



Privacy policy for candidates

1 Introduction

Here you can read about how Laigaard & Partners ApS (hereinafter "we," "us," and "our") collect, process, and store your personal data as part of our operations and the activities described in section 3 below.

Responsible handling of personal data is crucial to our business goals and reputation. Therefore, this privacy policy describes how and why we collect personal data about you, how the data is used, when it is deleted, and how you can, among other things, access your personal data.

2 **Data controller**

Laigaard & Partners ApS is the data controller for the processing activities described in this privacy policy unless otherwise stated in the activities in section 0 below.

If you have any questions about this privacy policy or our processing of your personal data as described in section 3 below, please contact us at:

Laigaard & Partners ApS

VAT number: 20892595

Store Kongensgade 40H, 3rd floor

1264 Copenhagen K

Phone: +45 33 91 18 00

Email: gdpr@laigaard-partners.com

3 How do we process personal data as part of our activities?

We collect and process personal data in different situations, and the purpose of the collection, what the personal data is used for and when it is deleted can vary. The individual activities where Laigaard & Partners ApS (as data controller) can collect personal data about you are therefore described separately below.

3.1 When you register as a candidate in Laigaard & Partners' candidate database

When you register as a candidate in our candidate database, we process, store, and disclose personal data about you to perform our Executive Search activities and your personal data may be used for the purposes specified below.

3.1.1 What personal data is processed and where does it come from?

You provide the personal data to us in the data form, and as a starting point, you decide which personal data you want to provide. In addition, we expect to collect the following personal data about you:

- Contact information, including name, email, phone number, and address
- Personal data included in your resumé, including possibly a photo, current position, profession and employer, experience, skills, certificates, diplomas, and other documents you may have uploaded, as well as information about work effort, education, and training
- Results of personality and skills tests that you will be asked to complete as part of a recruitment process, as well as notes from interviews
- References from previous employers, whom you have given consent for us to contact
- Publicly available information, e.g. on social media platforms, including skills, achievements, hobbies, and image
- In connection with employment for certain trusted positions (e.g. as CFO/Accounting Manager), it may be relevant to obtain data from a third party about your financial circumstances (e.g., from a credit information agency). If relevant to the position you are applying for, we will obtain your consent beforehand
- In connection with a second in-depth interview during a specific recruitment process, we ask
 you to obtain a criminal record certificate
- Any health data, if the position you have applied for requires it or if there are specific health details that have an impact on your work and are relevant for us or your prospective employer to know
- Other personal data you provide in connection with a recruitment process.

3.1.2 Why do we process the personal data?

We process your personal data for the following purposes:

- To create and store your candidate profile in our candidate database for recruitment purposes
- Our evaluation of whether you are the right candidate for one or more of our recruiting clients

3.1.3 What is the legal basis for the processing?

Our processing of general personal data is based on the following legal bases:

Consent: When you register as a candidate in our candidate database, we obtain your consent to process the data entered in the data form, including consent to perform personality and skills tests and process any personal data collected during interviews. We also obtain your consent to obtain references from previous/current employers, educational institutions, and other relevant parties as part of a recruitment process. If employment is for a certain trusted position, such as a CFO, it may be relevant to obtain information from a third party about your financial circumstances (e.g., from a credit information agency), for which we will obtain your consent beforehand. This legal basis is found in Article 6(1)(a) of the GDPR. You can withdraw your consent at any time by contacting us (see section 2 above).

Although our current recruitment techniques involve human decision-making during the process, we use profiling techniques such as personality tests or skills assessments as part of our recruitment activities. In the future, we may potentially use fully automated technologies such as expert systems or machine learning to complete the candidate

selection process from start to finish, where relevant and in accordance with local legislation and requirements. Where applicable, we will inform you and obtain your consent, where required, before engaging in such activities.

• <u>Legitimate Interest</u>: Pursuit of our legitimate interests that outweigh your fundamental rights and freedoms. We may collect personal data about you from publicly available sources, personal knowledge, and networking. This legal basis is found in Article 6(1)(f) of the GDPR. The legitimate interests are our legitimate interests in making you as attractive as possible and providing you with the best conditions for employment with one of our recruiting clients. **You can object to this processing at any time** by contacting us (see section 2 above).

