

Privacy Policy for Job Applicants

Data Controller

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1) Introduction

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

The Policy is formulated and made available to comply with the EU General Data Protection Regulation (“GDPR”) and its rules on the duty to inform.

2) Personal Data We Collect About You

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

Address, application, CV, email address, name, publicly available and relevant information from social media, national ID number (CPR), references from former employers, phone number, educational documents, date of birth.

We do not process special categories of data as defined in GDPR Article 9(1).

As a rule, we 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.

If we need to collect and process additional personal data beyond what is listed above, we will inform you at the time of collection.

3) Purpose of Processing Your Personal Data

The personal data we collect about you is processed for the following purposes:

- a) To process job applications and recruit suitable candidates.
- b) To collect, process, and store personal data as required by applicable legislation, including accounting and bookkeeping requirements.

4) Legal Basis for Processing Your Personal Data

We only process your personal data when we have a lawful basis to do so under the GDPR. Depending on the specific circumstances, the processing of personal data is carried out on the following legal grounds:

- a) The processing is necessary to comply with applicable law, cf. GDPR Article 6(1)(c), and/or to fulfil employment law obligations in legislation or collective agreements, cf. Section 12(1) of the Danish Data Protection Act.
- b) The processing is necessary to pursue a legitimate interest, where your interests or fundamental rights and freedoms requiring the protection of personal data do not override this interest, cf. GDPR Article 6(1)(f) and Section 12(2) of the Danish Data Protection Act.
- c) The processing is necessary for the performance or conclusion of a contract to which you are a party, cf. GDPR Article 6(1)(b).
- d) The processing is necessary to take steps at your request prior to entering a contract, cf. GDPR Article 6(1)(b).

5) Disclosure and Transfer of Your Personal Data

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

6) Deletion and Retention of Personal Data

We ensure that personal data is deleted when it is no longer relevant for the purposes described above. We always retain personal data for the period that applicable legislation requires us to do so, including for documenting compliance with accounting and bookkeeping regulations.

If you are hired, your personal data related to the application will be transferred to our personnel administration system. If you are not hired, your personal data will, as a general rule and in accordance with Danish law, be deleted after no later than 6 months. If there are specific employment-related reasons, personal data may continue to be processed for such specific purposes despite the above. This may include, for example, retaining applications for a longer period if we find it necessary to later demonstrate that there was no unlawful discrimination in the selection process. 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 drops out of the recruitment process.

If you have any questions regarding the retention and processing of your personal data, you are welcome to contact us at the email address listed in the last section of this Policy.

7) Your Rights

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

- **Right of Access:** You have the right to request access to the personal data we process about you, including the purposes of the processing and whether we disclose the personal data to others.
- **Right to Rectification:** You have the right to have incorrect personal data about you corrected.
- **Right to Erasure:** In certain cases, you have the right to have some of your personal data deleted.
- **Right to Restriction of Processing:** In certain cases, you have the right to restrict the processing of your personal data so that we only store it for a certain period.
- **Right to Object:** In certain cases, you have the right to object to our processing of your personal data for reasons relating to your situation.
- **Right Not to Be Subject to Automated Decision-Making:** You have the right not to be subject to an automated decision without human involvement unless the decision is necessary for your employment with us, is authorized by law, or is based on your explicit consent.
- **Right to Withdraw Consent:** If we have obtained your consent for part of our processing of your personal data, you have the right to withdraw your consent at any time. If you choose to withdraw your consent, it does not affect the legality of the processing based on the consent before its withdrawal.
- **Right to Data Portability:** In certain cases, you have the right to data portability for the personal data you have provided to us.
- **Right to Lodge a Complaint:** You can always file a complaint with the Danish Data Protection Agency.

There may be conditions or limitations to these rights. Thus, it is not certain that, for example, you have the right to data portability in each situation - this depends on the specific circumstances of the processing activities.

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

8) Changes to the Policy

We reserve the right to update and change this Policy. If we change the Policy, we will update the date and version at the top of the document.

9) Contact

For questions or comments regarding the Policy, or to exercise one or more of your rights, please contact:

Email: at@vana.dk