

## **Privacy policy for applicants**

The company within the Nordea Group that you are applying for a position at is the controller and responsible for your personal data. Nordea Bank Abp is the controller for Job Agent and e-mail notifications. A list of Nordea controllers can be found here:

[Nordea controllers](#)

Irrespective of which Nordea company you are applying for a position at, you can use the contact information below for any questions regarding your privacy.

## **How we use your personal data**

When applying for a position at Nordea, we process your personal data to assess your competencies and experience against the requirements of the position you are applying for and to manage the recruitment process.

If you have submitted a so-called open application to our candidate database, we will process your personal data to match your competencies and experience with the recruitment needs of Nordea, including our subsidiaries.

If you choose to subscribe to our Job Agent with e-mail notifications about new open positions, we will process your personal data to manage your subscription.

## **The personal data we collect**

Personal data (for example contact information, CV and other information that you submit), is collected directly from you when you submit your application or subscribe to our Job Agent, and if you provide additional information during the recruitment process, for example in interviews. We may also collect information from third parties, for example information from referees provided by you.

Nordea also performs background checks and will in that connection collect information from you and various sources depending on the checks that are required for the position you have applied for. Examples of background checks and personal data collected are identity check, academic records check, work permit status and check of external engagements. In some countries and for some positions we may also perform for example credit checks, drug tests, criminal records check, and personality/ability tests. We will inform you prior to performing background checks.

## **The lawful basis for our processing**

As regards applications for specific positions, the lawful basis for our processing is our legitimate interest, meaning that we need to process your personal data to assess you as a candidate for the position you have applied for. We have assessed that Nordea has a legitimate interest to process your personal data for recruitment purposes. For some background checks, for example for personality tests, we may ask for your consent.

For open applications to our candidate database and for our Job Agent, the lawful basis for our processing is your consent. You may at any time withdraw your consent by contacting us (Talent Acquisition [talentacquisition@nordea.com](mailto:talentacquisition@nordea.com)), after which we will delete your application.

We may also process your personal data to comply with legal obligations to which we are subject and for the purposes of carrying out our obligations in the field of employment, for example if we are facing discrimination claims connected to a recruitment.

## How we may share your personal data

Your personal data will be shared within the Nordea Group only if needed for the recruitment process. We may also share your personal data with external parties that we cooperate with, for example suppliers providing personality tests. The system we are using for the recruitment process is provided by HR Manager AS in Norway, which is a processor to Nordea.

## How long we keep your personal data for

Applications for specific positions are kept for two years after the recruitment process has ended.

Open applications to our candidate database are kept for six months, after which they will automatically be deleted, unless you choose to renew your application. We will send you an e-mail reminder before the six months have passed and ask if you would like to renew your application.

You may request an open application to be deleted at any time.

For e-mail notifications of new positions via our Job Agent, the personal data you submit is kept until you choose to unsubscribe from the service.

## Contact information

If you have any questions or concerns regarding our handling of your personal data, you can always contact People Direct at [peopledirect@nordea.com](mailto:peopledirect@nordea.com)

Also, the Nordea Group has appointed a Data Protection Officer that you can contact by sending a mail to: [dataprotectionoffice@nordea.com](mailto: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, Strandgade 3, PO Box 850, 0900 Copenhagen C.

You can also lodge a complaint or contact the Data Protection Authority.

## Your privacy rights

You as a data subject have rights in respect of personal data we hold on you. You have the following rights:

1. request access to your personal data. You have a right to access the personal data we are keeping about you. In many cases this information is already present to you in your online services from us. Your right to access may, however, be restricted by legislation, protection of other persons' privacy and consideration for the Nordea Group's business concept and business practices. The Nordea Group's know-how, business secrets as well as internal assessments and material may restrict your right of access.
2. request correction of incorrect or incomplete data. If the data are incorrect or incomplete, you are entitled to have the data rectified, with the restrictions that follow from legislation.
3. request erasure. You have the right request erasure of your data in case:
  - you withdraw your consent to the processing and there is no other legitimate reason for processing,
  - you object to the processing and there is no justified reason for continuing the processing,
  - you object to processing for direct marketing,
  - processing is unlawful or
  - when processing personal data on minors, if the data was collected in connection with the provision of information society services.
4. limitation of processing of personal data. If you contest the correctness of the data which we have registered about you or lawfulness of processing, or if you have objected to the processing of the data in accordance with your right to object, you may request us to restrict the processing of these data to only storage. The processing will only be restricted to storage, until the correctness of the data can be established, or it can be checked whether our legitimate interests override your interests.

If you are not entitled to erasure of the data which we have registered about you, you may instead request that we restrict the processing of these data to only storage. If the processing of the data which we have registered about you is solely necessary to assert a legal claim, you may also demand that other processing of these data be restricted to storage. We may process your data for other purposes if this is necessary to assert a legal claim or if you have granted your consent to this.

1. object to processing based on our legitimate interest. You can always object to the processing of personal data about you for direct marketing and profiling in connection to such marketing.
2. data portability. You have a right to receive personal data that you have provided to us in a machine-readable format. This right applies to personal data processed only by automated means and on the basis consent or of fulfilling a contract. Where secure and technically feasible the data can also be transmitted to another data controller by us.

Your request to exercise your rights as listed above will be assessed given the circumstances in the individual case. Please note that we may also retain and use your information as necessary to comply with legal obligations, resolve disputes, and enforce our agreements.