Our processing of personal data relating to criminal offenses and unlawful conduct is based on the following legal basis:

 <u>Consent</u>: We obtain your consent and collect your criminal record certificate if it becomes relevant to the specific position. This legal basis is found in Section 8(3) of the Data Protection Act. <u>You can withdraw your consent at any time</u> by contacting us (see section 2 above).

Our processing of sensitive personal data is based on the following legal basis:

• <u>Consent</u>: If we need to collect and process any sensitive personal data, we obtain your explicit consent. This legal basis is found in Article 9(1)(a) of the GDPR. <u>You can withdraw your consent at any time</u> by contacting us (see section 2 above).

3.1.4 Who do we share your personal data with?

Your personal data may be disclosed to our recruiting clients (your potential new employer) in connection with a recruitment process if your profile is relevant to the specific position and for the purpose of employment. Your personal data is shared, among other things, in presentation materials tailored to each recruiting client, depending on the position and role that the recruiting client needs to fill.

3.1.5 For how long do we store your personal data?

Your personal data is stored and, as a starting point, deleted one year after registration in our candidate database unless you consent to us retaining your personal data for an additional year.

If we have requested you to obtain a criminal record certificate, it will be deleted immediately after we have concluded the specific recruitment process.

4 Disclosure of personal data to data processors and other controllers

Data processors

In connection with the purposes above, we may share your personal data with third parties, including IT suppliers, recruitment agencies, and other subcontractors. Our subcontractors process your personal data solely under our direct instructions and in accordance with the data processing agreement. Therefore, our subcontractors do not process the personal data for their own purposes but solely as data processors on our behalf.

Disclosures

In certain situations, it is necessary for us to disclose your personal data to third parties other than recruiting clients. Under specific circumstances and in accordance with the law, it may be necessary to disclose your personal data to the following recipients:

- Lawyers and auditors
- Courts and other public authorities
- Potential buyers of the company

Our company structure may change as we develop, for example, through the complete or partial sale of Laigaard & Partners ApS. In the event of the transfer of assets containing personal data, we disclose your personal data based on our legitimate interest in transferring parts of our assets and making commercial changes (Article 6(1)(f) of the GDPR).

When transferring personal data to recipients in countries outside the EU/EEA ("international data transfers"), the transfer is based on the EU Commission's standard contractual clauses or relevant adequacy decisions made by the EU Commission (Chapter 5 of the GDPR).

5 Your rights

You are entitled to exercise your rights under the data protection legislation at any time:

- Access: You have the right to obtain access to and receive a copy of the personal data we
 process about you and several additional data. We respond within a reasonable time and no
 later than one month after receiving your request.
- Right to object: In certain cases, you have the right to object to our collection and processing
 of your personal data.
- Rectification: You have the right to have personal data about you rectified.
- Erasure: In special circumstances, you have the right to have personal data about you
 erased before the time for our ordinary erasure.
- Restriction: In certain cases, you have the right to restriction of processing of your personal data. If the right applies, we may then only process the data except for retention with your consent or for the establishment, exercise, or defence of legal claims or for the protection of the rights of another person or for reasons of important public interest.
- Data portability: In certain cases, you have the right to receive a copy of the personal data you have provided in a structured commonly used and machine-readable format.

If you wish to exercise your rights, please contact us at gdpr@laigaard-partners.com. Your request will be processed in accordance with the legislation in force at the given time. To the extent necessary, we will contact you and ask for additional information required to handle your request correctly.

If you would like to learn more about your rights, please visit the website of the Danish Data Protection Agency, www.datatilsynet.dk.

6 Making a complaint

If you would like to make a complaint about our processing of your personal data, you are welcome to contact us. Our contact details are listed in Section 2 above.

You also have a right to file a complaint to the Danish Data Protection Agency, Carl Jacobsens Vej 35, DK-2500 Valby. A complaint may be filed by email to dt@datatilsynet.dk or through the website of the Danish Data Protection Agency www.datatilsynet.dk.

7 Updating our privacy policy

Laigaard & Partners may update this privacy policy on an ongoing basis when this is necessary to provide a fair description of our processing of personal data.

In the event of material changes to our processing of your personal data already in our possession, you will be notified directly of the update (e.g. by email) or we will announce the update on our website.

This privacy policy was last updated in June 2023.