff recruitment for up to six months. If you have submitted your application, CV and exam certificates via the HR Cloud, you will receive an email after six months with the option to update your CV. If you do not update it, your information will be automatically deleted.

If you have submitted a written application in person, this will be stored in a file in a locked cabinet in the HR department. We review these regularly and all applications older than six months are shredded.

If we wish to use your personal data for another purpose than that originally intended, we will inform you of the new purpose and ask for your consent before we start processing your data. If we have another legal basis for processing the information a second time, we will inform you of this.

#### 2.3 Scope of data

Before we process your personal data, we will look into whether it is possible for us to minimise the amount of data we need about you.

We will only collect, process and store the personal data that is necessary for us to achieve our intended purpose.

#### 2.4 Checks

As our HR department is dependent on your data being correct and up to date, we kindly ask that you inform us of any relevant changes to your data. You can notify us of your changes by contacting the above-mentioned HR coordinator, Helle Nielsen.

In order to ensure the quality of your data, we have determined a number of internal rules and set out procedures for checking and updating your personal data.

#### 3. Security

In order to protect you against unauthorised access to your personal data, we use either IT solutions or locked filing cabinets that automatically ensure that data is only accessible to relevant employees. We also have embedded protection against an unlimited number of people having access to data.

In addition, we have set out a number of internal rules on information security, which contain instructions and precautionary measures to protect your data from being destroyed, getting lost or altered, against unauthorised publication and against unauthorised users gaining access to or knowledge of it.

## 4. Forwarding of data

As a link in our recruitment procedure, it may be necessary for us to forward personal information to third parties, for example in connection with personality testing and obtaining references from previous employers, acceptance from the applicant permitting.

The forwarding of personal information must be objectively justified and also necessary for the fulfilment of a legitimate interest for you or for the company. Forwarding for purposes that are incompatible with the purposes underlying the company's processing is forbidden.

Regardless of whether we forward your personal data to collaborative partners that are based in countries inside or outside the EU, we ensure that their level of personal data protection matches the requirements we have set out in this policy in accordance with applicable legislation. This includes requirements placed on the processing of data, on information security and compliance with the rights which you have.

#### 5. Rights

#### 5.1 Right of access

On request to the HR department, you can find out which data and what category of personal information we process on you, as well as what the reason for processing it is. You can also find out how long we store your personal data for and who it is that receives the data about you, to the extent that we forward data in Denmark and to parties inside and outside the EU.

#### 5.2 Right to objection

You can at all times raise an objection to the HR department processing your personal information and thereby withdraw your consent to your data being processed.

You must be aware however that any withdrawal of consent can be contrary to the company's primary interests, and in such a case a withdrawal would have consequences for any future employment.

#### 5.3 Right of rectification

If you believe that the personal data we process on you is inaccurate or misleading, then you must contact the HR department and inform them of what the inaccuracies consist of and how they can be corrected.

#### 5.4 Right of deletion

We will store your personal data for up to six months.

In some cases however we will be obligated to delete your personal data earlier than this. This applies if for example you withdraw your consent or if you feel that your data is no longer necessary in relation to the purposes for which we obtained it.

When you submit a request to have your personal data corrected or deleted, we will check whether the conditions have been fulfilled and if so, implement the changes or deletion as quickly as possible.

You can also contact the HR department if you believe that your personal data has been processed in breach of legislation or other legal commitments.

Approved at the executive board meeting on 14 March 2018

Stig Due CEO

Jens Fich

**Technical Director** 

Jimmi Madsen

CFO

Ulrich Ritsing

Sales and Marketing Director