

NORDEA PRIVACY POLICY FOR APPLICANTS

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Introduction

Nordea is fully committed to protecting your individual rights and keeping your personal data safe. In this Privacy Policy we describe the collection, usage, storage and sharing practices of personal data as part of the recruitment process. Nordea Bank Abp is the controller of the personal data that you submit as part of the recruitment process. A list of the Nordea controllers can be found on [this link](#). You can use the contact information below for any questions regarding your privacy.

Because Nordea recruits across multiple countries, the information below may not be relevant for all countries where we recruit. We will indicate below where this is the case.

The Privacy Policy covers the following areas:

1. How we use your personal data
2. The personal data we collect
3. The lawful basis for our processing
4. Who we may share your personal data with
5. How long we keep your personal data for
6. Contact information
7. Your privacy rights

1 How we use your personal data

When applying for a position at Nordea, we process your personal data to assess your suitability for the role you have applied for and to manage the recruitment process.

If you have created a candidate profile and consented to being matched for new and open positions, we will process your personal data to match your competencies and experience with the recruitment needs of Nordea, including our subsidiaries.

In the countries where Nordea runs the Recommendation Program, Nordea employees can recommend candidates for open positions in Nordea. If you have been recommended by a referrer for a role in Nordea, we process your personal data as part of the Recommendation Program to assess your suitability for a role, if you choose to be part of the program and create a candidate profile.

If you choose to subscribe to e-mail notifications about new or open positions, or other career-related topics in Nordea, we will process your personal data to manage your subscription.

2 The personal data we collect

Personal data is in most cases collected directly from you. As part of the recruitment process, Nordea also collects personal data about you from third parties.

The categories of personal data we collect include:

- Identification information: for example, name, date of birth, and national identification number
- Contact information: for example, home address, email address, and phone number
- Recruitment data: for example, references, CV, application, interview and assessment data, and vetting and verification data
- Special categories of data: criminal convictions and offences
- Security clearance results, where applicable

Personal data collected from you:

Personal data is collected directly from you when you submit your application or subscribe to a subscription service. We also collect additional information directly from you during the recruitment process, for example academic records, work permit status, licenses, training certificates and other information that you choose to provide during interviews.

Personal data collected from third parties:

We may also collect information from third parties, for example from referees provided by you or by a referrer that recommends you as a candidate for a Nordea position, as part of our Recommendation Program. If you are applying for a position at Nordea via a recruiting agency, the agency may also provide Nordea with information about you. If you perform online assessments as part of the recruitment process, the company where you are performing the tests may also provide Nordea with information about you.

Nordea also performs background checks and will in connection to that collect information from various sources depending on the checks that are required for the position you have applied for. Examples of background checks are identity check and check of external engagements. In some countries, where it is required/allowed, we may also perform for example credit checks, drug tests and criminal records checks/security clearance. We will inform you to what extent it applies to you prior to performing the required background checks.

3 The lawful basis for our processing

Performance of a contract

As regards applications for specific positions, the lawful basis for our processing is performance of a contract, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

Consent

When you have created a profile for the purpose of job matching with new and open positions in Nordea, the lawful basis is your consent. If you have chosen to receive email notifications about career related topics and/or new and open positions in Nordea, the lawful basis is also your consent.

For some background checks and depending on the jurisdiction where you have applied for a position, we may ask for your consent.

Legal obligation

We may process your personal data to comply with legal obligations to which we are subject, for example when we are required to perform criminal records check or to verify work permits.

Legitimate interest

Nordea also has a legitimate interest to process personal data in the recruitment process. For example, we have assessed that we have a legitimate interest to process your personal data if you are being recommended as a candidate by a referrer as part of our Recommendation Program.

We also have a legitimate interest to process your personal data when carrying out our obligations in the field of employment. For example, we may use personal data to defend against discrimination claims connected to a recruitment.

4 Who we may share your personal data with

To provide and facilitate the recruitment process, we may share your information with:

- Nordea Bank group companies, only if it is needed for the recruitment process.
- Suppliers whom we have entered into an agreement with and who are processing personal data on behalf of Nordea. This can be suppliers of recruitment systems, IT development, maintenance, hosting and support. These parties may not use the personal data for any other purpose than for providing the service agreed with us.
- External parties that we cooperate with, for example with suppliers providing online assessments and drug tests.

5 How long we keep your personal data for

Applications for specific positions are kept for 2.5 years after the recruitment process has ended and the applicant is not hired. The applications are stored in order to safeguard against discrimination claims connected to a recruitment.

Your profile will be stored for 2.5 years after your last access, after which it will be automatically deleted unless you choose to renew your profile. We will send an e-mail reminder to you before 2.5 years have passed. You can also choose to delete your profile at any time by logging into the recruitment application.

For e-mail notifications of new and open positions, and other career related topics in Nordea, the personal data you submit is kept until you choose to unsubscribe from the service. Where you have provided your consent, you may at any time choose to withdraw it by contacting us (Talent Acquisition talentacquisition@nordea.com).

If you are hired, the information that is required and necessary for your employment will be stored and the rest will be deleted.

6 Contact information

If you have any questions or concerns regarding our handling of your personal data, you can always contact People Direct at peopledirect@nordea.com.

The Nordea Group has also appointed a Data Protection Officer that you can contact by sending an email to dataprotectionoffice@nordea.com or by sending a letter to:

Sweden: Nordea, Group Data Protection Office, M200, 105 71 Stockholm.

Norway: Nordea, Group Data Protection Office, PO Box 1166 Sentrum, 0107 Oslo.

Finland: Nordea, Group Data Protection Office, Tietosuojavastaava, Satamaradankatu 5, FI-00020.

Denmark: Nordea, Group Data Protection Office, Grønlandsvej 10, 2300, Copenhagen

Poland: Nordea Bank Abp Spółka Akcyjna Oddział w Polsce, Group Data Protection Office, Aleja Edwarda Rydza Śmigłego 20, 93-281 Łódź

You can also lodge a complaint or contact the Data Protection Authority in your country.

7 Your privacy rights

As an individual, you have certain rights regarding your own personal data. For more information on your rights, please see “Your Privacy Rights” on [this link](#).