

## PRIVACY POLICY FOR CANDIDATES

At Surikat, safeguarding your privacy is a top priority when seeking out new talent. We make every effort to ensure that your personal information is thoroughly protected to the best of our ability.

In this privacy policy, we want to inform you as a potential candidate or as a candidate when you have applied for a job with us, how we process your personal data. Below is a summary of the purposes for which we process your personal data. Further down in this privacy policy we explain in detail what personal data we store, why we need to process it and the legal basis for our processing. We also explain what rights you have in relation to our processing of your personal data.

**In summary**, we process personal data (such as information from your CV, cover letter and interviews) for the following main purposes:

- to communicate with you as a potential candidate or when you have applied for a job;
- to administer and appraise your job application; and
- to match your profile to future job openings.

### Your rights

In short you have the following rights:

- ✓ [The right to lodge a complaint with a supervisory authority,](#)
- ✓ [The right of access,](#)
- ✓ [The right to object,](#)
- ✓ [The right to erasure,](#)
- ✓ [The right to rectification, and](#)
- ✓ [The right to restriction of processing.](#)

*If you have any questions regarding our processing of your personal data, or if you wish to exercise any of your rights under data protection legislation, please contact us via our e-mail address [gdpr@surikat.se](mailto:gdpr@surikat.se) or give us a call on +46 31 722 88 00.*

## **Who is responsible for processing your personal data?**

Surikat AB, registration number 556633-0840, with phone number +46 31 722 88 00 and e-mail address [gdpr@surikat.se](mailto:gdpr@surikat.se) is responsible for the processing of your personal data (the controller).

## **From where do we collect your personal data?**

When you apply for a job through our web page you provide us information about yourself, such as your name, contact details and information found in your CV and cover letter. We will also collect your personal data from other sources as described below:

- If you have been in contact with our recruitment company, we receive your personal data from such company. The personal data that we receive is the information that you decided to include in your job application to the recruitment company.
- If we contact your references, we process personal data about you that your references provide to us.

## **Are you required to provide personal data to us?**

You are not required to provide your personal data to us. However, if you do not provide us with any personal data about yourself, we will not be able to administer or appraise your application and profile.

Below you can read more about how we process your personal data when you interact with us in different situations.

## **Who can gain access to your personal data and why?**

Your personal data is primarily processed by us and we will not share it with anyone. Our IT-supplier will store your personal data in their role as data processor.

*If you want to know more about who we share your personal data with, please feel free to contact us. You will find our contact details in the beginning of this privacy policy.*

## **Do we transfer your personal data outside the EU/EEA?**

Your personal data will in most cases be processed outside of the EU/EEA if the suppliers we use are based outside of the EU/EEA. Your personal data will be transferred outside the EU/EEA to our IT-suppliers that in some cases are based outside of the EU/EEA, e.g. the US. However, we and our suppliers have tried to protect your personal data and reduce the risk of it being transferred outside the EU/EEA by only storing your personal data on the IT-supplier's servers within the EU/EEA, when possible.

In the above situations our suppliers rely on Standard Contractual Clauses (article 46.2 c) module 1 and module 2, and supplementary security measures for the transfer of personal

data outside of the EU/EEA. The use of Standard Contractual Clauses is an effort to provide a safe transfer of your personal data. You can find the Standard Contractual Clauses [here](#).

If you want to know more about where your personal data will be processed, please feel free to [contact us](#).

## **What rights do you have in relation to our processing of your personal data?**

You have certain rights that you can exercise to affect how we process your personal data. You can read a more detailed description about what those rights are below.

*If you want to know more about your rights or if you want to exercise any of your rights, please [contact us](#) and we will help you.*

### **Right to lodge a complaint with a supervisory authority (Article 77 GDPR)**

You have the right to lodge a complaint with a supervisory authority.

The supervisory authority in Sweden is the [Swedish Authority for Privacy Protection](#) (Integritetsskyddsmyndigheten, the IMY)

***In detail:** Your right to complain exists without prejudice to any other administrative or judicial remedy. You have the right to lodge a complaint with a supervisory authority, in particular, in the EU/EEA member state of your habitual residence, place of work or place where the alleged infringement of applicable data protection laws has allegedly occurred.*

*The supervisory authority has an obligation of informing you on the progress and the outcome of the complaint, including the possibility of a judicial remedy.*

### **Right of access (Article 15 GDPR)**

You have the right to obtain confirmation as to whether we are processing personal data concerning you or not. You can make a request by [contacting us](#). If we process your personal data, you also have a right to obtain a copy of the personal data processed by us as well as information about our processing of your personal data.

***In detail.** The information we provide includes the following:*

- *the purposes of the processing,*
- *the categories of personal data concerned,*
- *the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations,*
- *where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period,*
- *the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing,*
- *the right to lodge a complaint with a supervisory authority,*

- if the personal data are not collected from you, we provide you with available information about the source of the personal data;
- the existence of automated decision-making, including profiling, referred to in Articles 22.1 and 22.4 GDPR and, in those cases, meaningful information about the logic involved, as well as the significance and the predicted consequences of such processing; and
- where your personal data are transferred to a third country or to an international organisation, you have the right to information regarding the appropriate safeguards, pursuant to Article 46 GDPR, put in place for the transfer.

For any further copies of the personal data undergoing processing requested by you, we may charge a reasonable fee based on administrative costs. If you have made the request by electronic means the information will be provided to you in a commonly used electronic form, unless otherwise requested by you.

