

# Danske Bank's Privacy Notice to Potential Employees

## Introduction

As a potential future employee in the Finland-based operations of Danske Bank A/S, we want to inform you of the bank's processing of your personal data and your rights. We process your data since it is our common interest to complete a fair and successful recruitment process. Further, personal data is necessary for us to potentially enter into an employment agreement with you.

This privacy notice sets out the basis for how legal entities and branches within Danske Bank Group (the "bank") look after your personal data and the privacy rights you are granted by law. We protect your data and privacy by taking all relevant measures in accordance with applicable legislation.

## Why do we register and use your personal data?

We register and use data about you to fulfil our legal requirements and potentially enter into an employment agreement with you. We also process your personal data e.g. when you have granted us consent to use your personal data for a specific purpose and it is necessary to pursue a legitimate interest of the bank. We will only do so if our interest clearly outweighs your interest in not having your personal data processed by us.

## What personal data do we process?

We process different kinds of personal data about you, e.g.:

- CV, application letter, aptitude tests, interview records and other application documents, credit reference, drug test result, salary request, previous work history and educational information. In certain recruitments, we may also order a security clearance.
- Name, gender and date of birth.
- Nationality, private address and other contact details.

## Our purposes and legal ground for processing your personal data

We process your personal data for the following purposes:

- Recruitment and non-executive searches. We have a legitimate interest to process application documents such as CV and application letter, credit reference, work history and educational information, and your consent to process aptitude tests, drug test and in certain recruitments also security clearance results in order for the recruitment process to be fair and successful and to comply with legal requirements. Further, our processing of such data is necessary in order to eventually enter into an employment agreement with you and/or to inform you about open positions in the future.

## Third parties and your personal data

### Personal data from third parties

We process personal data from third parties, for instance from:

- Recruitment and executive search companies, adaptive test providers, the Credit Agency and in certain cases the police. The personal data we are provided with are e.g. your name, contact details, CV, credit reference and other application documents in addition to the results of aptitude tests and potential security clearance. The personal data may be collected from your publicly available profiles on social media, e.g. LinkedIn, in case you have referred to those social media profiles in your CV or application.
- Former employers who you have provided as references. The personal data we are provided are e.g. assessments of your performances and personality.

### Third parties with whom we share your personal data

In some instances, we may share personal data with third parties inside or outside Danske Bank Group:

- Aptitude test providers in order to test your competencies and aptitude for open positions
- The police in case the recruitment requires a security clearance.

## Your rights

### Insight into your personal data

You can obtain insight into the personal data we process, where it comes from and what we use it for. You can obtain information about for how long we store your data and about who receives data about you, to the extent that we disclose data in Finland and abroad. Your right of access may, however, be restricted by legislation, protection of other persons' privacy and consideration for our business and practices. Our know-how, business secrets as well as internal assessments and material may also as such be exempt from the right of insight.

### Correction or erasure of data

If the data is incorrect, incomplete or irrelevant, you are entitled to have the data corrected or erased with the restrictions that follow from existing legislation and rights to process data. These rights are known as the "right to rectification", "right to erasure" or "right to be forgotten".

### Restriction of use

If you believe that the data we have processed about you is incorrect, or if you have objected to the use of the data, you may demand that we restrict the use of these data to storage. Use will only be restricted to storage until the correctness of the data can be established, or it can be checked whether our legitimate interests outweigh your interests.

If you are entitled to have the data we have registered about you erased, you may instead request us to restrict the use of these data to storage. If we need to use the data we have registered about you solely to assert a legal claim, you may also demand that other use of these data be restricted to storage.

### **Withdrawal of consent**

If we process personal data based on your consent, you can withdraw your consent to disclose data at any given time. However, this may prevent us from continuing the recruitment process with you. Please note also that we will continue to use your personal data if we have another legal ground for the processing, e.g. a legitimate interest as mentioned in the General Data Protection Regulation.

### **Data portability**

If we use data based on your consent or as a result of an agreement, and the data processing is automated, you have a right to receive the copy of the data you have provided in an electronic machine-readable format.

### **Erasure and retention of personal data**

We keep your data only for as long as it is needed for the purpose for which your data were processed. Thus, we will save your personal data during the recruitment process and up to a year from the ending date of the recruitment process. Our reason for the saving your personal data after the recruitment process is that you can be considered for other open positions if agreed with you.

### **Contact details and how can you complain**

You are always welcome to contact us, as data controller, if you have questions about your privacy rights and how we register and use personal data. You can contact our Data Protection Officer by email at [dpofunction@danskebank.com](mailto:dpofunction@danskebank.com).

If you are dissatisfied with how we register and use your personal data, and your dialogue with the Data Protection Officer has not led to a satisfactory outcome, you can contact our complaints handling unit: Danske Bank, HR Legal FI, Televisiokatu 1, 00240 Helsinki. You can also lodge a complaint with the Office of the Data Protection Ombudsman, P.O. Box 800, 00521 Helsinki; email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi).