

Recruitment Privacy Notice

1 Introduction

This privacy notice describes how Struers ApS (Struers, we, us, our) collect and use personal data about you as part of the recruitment process, in accordance with data protection law, including the General Data Protection Regulation (GDPR).

2 Data controller

Struers is data controller. This means that we are responsible for deciding how we hold and use personal data about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

Our contact details are:

Struers ApS, Pederstrupvej 84, 2750 Ballerup, +45 44 600 800.

If you have any questions or requests related to this privacy notice, please contact HR@struers.dk.

3 Purposes of processing your data

3.1 Receipt of applications etc.

When we receive your application, we will read it and select the persons who we will call for an interview. The selection is based on your qualifications in relation to the specific position(s). You will be called for the interview by email, telephone or through the recruitment system you applied for the position in question.

As part of the recruitment process, we will receive and process the personal data that you have included in your application, CV and any other material that you may have forwarded along with your application. We may also ask you to send us additional information. The information obtained in this connection will include your name, contact details, ID documentation (such as passport or national ID card), profile picture as well as information about your previous employments, including information relating to work assignments, skills and performance, and information about your personal appearance and interpersonal skills. We will also obtain other information about you if we consider such information to be necessary for the assessment of your application, including e.g. information on residence permit.

3.2 Social media

If relevant, we will obtain available information published by you on social media, such as LinkedIn and Facebook.

3.3 References

If we wish to obtain information about you from your current or former employer using your references, we will first ask for your approval. Unless you are otherwise specifically notified by us, the information we obtain in that connection will include the following categories: Information about your previous employments, including information relating to work assignments, skills and performance, your personal appearance and interpersonal skills, and the reason for not being or no longer wanting to be employed by the employer in question.

If you list references in your application, we may contact such former employers without notifying you beforehand (unless we intend to obtain other information than the information mentioned above).

3.4 Use of personality and competency assessments

During the recruitment process relating to some positions, we may use a personality assessment and/or a competency assessment. Typically, the assessments are taken after our first interview with you. The purpose of the assessments is to identify your personal preferences and skills, forming a basis for a dialogue with you about your personal resources and conduct. The assessments will be part of the overall basis for selecting the right candidate for the position.

3.5 Criminal record

During the recruitment process, we may ask you to show your criminal record certificate. Whether a criminal record certificate is required depends on the position, including the responsibilities and powers involved. If we consider it to be relevant to the position for which you have applied, we will ask you to request a personal criminal record certificate.

3.6 Job interviews

If you progress in the recruitment process, we will conduct interviews where we will focus on your professional and personal skills as well as the challenges etc. of the job. We will write down some of the information disclosed during the interview(s). We only use the relevant information in the assessment of whether you should be offered a position.

3.7 Drafting of employment agreement

If we offer you a position, we will process the personal data necessary for staff administration purposes. In that case, you will receive further information on this.

4 The legal bases for the processing of your personal data

In the table below, you can see the legal bases for our processing of your personal data. The legal bases for each of the activities explained above are stated in the table.

Purpose	Legal basis
Receipt of applications etc. and conducting interviews	The legal basis for processing the personal data is article 6(1)(f) of the GDPR as we pursue the legitimate interest in the processing of the personal data being necessary for our assessment of you as a person and your skills in relation to the contents of the position.
Social media	The legal basis for processing the personal data published by you on social media is article 6(1)(f) of the GDPR as we pursue the legitimate interest in the processing of the personal data being necessary for our assessment of you as a person in relation to the contents of the position.
References	Article 6(1)(f) of the GDPR as we pursue the legitimate interest in the processing of the personal data being necessary for our assessment of your qualifications to perform a specific job function.
Use of personality and competency assessments	The legal basis for processing the personal data is article 6(1)(f) of the GDPR as we pursue the legitimate interest in the processing of the personal data being necessary for our assessment of your personal skills based on the assessments.
Criminal records	<p>The legal basis for our processing of your general personal data is article 6(1)(f) of the GDPR as we pursue our legitimate interest in checking your criminal record in relation to the position you have applied for.</p> <p>If the criminal record contains information about criminal offences, the legal basis for our processing is section 8(3) or 8(5) of the Danish Data Protection Act.</p>
Drafting of employment agreement	The legal basis for processing the general personal data stated in the application documents may also be 6(1)(b) of the GDPR as it may be necessary to process the personal data in question for the purpose of drafting an employment agreement, if relevant.

5 Recipients of personal data

We may share your personal data with our recruitment partners, if necessary, in relation to the recruitment process.

Further, we may share your personal data with our group companies in the context of providing administrative support and performing group functions (such as group management and financial matters).

Your personal data will also be made available to our data processors, for example our IT system providers etc.

6 Transfer of personal data to third countries

We transfer your personal data to our group companies, processors, and/or other suppliers or vendors located in third countries.

This includes the United States. Unless the country in question has been approved by the European Commission as having a sufficient level of protection (including companies located in the United States that are covered by the [EU-US Data Privacy Framework](#)), the legal basis for such transfer is the Commission Decision of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council.

If you want additional information about our transfer of personal data outside the EU and EEA, including the appropriate or suitable safeguards governing the transfers, you may make a request for such additional information by contacting us (see Section 2).

7 Data retention

If your [application is rejected](#), we will generally delete the information that we have processed about you during the recruitment process when it is completed. This will typically coincide with the time when we enter into an employment agreement with the selected candidate and generally no more than 6 months after the date when you were informed of the rejection.

[If we employ you](#), the personal data that we have processed during the recruitment process will, if relevant, be stored in your personnel file in accordance with the applicable retention periods. In that case, you will be further notified of the processing of your personal data.

8 Your rights

Under certain circumstances, by law you have the right to:

- **Withdraw consent:** In the limited circumstances where you have given your consent for our processing of your personal data, you have the right to withdraw such consent at any time. You can withdraw your consent by contacting us (see contact details above). If you withdraw your consent, the withdrawal will not affect the lawfulness of processing that has already been carried out based on your consent.
- **Request access:** You have the right to have confirmed whether collection or processing of your personal data has taken place, and, if so, you have the right to request a copy of your personal data in a digital format.
- **Request rectification:** You have the right to request that we correct any inaccurate personal data, and that we complete incomplete personal data.

- **Request erasure:** In certain circumstances, you have the right to request that we erase personal data concerning you; for example, if it is no longer necessary for the purposes in which it was originally collected.
- **Request the restriction of processing:** In certain circumstances, you have the right to request that we restrict the processing of your personal data, for example, if you believe that the personal data is not accurate or lawfully processed.
- **Object to the processing:** In certain circumstances, you have the right to request that we stop processing your personal data.
- **Request transfer:** In certain circumstances, you have the right to receive the personal data you have provided us with in a structured, commonly used, machine readable format, and the right to have the data transmitted to another entity, where technically feasible.

You can read more about your rights in the Danish Data Protection Agency's guidelines on data subjects' rights, which is available at www.datatilsynet.dk.

Please contact us if you wish to exercise any of your rights. The relevant contact details are stated above (see Section 2).

9 Complaint to a supervisory authority

If you want to lodge a complaint with a supervisory authority about our processing of your personal data, you can do so by contacting the Danish Data Protection Agency (see further information on the Agency's website, www.datatilsynet.dk).

10 Mandatory information

Under the data protection rules, you are entitled to be informed of whether the provision of personal data is a statutory requirement, or a requirement necessary to enter into a contract, and of whether you are obligated to provide the personal data and of the possible consequences of failure to provide such data.

It should be noted in that respect that under the Danish Health Information Act (*helbredsoplysningsloven*), an employee must state of its own motion or at the employer's request to that effect whether the employee knows that the employee suffers from an illness or shows symptoms of an illness which will significantly affect the employee's ability to carry out the work in question.

Further, as a potential future employee, you are subject to the general duty of transfer which means that you must not knowingly withhold information that may be relevant to your opportunity for being employed.

Moreover, it should be noted that if you are offered a position, we will use certain personal data about you to draft your employment agreement, including your name and address; see the provisions of the Danish Employment Contracts Act.

If you do not wish to provide the information that you are required to provide under the provisions of the Danish Health Information Act and/or according to your duty of transfer or the information necessary for drafting an employment agreement, or any other information which we are required to collect from you by law, we will be unable to offer you a position.