

Recruitment Privacy Notice for the FCG Group

Thank you for your application to the FCG Group¹! FCG Holding Sverige AB ("FCG") is the data controller of your personal data and we care for your privacy and always strive for a high level of data protection. In this Privacy Notice, you will find information on how FCG collects, uses and retains your personal data in connection with your application and the recruitment process. This Privacy Notice also include information on how you can exercise your rights in accordance with the GDPR.

Category of data subjects

What data we collect depends on how you interact with us and, based on the main ways to interact with us, in this Privacy Notice the data subject's included are:

- The job applicant
- The applicants previous employer/other relevant person acting as reference ("Reference")

There will be explicit mentions in this Privacy Notice when refereeing to the processing of personal data of the Reference.

General information

When you apply for a job (including both open and unadvertised positions) at FCG Group your personal data will be processed in Talent Recruiter (by Talentech, you can read more about their processing of personal data in their [Privacy Policy](#) on their website). FCG is the controller of the personal data you submit in your application through the recruitment system and Talentech is the processor and handles your personal data on our behalf.

During the application process, you might be invited to take part in tests to assess your match with the job description. Those tests are provided and performed by our testing partner Alva Labs. For the conduct of the tests, Alva Labs is the controller of your personal data, and the process thereof is determined by Alva Labs and described in their [Privacy Policy](#) on their website). Regardless FCG will be the controller for how we process your test result in the application process.

During the application process, we might also collect references which are performed by our reference partner Talentwise (via their system RefApp, you can read more about their processing of personal data in their [Privacy Policy](#)). For the collection of references FCG uses Talentwise as a processor and will only collect and process your personal data on our behalf.

¹ The FCG Group consist of FCG Holding Sverige AB and [all its subsidiaries](#).

Type of personal data collected

FCG will collect and use information about your application, which may include, among other things, your contact details, national identification/social security number, information on previous employers and references, your CV and/or personal letter. FCG may also require you to provide qualifications or test results. If your application proceeds to an offer of employment, FCG may require additional information from you, for example references from third parties and background checks, we will inform you accordingly.

With regards to the Reference FCG will collect personal data about your name, verifications of your information, IP-address and the answers you provide regarding the applicant.

How is personal data collected?

Personal data will either be collected directly from you or by third parties such as Alva labs and/or your references. The personal data will be collected when conducting tests, background checks and/or collecting references.

With regards to the Reference the personal data will be collected directly from you or from the applicant via RefApp.

How will the personal data be used?

All personal data collected will be used for the purpose of recruitment, to communicate with you in light thereof and to consider your profile and qualifications for a role at FCG. It may also be used to check that there are no obstacles for you to undertake the role. Your personal data may be shared within the FCG Group for the purpose of the recruitment and eventually the fulfilment of the position in question. Where third parties (including processors) are required to assist FCG for the purposes described, FCG will ensure that any third party has appropriate security measures in place to protect your personal data in line with FCG's own policies.

We may also use your personal data to keep you posted on upcoming positions within the FCG Group that may be of interest to you. You have the possibility to withdraw your consent from our career database whenever you wish by contacting us (or Talentech) using the contact details provided in this Privacy Notice.

With regards to the Reference the personal data are processed for the purpose of recruitment of the applicant, and to consider the applicants profile and qualifications for a role at FCG.

How long will FCG retain the personal data for?

If your application is successful, the personal data collected as part of the recruitment process will be transferred to your personnel file and processed in accordance with our Employee Privacy Notice, which will be handed to you together with your employment agreement.

Should your application not lead to an employment, your personal data may be processed by FCG for a period after the date of your application and for the purposes of considering you for potential future opportunities within the FCG Group if consent is given. The maximum retention period for personal data in connection to you applying to a position at FCG is 24 months after the given consent and/or application to the position. You have the right to withdraw your consent at any time by sending an e-mail to dataprotection@fcg.se.

In all cases, your personal data from the recruitment process will be kept for an additional period for the explicit purpose of handling possible legal claims and to be able to answer questions regarding the recruitment from you.

With regards to the Reference the personal data will be stored at RefApp for 24 months after the initial processing.

Where is your personal data stored?

Your personal data will be stored within the European Economic Area ("EEA") and is secured with a sufficient level of technical standards and practices. If your personal data are transferred to a third country, the transfer will be carried out in compliance with applicable laws and always with the appropriate safeguards in place to ensure the protection of your personal data.

When we transfer your personal data outside of the EEA, we base the transfer on standard contractual clauses ("SCC"). Data subjects have the right to request the specific SCC related to the transfer of personal data outside of the EEA.

Please contact dataprotection@fcg.se for any questions of copy requests of the SCC.

What legal grounds do we use to process your personal data?

FCG's legal grounds for processing your personal data are:

- *Legitimate interest* - when performing the recruitment process and finding a suitable candidate for fulfilment of the current and future roles in the FCG Group.
- *Legal obligation* - when handling possible legal claims with regards to the recruitments process. and to be able to answer questions regarding the recruitment from you.
- *Consent* - when being added to our career database and potential contacts regarding upcoming positions within the FCG Group that may be of interest for you.

Your rights

We understand that you may at times need further information from us regarding your personal data or that you may wish to update or correct the personal data you have provided us with. In light hereof, you have the following rights through the GDPR:

- **Right to access your personal data:** you have the right to obtain confirmation from us as to whether personal data concerning you are being processed, and, where that is the case, access to the personal data.

- **Right to rectification of personal data:** if you find that personal data that we process about you is inaccurate, you have the right to have us correct such personal data.
- **Right to erasure of personal data (right to be forgotten):** under certain circumstances, such as if your personal data has been unlawfully processed, is no longer needed for the purposes it was collected, or if you have withdrawn your consent (if the processing of your personal data is based on consent), you have the right to request and obtain erasure of your personal data from us.
- **Right to restriction of processing:** under certain circumstances, such as if you question the accuracy of your personal data or you have objected to our legitimate purpose to process your personal data, you have the right to request that we limit the processing of your personal data until a solution has been found. By "limited" is meant that the data is flagged so that it in future may only be processed for certain limited purposes.
- **Right to object to processing:** under certain circumstances, such as if you question the accuracy of your personal data, you have the right to object, on grounds relating to your particular situation, to such processing.
- **Right to data portability:** if your personal data is processed by automated means based on your consent or for the fulfilment of our contractual relationship, you have the right to request that we provide you with your with personal data on a machine-readable format for transmission to another data controller.
- **Right to lodge a complaint with a supervisory authority:** you have the right to lodge a complaint regarding our processing of your personal data with your national supervisory authority.

Questions and exercising your rights.

To exercise your rights, please contact FCG: dataprotection@fcg.se

Should you have any questions on this Privacy Notice or how we process personal data, you may also contact us via the same address as above.

FCG reserves the right to modify this Recruitment Privacy Notice and will post any changes to the Recruitment Privacy Notice on our website.