

NORDEA PRIVACY POLICY FOR APPLICANTS

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Contents

1	Introduction	3
2	How we use your personal data	4
3	What personal data we collect	4
4	What is the lawful basis for collecting your personal data	5
5	Who we share your personal data with	6
6	How long we keep your personal data for	6
7	Contact information	6
8	Your privacy rights and how to assert them	7

1 Introduction

Nordea is fully committed to protecting your individual rights and keeping your personal data safe. In this Privacy Policy we describe the collection, usage, storage and sharing practices of personal data as part of the recruitment process. Nordea Bank Abp is the controller of the personal data that you submit as part of the recruitment process. A list of the Nordea controllers can be found on [this link](#). You can use the contact information below for any questions regarding your privacy.

Because Nordea recruits across multiple countries, the information below may not be relevant for all countries where we recruit. We will indicate below where this is the case.

The Privacy Policy covers the following areas:

1. How we use your personal data
2. What personal data we collect
3. What is the lawful basis for the processing of your personal data
4. Who we may share your personal data with
5. How long we keep your personal data for
6. Contact information
7. Your privacy rights and how to assert them

2 How we use your personal data

When applying for a position at Nordea, we process your personal data to assess your suitability for the role you have applied for and to manage the recruitment process.

If you have created a candidate profile and consented to being matched for new and open positions, we will process your personal data to match your competencies and experience with the recruitment needs of Nordea, including our subsidiaries.

In the countries where Nordea runs the Recommendation Program, Nordea employees can recommend candidates for open positions in Nordea. If you have been recommended by a referrer for a role in Nordea, we process your personal data as part of the Recommendation Program to assess your suitability for a role, if you have chosen to be part of the program and created a candidate profile.

If you choose to subscribe to e-mail notifications about new or open positions, or other career-related topics in Nordea, we will process your personal data to manage your subscription.

3 What personal data we collect

Personal data is in most cases collected directly from you. As part of the recruitment process, Nordea also collects personal data about you from third parties, if legally permissible.

The categories of personal data we collect include:

- Identification information: for example, name, date of birth and national identification number
- Contact information: for example, home address, email address and phone number
- Recruitment data: for example, references, CV, application, interview and assessment data, background check and verification data
- Special categories of data: criminal convictions and offences, where applicable and if legally permissible
- Security clearance results, where applicable

Personal data collected from you:

Personal data is collected directly from you when you submit your application or subscribe to a subscription service. We also collect additional information directly from you during the recruitment process, for example academic records, work permit status, licenses, training certificates and other information that you choose to provide during interviews. For certain positions, we may request you, only based on your consent, to be tested by means of personality and aptitude assessments to establish your capacity to perform the work of the open job role.

Personal data collected from third parties:

We may also collect information from third parties, for example from individuals that you provided as references or from a Nordea employee that recommends you as a candidate for a Nordea position as part of our Recommendation Program.

If you are applying for a position at Nordea via a recruiting agency, the agency may also provide Nordea with information about you. If you perform online assessments as part of the recruitment process, the company where you are performing the tests may also provide Nordea with information about you.

Nordea also performs background checks and will in connection to that collect information from various sources depending on the checks that are required for the position you have applied for. Examples of background checks are identity check and check of external engagements. In some countries, where it is required/allowed, we may also perform for example credit checks, drug tests and criminal records checks/security clearance. We will inform you to what extent it applies to you prior to performing the required background checks.

4 What is the lawful basis for collecting your personal data

Performance of a contract

As regards applications for specific positions, the lawful basis for our processing is performance of a contract, which relates to processing necessary in order to perform a contract or to take steps at your request, prior to entering a contract.

Consent

When you have created a profile for the purpose of job matching with new and open positions in Nordea, the lawful basis for our processing is your consent. If you have chosen to receive email notifications about career related topics and/or new and open positions in Nordea, the lawful basis is also your consent.

