

# Privacy Policy for Applicants

## 1. PROTECTION OF YOUR PRIVACY

As part of the recruitment procedure - both based on a job posting and an unsolicited application - VP SECURITIES A/S ("VP"), receives and processes personal data on you, and VP has therefore adopted this privacy policy, which explains how your personal data are processed and describes your rights as a data subject.

## 2. DATA RESPONSIBILITY

VP is controller and therefore responsible for your personal data being processed in accordance with applicable data protection legislation.

VP's contact details are the following:

Company name:	VP SECURITIES A/S
Address:	Weidekampsgade 14, DK-2300 Copenhagen S
Telephone no.:	4358 8888
E-mail:	people@vp.dk

## 3. PURPOSE OF THE PROCESSING OF YOUR PERSONAL DATA

The purpose of receiving and processing your personal data as part of a recruitment procedure is to assess your qualifications and your experience in relation to the position's requirements.

We process the following data on you which we have received from you or your reference persons or retrieved via social media such as LinkedIn or other relevant Internet searches:

- Name, address, e-mail and telephone number
- Data on qualifications and competencies, i.e. professional experience, education, diplomas, seminars, certifications, language skills, etc.
- Photo (if provided by you)

- Data on you on publicly available social media are neither noted nor stored
- Evaluation notes and notes from interviews
- Reference persons and their contact details and notes from the interviews
- Personality tests
- Any relevant health data
- Passport
- Criminal record
- Student ID card
- European Union Consolidated Financial Sanctions List

We ask you to delete your civil registration number on grade transcripts etc. as we do not need this information. We also ask that you leave out any sensitive personal data\* from your application, unless special reasons speak in favour thereof.

\* = data on racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health or sexual orientation.

#### **4. LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

VP processes your personal data for the purpose of concluding a contract of employment with you as you have provided the data to VP yourself to obtain employment (Article 6 (1), paragraph b of the Data Protection Regulation).

Processing of personality tests etc. and publicly available information on you, for instance from social media like LinkedIn, takes place due to VP's legitimate interest in assessing whether your profile matches VP and the position (Article 6 (1), paragraph f of the Data Protection Regulation and section 12 of the Data Protection Act).

Processing of references from former or present employers is based on your consent (Article 6 (1), paragraph a and Article 9 (2), paragraph a of the Data Protection Regulation concerning sensitive data and section 12 of the Data Protection Act).

Processing of your criminal record is based on VP's legitimate interest (Article 6 (1), paragraph f of the Data Protection Regulation and section 12 of the Data Protection Act). The criminal record will be retrieved only if you are offered employment.

Processing of a copy of your passport and any residence and work permit is based on VP's legal obligation to ensure that you have a valid residence and work permit if you are offered employment (Article 6 (1), paragraph c of the Data Protection Regulation). A copy of your passport and any residence and work permit will be retrieved only if you are offered employment.

Processing of your student ID card is based on VP's legal obligation to ensure that you have a valid student ID card if you are offered employment (Article 6 (1), paragraph c of the Data Protection Regulation). The student ID card will be retrieved only if you are offered employment as a student assistant.

Processing of sensitive health data is authorised by Article 9 (2), paragraph b of the Data Protection Regulation and section 12 of the Data Protection Act as VP is entitled to know whether you suffer from or has suffered from an illness, or whether you have had symptoms of an illness which may be of material importance to the specific position.

## **5. RECIPIENTS OF PERSONAL DATA**

As part of the recruitment procedure, VP may in some situations disclose personal data to others. This could for instance be in connection with the filling out of a personality test and the obtaining of references.

VP uses the following processors in connection with the recruitment procedure:

- Test tools
  - SHL Group Denmark
- Recruitment system
  - HR Manager Talent Tech

## **6. TRANSFER TO THIRD COUNTRIES**

In connection with tests, VP transfers personal data to processors situated in the USA and India. The transfer takes place in accordance with a standard contract approved by the European Commission, which ensures that the protection level is maintained. For more information on the European Commission's standard contracts, see the Commission's website under "Law".

## **7. STORAGE PERIOD**

If your application is rejected, VP will store your application and personal data for a period as long as VP has a purpose for storing the data; however, maximum four months after receipt of your application. The result of your test will be deleted three months after it has been carried out. Unsolicited applications will be deleted four months after receipt.

In case of an unsolicited application which does not match a position at VP, or applications from candidates who cannot be taken into consideration for an interview, the data will be deleted as quickly as possible.

## **8. YOUR RIGHTS**

If you wish to exercise the rights below, please contact VP using the contact details listed above.

VP will process and respond to your inquiry as quickly as possible and within one month of having received your inquiry, unless the complexity and the scope of the inquiry makes it impossible for us to reply within a month. In that case, the response deadline may be up to three months in total.

You have the following rights:

- **Right to have insight:** You are entitled to have access to your personal data processed by VP and a number of additional data. However, the right of access may not infringe other persons' rights and rights of freedom.
- **Right of rectification:** You are entitled to have incorrect personal data rectified.
- **Right of deletion:** You are entitled to have personal data deleted before our general deletion takes place.
- **Right of limitation:** In certain situations, you are entitled to have your personal data limited. If you are entitled to limited processing, VP may only process your personal data - except for storage - with your consent or for the purpose of establishing, exercising or defending a legal claim or to protect a person or important public interests.
- **Right of objection:** You are entitled to object to VP's processing of your personal data.
- **Right of withdrawal of consent:** If VP's processing is based on your consent, you are at any time entitled to withdraw your consent wholly or partly to VP's processing of your personal data. The withdrawal of your consent will not affect the lawfulness of the processing made by VP until the withdrawal of your consent. Withdrawal of your consent will thus only be valid from that point in time.

For more information on your rights, see the Danish Data Protection Agency's guidelines describing the data subject's rights on [www.datatilsynet.dk](http://www.datatilsynet.dk).

## 9. COMPLAINTS

If you wish to complain about VP's processing of your personal data, you may complain to the Danish Data Protection Agency, which has the following contact details:

Address: Carl Jacobsens vej 35, DK-2500 Valby  
E-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)  
Telephone no.: 3319 3200  
Website: [www.datatilsynet.dk](http://www.datatilsynet.dk)

## 10. DATE AND UPDATE

This Privacy Policy came into force on 25 May 2018 and was updated on 4 May 2021. The Privacy Policy will be updated on a regular basis.