

# **Privacy Policy for job applicants**

**December 2024**

**Nordea**

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. The legal entity engaging in the employment relationship with the individual 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. What personal data we collect
3. What is the lawful basis for the processing of your personal data
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 and how to assert them

## **1 How we use your personal data**

When applying for a position at Nordea, we process your personal data in order 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 have chosen to be part of the program and created 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 What 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, if legally permissible.

**The categories of personal data we collect include:**

- Identification information: for example, name, 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, background check and verification data
- Special categories of data: criminal convictions and offences, where applicable and if legally permissible
- 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. For certain positions, we may request you, only based on your consent, to be tested by means of personality and aptitude assessments to establish your capacity to perform the work of the open job role.

**Personal data collected from third parties:**

We may also collect information from third parties, for example from individuals that you provided as references or from a Nordea employee 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 providing 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 checks and checks 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 this applies to you prior to performing the required background checks.

### **3 What is the lawful basis for the processing of your personal data**

#### **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 in order to perform a contract or to take steps at your request, prior to 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 for our processing 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 for performing such checks.

#### **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 background checks or to verify work permits.

#### **Legitimate interest**

Nordea 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 to obtain a credit report if allowed by law, or if you are being recommended as a candidate by a recommending person as part of our Recommendation Program.

We may also use personal data to defend against discrimination claims connected to a recruitment.

If you are a former employee of Nordea, it may be necessary to process personal data from your previous employment with Nordea in order to assess your eligibility to be rehired.

## 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, 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, background checks and drug tests.

## 5 How long we keep your personal data for

We only retain personal data for as long as it is necessary in order to fulfill the purpose for which it was collected, to comply with legal requirements or to safeguard Nordea against discrimination claims or other claims connected to a recruitment.

Your generic job profile (if you have not submitted an additional job application) 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 (Recruitment Administration [recruitment.administration@nordea.com](mailto:recruitment.administration@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

The Nordea Group has appointed a Data Protection Officer that you can contact by sending an email to [dataprotectionoffice@nordea.com](mailto: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, Grønjordsvej 10, 2300, Copenhagen

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

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

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

## 7 Your privacy rights and how to assert them

You as a data subject have the following rights in respect of personal data we hold about you:

a) **Request access to your personal data**

You have a right to access the personal data we are keeping about you. In many cases this information is already available to you in your Nordea career portal. Your right to access may, however, be restricted by legislation, protection of other persons' privacy related rights, or to protect Nordea's trade secrets or intellectual property rights.

b) **Request rectification of incorrect or incomplete data**

If your personal data is incorrect or incomplete, you are entitled to have it rectified, with the restrictions that follow from legislation.

c) **Request erasure**

You have the right to request erasure of your personal data in case:

- i. you withdraw your consent to the processing and the consent has been the lawful basis for processing
- ii. you object to the processing and there is no justified reason for continuing the processing
- iii. the processing is unlawful.

d) **Object to processing based on legitimate interest**

You can always object to the processing of personal data when the lawful basis for such processing is legitimate interest.

e) **Restriction of processing of personal data**

If you contest the accuracy of the personal data which we have registered about you or the lawfulness of processing, or if you have objected to the processing of the personal data in accordance with your right to object, you may request us to restrict the processing of the data to storage only. The processing will only be restricted to storage, until the correctness of the personal data can be established, or it can be checked whether our legitimate interests override your interests.

- i. if you are not entitled to erasure of the personal data which we have registered about you, you may instead request that we restrict the processing of the data to storage only.
- ii. if the processing of the personal data which we have registered about you is solely necessary to assert a legal claim, you may also demand that other processing of the data be restricted to storage.
- iii. we may process your personal data for other purposes if this is necessary to assert a legal claim or if you have granted your consent to this.

Your request to exercise your rights as listed above will be assessed given the circumstances in the individual case. Where Nordea has rectified, erased or restricted the processing of your personal data, Nordea will notify the recipients to whom the personal data have been disclosed, unless this it is impossible or requires disproportionate effort.

Please note that we may also retain and use your information as necessary to comply with legal obligations, resolve disputes, and enforce our agreements or exercise our rights.