For some background checks and depending on the jurisdiction where you have applied for a position, we may ask for your consent for doing such checks.

Legal obligation

We may process your personal data to comply with legal obligations to which we are subject, for example when we are required to perform criminal records check or to verify work permits.

Legitimate interest

Nordea also has a legitimate interest to process personal data in the recruitment process. For example, we have assessed that we have a legitimate interest to process your personal data to obtain a credit report if allowed by law, if you are being recommended as a candidate by a recommending person as part of our Recommendation Program.

We also have a legitimate interest to process your personal data when carrying out our obligations in the field of employment. For example, we may use personal data to defend against discrimination claims connected to a recruitment.

If you are a former employee of Nordea, it may be necessary to process personal data from your previous employment with Nordea in order to assess your eligibility to be rehired.

5 Who we may share your personal data with

To provide and facilitate the recruitment process, we may share your information with:

- Nordea Bank group companies, only if it is needed for the recruitment process.
- Suppliers whom we have entered into an agreement with and who are processing personal data on behalf of Nordea. This can be suppliers of recruitment systems, IT development, maintenance, hosting and support. These parties may not use the personal data for any other purpose than for providing the service agreed with us.
- External parties that we cooperate with, for example with suppliers providing online assessments, background checks and drug tests.

6 How long we keep your personal data for

Applications for specific positions are kept for 2.5 years after the recruitment process has ended and the applicant is not hired. The applications are stored in order to safeguard Nordea against discrimination claims or other claims connected to a recruitment.

Your profile will be stored for 2.5 years after your last access, after which it will be automatically deleted unless you choose to renew your profile. We will send an e-mail reminder to you before 2.5 years have passed. You can also choose to delete your profile at any time by logging into the recruitment application.

For e-mail notifications of new and open positions, and other career related topics in Nordea, the personal data you submit is kept until you choose to unsubscribe from the service. Where you have provided your consent, you may at any time choose to withdraw it by contacting us (Talent Acquisition talentacquisition@nordea.com).

If you are hired, the information that is required and necessary for your employment will be stored and the rest will be deleted.

7 Contact information

The Nordea Group has also appointed a Data Protection Officer that you can contact by sending an email to 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, Grønjordsvej 10, 2300, Copenhagen

Poland: Nordea Bank Abp Spółka Akcyjna Oddział w Polsce, Group Data Protection Office, Aleja Edwarda Rydza Śmigłego 20, 93-281 Łódź

Estonia: Nordea, Group Data Protection Office, Tietosuojavastaava, Satamaradankatu 5, FI-00020.

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

8 Your privacy rights and how to assert them

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

a) 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 available to you in your Nordea online services. Your right to access may, however, be restricted by legislation, protection of other persons' privacy related rights, or to protect Nordea's trade secrets or intellectual property rights.

b) Request rectification of incorrect or incomplete data

If the data is incorrect or incomplete, you are entitled to have the data rectified, with the restrictions that follow from legislation.

c) Request erasure

You have the right to request erasure of your data in case:

- i. you withdraw your consent to the processing and there is no other legitimate reason for processing
- ii. you object to the processing and there is no justified reason for continuing the processing
- iii. processing is unlawful.

d) Object to processing based on legitimate interest

You can always object to the processing of personal data when lawful basis for such processing is legitimate interest.

e) Limitation of processing of personal data

If you contest the accuracy of the data which we have registered about you or the 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 the data to storage only. 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.

- i. 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 the data to storage only.

- ii. 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 the data be restricted to storage.
- iii. 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.

Your request to exercise your rights as listed above will be assessed given the circumstances in the individual case. Where Nordea has rectified, erased or restricted the processing of your personal data, Nordea will notify the recipients to whom the personal data have been disclosed, unless this is impossible or requires disproportionate effort.

Please note that we may also retain and use your information as necessary to comply with legal obligations, resolve disputes, and enforce our agreements or exercise our rights.