

# Danske Invest Management A/S, Luxembourg Branch Privacy Notice for Potential Employees

Effective from 9 April 2025



## Introduction

We want to inform you, as potential future employee of Danske Bank Group (hereinafter – "The Group") "when, what and why" we process your personal data, as well as your rights to that data. We protect your data and privacy by taking all relevant measures in accordance with applicable legislation.

This privacy notice sets out the basis for how legal entities and branches within the Group look after your personal data and the privacy rights you are granted by law.



We process your personal data in the following situations:

- We include you in our recruitment database
- We assess you as a candidate
- We draft a contract (If relevant)
- It is our legal obligation to do so, e.g. anti-money-laundry legislation.

## What personal data do we process?

We process various kinds of personal data, including the following:

- CV, tests, interview records and other application documents, including previous professional experience and qualification, educational level and year of graduation, and positions of your interest in the Danske Bank Group;
- name, gender, date of birth;
- citizenship, private address and other contact details;
- information about your former employment in the Group, such as reasons and grounds of termination of your employment, termination date, warnings, assessments of your performances and personality, other information about you as a former employee.



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

We process your personal data for various reasons, such as fulfilling our legal and contractual obligations according to law, any applicable collective bargaining agreements and/or your employment agreement. These obligations include the following actions:

- recruitment, executive and non-executive searches, sending voluntary survey to gain feedback from you. We have a
  legitimate interest to process your personal data 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;
- In some cases, the Danske Bank Group requests your consent to processing your personal data. Before you give your consent, you will receive information about the specific processing activity so that it is clear to you what you give your consent to For example, the Group processes your email for job notifications based on your consent. You may withdraw your consent at any time and you will be informed of any consequences of such withdrawal.



## Third parties and your personal data

### Personal data collected from third parties

We may collect personal data from third parties for various purposes. These third parties can include the following parties:

- recruitment, executive and non-executive search companies. The personal data we are provided are e.g. your name, contact details, CV, feedback from test/assessments conducted by third parties and other application documents;
- from publicly accessible sources, such as LinkedIn, etc., in case you provide us a link during recruitment process. The personal data we are collecting is full name, email, work history, and other data included on you profile;
- former employers subject to the references provided by you. The personal data we are provided are e.g. assessments of your performances and personality.

## Personal data shared with third parties

In some instances, we may share personal data with third parties inside or outside the Group and such third parties may share personal data with each other:

- recruitment, executive and non-executive search companies may receive personal data about you, such as employment conditions, in order to complete the recruitment process.
- when we perform background checks on our finale candidates for critical positions covered by e.g. anti-money-laundry and anti-terrorism-financing
- third party service providers who have been appointed as data processors to perform functions and services on our behalf and are not authorised by us to use such data for any other purposes (e.g. providers of software for recruitment database, administration services and etc.)



## 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 Denmark 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 as such may also as such be exempt from the right of insight.

#### Correction or erasure of Danske Bank Group's 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 and the right to object

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 in your personal data not being processed.

If the Group is processing your personal data based on legitimate interest, you have a right to object to that processing. Please contact the Talent Acquisition team or HR Legal if you wish to exercise this right to object.

Danske Bank

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. Please note that we will continue to use your personal data if we have another legal ground for the processing, e.g. a legal or contractual obligation.

### Data portability

You have a right to receive a copy of the data you have provided in a structured, commonly used and machine -readable format if the processing of those data is based on your consent or in order to entering into a contract.

# 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 six months from the ending date of the recruitment process. Our reason for saving your personal data is because it may be used by the Group to defend against a legal claim.



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, e-mail: 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, Group HR Legal, Holmens Kanal 2-12, 1092 Copenhagen K. You can also lodge a complaint with the Danish Data Protection Agency: Datatilsynet, Borgergade 28, 1300 Copenhagen K, e-mail: dt@datatilsynet.dk