

JOB APPLICANT PRIVACY POLICY

Netgroup Engineering AB is committed to protecting and respecting your privacy. This privacy policy describes how we collect and use your personal data when you apply for a job or get in touch with us regarding a job application. It also describes the choices available to you regarding our use of your personal data.

Please read this privacy policy before submitting your application. By submitting your application, you accept this privacy policy and our processing of your personal data.

Netgroup is the responsible entity (controller) for the processing of your personal data as described herein. Please do not hesitate to reach out to gdpr@netgroup.se if you have any questions or comments regarding your privacy.

1 PERSONAL INFORMATION THAT WE PROCESS

During the recruitment process, we will collect and process personal data about you. Depending on the circumstances, such personal data may include the categories of data listed below. Please note that the examples listed under each category are not exhaustive.

- **Contact details**, such as your email address, telephone number and postal address.
- **Individual data**, such as your name, gender, date of birth, personal identification number or other identifier, marital status, preferred language, nationality, passport information, food preferences, hobbies.
- **Professional skills and application data**, such as skills and competencies, language capabilities, resume, cover letter, previous and relevant work experiences, other experiences, academic background, grades, transcripts, professional certifications, job preferences and type of employment sought, references, letter of recommendations and any other information you include in your application.
- **Interview and reference data**, such as notes taken during interviews and from references, assessments of capabilities, current and historic salary details together with salary and benefits expectations, and any other information you or your references provide us with.
- **Test data**, such as information and results from any tests you perform during the recruitment process, for example related to your personality, intelligence and skills.
- **Correspondence data**, such as personal information provided by email, regular mail or other means, letters of offer and acceptance of employment.

Other data. We may also collect and process any other relevant information you share with us about yourself in the course of your application. Please note that we receive any information you send to us.

Sensitive data. We will only collect sensitive personal data (such as racial or ethnic origin, political opinions, religion, health, or the like) if there is a clear reason for doing so. For example, if you have physical limitations or special needs that require us to make specific considerations during the recruitment process. We do this to enable our candidates to apply for jobs with us and to ensure that we comply with regulatory obligations placed upon us with regard to our hiring. Because email communications are not always secure, we encourage you to not include sensitive data in your emails to us.

2 HOW WE GATHER YOUR PERSONAL INFORMATION

Information you give to us. Most of the information Netgroup collects about you is received directly from you, for example from your application and during interviews. You can always choose not to provide us certain information. However, not providing requested personal data may affect or prevent us from evaluating your application or consider you as a candidate.

Information we collect about you. Netgroup may also collect personal data about you from third parties, such as professional recruiting firms, your references and prior employers. Sometimes we may also obtain personal data from publicly available sources, such as your profile on LinkedIn, Facebook and other publicly available information.

3 HOW YOUR INFORMATION WILL BE USED

Netgroup will process your personal data in a conventional and regular recruitment manner. For example, we may need to process your data to enter into a contract with you regarding the employment. This also includes taking steps prior to entering into a contract with you.

Netgroup also have a legitimate interest in processing your personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and choose between candidates.

Netgroup will process your personal data for the following purposes:

- **To manage all aspects of the recruitment process.** Your personal data will be used to manage your job application, to assess qualifications and evaluate performance in interviews and tests, determine eligibility for initial employment, including the verification of references, qualifications and performance.
- **To communicate with you.** Your personal data (e.g. your email and phone number) will be used to communicate with you before, during and after the recruitment process. For example, in order to schedule interviews and tests, provide you with feedback and inform you of other open positions at Netgroup.
- **To consider you for other positions.** We may use your personal data to consider you for other positions than the one you are applying for, or for potential future roles. If you

are not interested in any other positions, please reach out to us and let us know you wish to be excluded.

- **To comply with legal obligations and legal process.** We may need to process your personal data to ensure that we are complying with our legal obligations. For example, we need to check a successful applicant's eligibility to work in Sweden before employment starts. We may also need to process data your personal to respond to and defend us against legal claims.
- **To manage your employment with us.** In the event of your application resulting in the offer and your acceptance of a position at Netgroup, the data collected will become part of your employment record and will be used for employment purposes, in accordance with our employee privacy policy.

