

NORDEA PRIVACY POLICY FOR REFERENCE PROVIDERS

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Nordea

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1. Introduction

This Privacy Policy is intended for individuals providing references, to whom the following provisions apply. This Privacy Policy describes the collection, usage, storage and sharing practices of your personal data as a person providing references about a candidate to Nordea as part of the reference check process (i.e. the reference check process is a part of Nordea's recruitment process in this case a candidate has applied for a role at Nordea and you are providing a reference for the candidate). Nordea is fully committed to protecting your individual rights and keeping your personal data safe. The recruiting Nordea legal entity is the controller of your personal data processed as part of the reference check in the recruitment process. A list of the Nordea controllers can be found on [this link](#). You can use the contact information below in section 7 for any questions regarding your privacy.

The Privacy Policy covers the following areas (applicable to individuals providing references):

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

2. How we use your personal data

The candidate we are considering for an open position will enter your first and last name, contact information, name of your position you held at the time you worked together, the nature of your working relationship and the name of the employer where you were both employed into our digital reference check system. We process the above-mentioned data to be able to send a reference questionnaire to assess the candidate's suitability for the position.

3. What personal data we collect

The personal data is collected from the considered candidate and directly from you.

The categories of personal data we collect include:

Identification information: your first and last name, job position, name of the employer

Contact information: email address and phone number

Security data: IP address, identity verification method (such as: national digital ID, Facebook, LinkedIn)

Reference check data: We also collect reference check data which consist of your answers to the reference check questionnaire concerning the considered candidate.

Personal data collected:

The personal data about you originates from the candidate and from you when you fill out the reference check questionnaire or provide the answers to us in a reference interview. The verification data and IP address are collected to make sure that the person added as a reference is also the person answering the questionnaire.

4. What is the lawful basis to the processing of your personal data

Legitimate interest

Nordea relies on legitimate interest to process personal data in the reference check process. We have assessed that we have a legitimate interest to process your personal data to be able to perform a reference check on the considered candidate, and that our legitimate interest is not overridden by your interests or fundamental rights and freedoms.

5. Who we may share your personal data with

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

- Nordea Group companies

We share your personal data with our supplier RefApp when you fill out the questionnaire.

6. How long we keep your personal data for

Your personal data will be stored for 12 months after you provide your reference, either by submitting the data in the questionnaire or during the phone call, after this period it will be automatically deleted. You can also choose to delete your personal data by contacting us at recruitment.administration@nordea.com.

We may also retain your 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 recruitment.

7. Contact information

The Nordea Group has 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, 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.

8. Your privacy rights and how to assert them

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

a) Request access to your personal data

You have a right to access the personal data we are keeping about you. 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. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- ii. you withdraw your consent to the processing and the consent has been the lawful basis for processing
- iii. you object to the processing and there is no justified reason for continuing the processing
- iv. 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) Limitation of processing of personal data

If you contest the correctness of the personal data which we have registered about you or 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 these personal data. The processing will be restricted to storage only, until the correctness of the personal data can be established, or it can be checked whether our legitimate interests override your interests.

If you are entitled to erasure of the personal data which we have registered about you but the personal data is necessary for you to defend a legal claim, you may request that Nordea restricts the processing to storage only if you want to keep the data.

Even when processing of your personal data has been restricted as described above, Nordea may process your personal data in other ways if this is necessary to enforce a legal claim or you have given your consent.

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.