Your right to obtain a copy referred to above shall not adversely affect the rights and freedoms of others.

### **Right to object (Article 21 GDPR)**

You have the right to object to our processing of your personal data at any time.

***In detail:*** Your right to object applies as follows:

- You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on Article 6.1 f GDPR, including profiling based on that provision. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- In the context of the use of information society services, and regardless of Directive 2002/58/EC (ePrivacy Directive, or ePD), you may exercise your right to object by automated means using technical specifications.

### **Right to erasure (“the right to be forgotten”) (Article 17 GDPR)**

You have the right to ask us to erase your personal data.

***In detail:*** We have the obligation to erase your personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you object to the processing pursuant to Article 21.1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21.2 GDPR;
- the personal data have been unlawfully processed; or
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law that applies to us.

We will notify any erasure of personal data carried out in accordance with your rights stated above to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to [contact us](#).

Please note that our obligation to erase and inform according to above shall not apply to the extent processing is necessary according to the following reasons:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law which applies to us; or
- for the establishment, exercise or defence of legal claims.

### **Right to rectification of processing (Article 16 GDPR)**

You have the right to obtain, without undue delay, the rectification of inaccurate personal data concerning you.

*In detail:* Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

We will communicate any rectification of personal data to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to [contact us](#).

### **Right to restriction of processing (Article 18 GDPR)**

You have the right to obtain from us restriction of the processing of your personal data.

*In detail:* Your right applies if:

- the accuracy of the personal data is contested by you, during a period enabling us to verify the accuracy of the personal data,
- you have objected to processing pursuant to Article 21.1 GDPR pending the verification whether our legitimate grounds override yours,
- the processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of their use, or
- you need the personal data for the establishment, exercise or defence of legal claims even though we no longer need the personal data for the purposes of the processing.

Where the processing has been restricted according to above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

We will notify each recipient to whom the personal data has been provided about any restriction of processing according to above, if this do not occur to be impossible or entails a disproportionate effort. If you want more information about these recipients, you are welcome to [contact us](#).

## Detailed description on how we process your personal data

The below charts describe in detail why we process your personal data, what personal data we process, the legal basis for our processing and how long we process your personal data.

Before recruitment process: To communicate with you as a potential candidate or when you have applied for a job		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>To communicate with you before a recruitment process</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details</li> <li>Information from your CV or cover letter and other documents attached to your application (such as information on your current employer and education)</li> </ul>	Legitimate interest (Article 6.1.f GDPR)  <i>Our legitimate interest to process your personal data to communicate with you</i>
<p><b>Retention:</b> We will store your personal data for as long as we have an ongoing correspondence with you. If a recruitment process is initiated, we will process your personal data for longer as described below.</p>		

During recruitment process: To administer and appraise your job application		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>To contact you regarding your job application, for example in order to move forward in our recruitment process</li> <li>To evaluate your job application and conduct interviews to be able to make sure that we find the person that is most suitable for the job</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details</li> <li>Information from your resume or cover letter and other documents attached to your application (such as information on your current employer and education) and personal data collected from interviews with you</li> </ul>	Legitimate interest (Article 6.1.f GDPR)  <i>Our legitimate interest to process your personal data to evaluate your job application, conduct interviews and otherwise communicate with you regarding the application</i>
<p><b>Retention:</b> We will store your personal data for the duration of the recruitment process. We will store your personal data for a longer period for other purposes described below but will in any case stop storing your personal data if you withdraw your job application.</p>		

After recruitment process: To match your profile to future job openings		
What processing we perform	What personal data we process	Our legal basis for the processing
<ul style="list-style-type: none"> <li>To match your profile to future job positions</li> <li>To contact you regarding your job</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details</li> </ul>	Legitimate interest (Article 6.1.f GDPR)  <i>Our legitimate interest to match your</i>

<p>application and similar job positions</p> <ul style="list-style-type: none"> <li>● To store your personal data after the recruitment process in order to be able to defend us against future discrimination claims, i.e. in order to be able to carry evidence in the matter</li> </ul>	<ul style="list-style-type: none"> <li>● Information on which jobs you have showed interest in and other information provided to us in your profile</li> <li>● Information you have provided during the recruitment process and personal data which is necessary to be able to carry evidence in the matter</li> </ul>	<p><i>profile with positions similar to the one you applied for and to be able to defend Surikat against future discrimination claims</i></p>
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**Retention:** If you're not offered the job you applied for, we will continue to process your personal data if you choose to receive updates of similar jobs at Surikat. In that case, your personal data will be processed as described above ("before recruitment process").

We will store your personal data for two years and two months after a completed recruitment process, in accordance with the regulated time to start proceedings under the Swedish Anti-Discrimination Act.

We always try to conduct our recruitment processes in the best possible way for everyone involved. Should you have any complaints about our recruitment process, we process your personal data longer than the above stated time period, however, no longer than until your complaint has been settled.

**Balancing of interests assessments when processing personal data based on the legal basis "legitimate interests"**

As we state above, for some purposes, we process your personal data based upon our "legitimate interest". We think you also want us to process your personal data so that we could consider you for one of our popular job openings. By carrying out a balancing of interests assessment concerning our processing of your personal data, we have concluded that our legitimate interest for the processing outweighs any interest you may have of us not processing your personal data.

*If you want more information in relation to our balancing of interests assessments, please do not hesitate to contact us. You will find our contact details in the beginning of this privacy policy.*