4 HOW WE SHARE YOUR INFORMATION

Netgroup may share your personal information with our employees and other trusted parties, to the extent required to manage the recruitment process:

- **Our employees.** Your information will be shared internally for the purposes of the recruitment process, and to manage our daily business operations. However, we will restrict access to those of our employees who need it to perform their jobs, such as individuals performing administrative functions, HR and any other members of staff involved in the recruitment process.
- **Service providers.** We may transfer or share your personal data with suppliers and subcontractors that supply services to us which require the processing of your personal data. For example, third party service providers may provide us with recruiting software systems or assist us in the recruiting process, including interviewing, administering tests and evaluating candidates. We may also engage legal and other professional advisers. Please note that our suppliers and subcontractors are not authorized to use or disclose your personal data except as necessary to perform services on our behalf, or to comply with legal requirements.
- **Legal purposes.** Sometimes legal purposes may require us to share information about you, for example if required by law, legal process or to respond to lawful requests from law enforcement agencies, regulatory agencies, and other public and government authorities.
- **Other parties.** We may also share your personal information where you ask or permit us to. For example, we may share necessary information about you with the references you have provided, to make any necessary reference checks.

5 WHERE WE PROCESS YOUR PERSONAL DATA

Netgroup always strives to process and store your data within the EU/EEA. However, your data may in certain situations be transferred to, and stored at, a destination outside of the EU/EEA territory.

Please note that privacy laws in countries outside of the EU/EEA may not be the same as, and in some cases may be less protective than, privacy laws in your country. Netgroup will however take all steps necessary to ensure that adequate safeguards (for example, EU standard Model Clauses and Privacy Shield) are in place to protect your personal information and to make sure it is treated securely.

6 HOW LONG WE KEEP YOUR PERSONAL DATA

Netgroup keeps your personal data only as long as necessary for the recruitment process. However, we may keep your personal data up to two years after the position has been filled. The reason for this is that we may need to show that the hiring process was non-discriminatory.

We may also keep and use your personal data for a limited period of time to consider you for potential future roles. If you are not interested in any other positions than the one you are applying for, please reach out to us and let us know you wish to be excluded. Your application will be saved for this purpose as long as you are considered an interesting candidate, but no longer than two years. However, we may contact you to ask if you want to review and update your application to continue to be included in our pool of potential candidates.

If your application has been successful and you are hired, the data collected will become part of your employment record and will be used for employment purposes, in accordance with our employee privacy policy.

7 YOUR RIGHTS

- **Right to object.** You have right to object to processing based on legitimate interest. This means we may no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests. You can always contact us for more information on the balance test that has been made.
- **Right to access and transfer your data.** You have the right to request a transcript of personal data processed by us, and additional information on how the data have been collected, processed, shared, etc. The first transcript may be requested free of charge. You may also be entitled to transfer your personal data to another controller.
- **Right to rectification.** You have the right to correct inaccurate or incomplete information about yourself.
- **Right to erasure.** You have the right to request that we delete personal data about you, for example if the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or if there is no legal basis for processing the data.

- **Right to restriction.** You are entitled to request that the processing of your personal data should be limited until inaccurate or incomplete information about you has been corrected, or until an objection from you has been handled.
- **Right to withdraw your consent.** You may at any time withdraw any consent you have given us. However, please note that it will not affect any processing that has already taken place.

Please note that legal rights or obligations (such as privacy and confidentiality legislation) may prevent us from disclosing or transfer all or part of your information, or from immediately deleting your information.

8 HOW TO CONTACT US

Netgroup is the responsible entity (controller) for the processing of your personal data as described above. We are subject to Swedish data protection legislation, including the General Data Protection Regulation (GDPR).

If you have any questions or comments on this privacy policy or about our use of your personal data, please contact us at gdpr@netgroup.se or you can contact us at +46 31-510400.

9 COMPLAINTS

You have the right to lodge a complaint to the Swedish Supervisory Authority, if you believe that we have not complied with our obligations regarding your personal data.