

# Recruitment Privacy Notice for the Advisense Group

Thank you for your application to a company in the Advisense Group<sup>1</sup>! FCG Holding AB (under the name change to Advisense Group AB) is the data controller for the processing of your personal data. 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 Advisense collects, uses, and retains your personal data in connection with your application and the recruitment process. This Privacy Notice also includes information on how you can exercise your rights in accordance with the GDPR.

## Data controller

**Advisense Sweden AB** ('Advisense', 'we', or 'us') is the data controller for the processing of personal data in the context of the recruitment process for all companies in the Advisense Group.

## Category of Data Subjects

In this Privacy Notice the data subjects included are:

- ☐ The applicant for a position at a company in the Advisense Group (the '**applicant**'), and
- ☐ The applicant's reference person (the '**Reference Person**').

This Privacy Notice includes information on the processing of personal data of the Reference Person.

## The Application Process

When an applicant applies for a position (including both open and unadvertised positions) at a company in the Advisense Group, your personal data will be processed by Teamtailor (processor). Advisense is the controller for the whole Advisense Group for the processing of the personal data you submit in your application through the recruitment system.

During the application process, you might be invited to take part in tests to assess your match with the description of the position. 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 Advisense will be the controller for any data disclosed by Alva Labs.

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<sup>1</sup> The Advisense Group consist of FCG Holding AB (under the name change to Advisense Group AB) and its subsidiaries: Advisense Sweden AB, Grand Compliance Global AB, Advisense Denmark A/S, FCG Fonder AB, Advisense Germany GmbH, Advisense Finland Oy, Algorithmica Research AB, Advisense Norway AS, Advisense Baltics UAB, Advisense Belgium SA.

## Type of Personal Data

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

With regards to the Reference Person, Advisense will collect personal data about your name, verifications of your information, and the answers you provide relating to 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.

Personal data relating to the Reference Person will be collected from the applicant.

## 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 Advisense. It may also be used to perform employee screening when necessary. Your personal data may be shared within the Advisense Group for the purpose of the recruitment. Where third parties (including processors) are required to assist Advisense for the purposes described, Advisense will ensure that any third party has appropriate security measures in place to protect your personal data in line with Advisense's own policies.

Based on your consent, we will use your personal data to keep you posted on upcoming positions within the Advisense 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 using the contact details provided in this Privacy Notice.

With regards to the Reference Person, the personal data are processed for the purpose of recruitment of the applicant, and to consider the applicant's profile and qualifications for a role at Advisense.

## How long will Advisense 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 Advisense for a period after the date of your application and for the purposes of considering you for potential future opportunities within the Advisense Group if consent is given. The maximum retention period for personal data in connection to you applying to a position at Advisense is 24 months after the given consent and/or application to the position.

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 Person, 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') per Article 46(2)(c) of the GDPR. Data subjects have the right to request a copy the specific SCC related to the transfer of personal data outside of the EEA.

Please contact [dataprotection@advisense.com](mailto:dataprotection@advisense.com) for any questions of copy requests of the SCC.

## What legal basis do we use to process your personal data?

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

- ☐ *Legitimate Interest* – for Advisense's legitimate interest of finding a suitable candidate for the current and future roles in the Advisense Group.
- ☐ *Legal Obligation* – for the establishment, exercise or defence of legal claims in the context of the recruitment process and to be able to answer questions from you regarding the recruitment process.
- ☐ *Consent* – when being added to our career database and potential contacts regarding upcoming positions within the Advisense 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:** when the legal basis of the processing is Advisense's or a third party's legitimate interest, 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 performance of a contractual relationship, you have the right to request that we provide you with personal data in 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.

The lead supervisory authority for Advisense's operations is the Swedish Authority for Privacy Protection (sw: *Integritetsskyddsmyndigheten*): [Swedish Authority for Privacy Protection | IMY](#)

Applicants and Reference Persons in Advisense's countries of establishment have a right to lodge a complaint with their national supervisory authority in addition to the Swedish Authority for Privacy Protection.

## Questions and exercising your rights.

To exercise your rights, please contact Advisense: [dataprotection@advisense.com](mailto:dataprotection@advisense.com)

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.

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

