

AVK GROUP PRIVACY POLICY FOR APPLICANTS

This privacy policy describes how AVK Holding A/S, Søndergade 33, 8464 Galten, (hereinafter “we”, “our” or “us”) process personal data of applicants (“you”) for positions at AVK, including those applying for advertised vacancies as well as unsolicited applications.

We respect your privacy and is committed to follow the data privacy obligations as set out in the applicable regulations, including the General Data Protection Regulation (the “GDPR”). We want to make sure you are comfortable with our privacy policy, the security measures and procedures that we take to protect your personal data.

We have implemented a high standard of data protection. If you provide us with personal data or if we collect personal data about you from other sources, we will be data controller for the processing of such personal data, and we will at all times handle your personal data in accordance with this policy. We encourage you to read this privacy policy in full and to review our policy on a regular basis in case of changes.

Please see below for an overview of which processing activities we perform, including what the legal basis and purpose of such processing activities are. If you have any questions to this policy, or if you wish to exercise any of your data subject rights, please contact us by email: legal@avk.dk.

1. Categories of personal data, purposes with processing and legal basis

We will collect and process your personal data in different ways when you engage with us.

Some of the personal data is necessary for us to process in order to receive your application, and some personal data you can choose to provide voluntarily. We will not process any special categories of personal data (as set out in GDPR article 9) about you unless (i) it is specifically necessary in relation to the position you are applying for, and you have provided your explicit consent thereto, or (ii) we are required by law to process such personal data. We will at all times recommend and ask you never to provide us with any such categories of personal data through any of our forms or correspondences.

We collect your personal data directly from you. Alternatively, we may collect personal data from our recruitment system, your references (if any), public sources, our internal references, and from our relationship with you.

Applicants for advertised vacancies

We process personal data about you, when you apply for an advertised vacancy at AVK.

The personal data we process about you is information provided by you in your application including e.g., CV, examination certificates and recommendations as well as potential further information obtained by or through third parties e.g., references and personality tests. The personal data we process about you is primarily ordinary categories of personal data, e.g. name and contact information (such as telephone, address, and email address), employment details (such as previous positions, and salary) and background details (such as educational qualifications). However, we may in specific situations process special categories of personal data about you (as set out in GDPR article 9) such as health information given from the references or criminal history as described in your criminal record.

The purpose of our processing is to make a substantiated evaluation of your application to determine your qualifications, skills and personality in relation to a particular position. The purpose of processing is also to communicate with you during the recruitment process.

The legal basis for our processing is our legitimate interest to communicate with you and evaluate applicants to find the best suitable candidate for the position applied for, cf. GDPR article 6(1)(f). We have performed an assessment of these legitimate interests, and it is our assessment that our legitimate interests override your interest or fundamental rights and freedoms.

If you are not offered the position, but we continue to consider your application, qualifications, and overall profile relevant, we may request your consent to retain your unsolicited application for a longer period (up to 6 months). For the avoidance of doubt, we would like to emphasise that we never retain your personal data for longer than necessary. The legal basis for this extended processing is your consent pursuant to Article 6(1) (a) of the GDPR. You have the right to withdraw your consent at any time. However, the withdrawal of consent shall not affect the lawfulness of any processing carried out prior to such withdrawal.

Unsolicited applications

We process personal data about you, when you send an unsolicited application to AVK.

The personal data we process about you is information provided by you in your application including e.g., CV, examination certificates and recommendations as well as potential further information obtained by or through third parties e.g., references and personality tests. The personal data we process about you is primarily ordinary categories of personal data, e.g. name and contact information (such as telephone, address, and email address), employment details (such as previous positions and salary) and, background details (such as educational qualifications). However, we may in specific situations process special categories of personal data about



you (as set out in GDPR article 9) such as health information given from the references or criminal history as described in your criminal record.

The purpose of our processing is to make a substantiated evaluation of your application to determine if your qualifications, skills and personality match a position within AVK. The purpose of processing is also to communicate with you to inform about your application.

The legal basis for our processing is our legitimate interest to communicate with you and evaluate unsolicited applications to keep the positions at AVK occupied by qualified people, cf. GDPR article 6(1)(f). We have performed an assessment of these legitimate interests, and it is our assessment that our legitimate interests override your interest or fundamental rights and freedoms.

However, if we do not have a current position that fits your profile, but still find your application, qualifications and overall profile relevant, we may ask you if we can store your unsolicited application for a longer period of time (up to 6 months). For the avoidance of doubt, we will never store the personal data about you for a longer period of time than necessary. The legal basis for this extended processing is your consent, cf. GDPR article 6(1)(a). You have the right to withdraw your consent to our processing of your personal data at any time. However, please note that withdrawal does not affect the lawfulness of processing carried out before your withdrawal.

2. Automatic individual decisions

Your data is not used for any automated individualised decision-making.

3. Sub-processors

We use external services which process personal data on our behalf, such as affiliates, partners or other collaborators for business purposes, e.g., providers of hosting, cloud computing, IT-services such as Teamtailor for our recruiting system setup, IT-support, administrative services, training services. Such recipients are only allowed to process the personal data according to our instructions and the relationships are governed by written and adequate data processor agreements to ensure an adequate level of data protection.

Under specific circumstances, we may disclose your personal data to advisers or other relevant third parties if it is necessary and lawful for the purposes, (e.g., disputes, defending, establishing, or exercising our legal claims).

The data processors are not permitted to process your personal data for their own purposes, and they may only process the personal data in accordance with our documented instructions and the data processing agreement.

4. Disclosure and transfer of personal data

Our disclosure and transfer of your personal data to recipients (natural or legal persons, public authorities, agencies or others, to which the personal data is disclosed) is kept to a minimum and is subject to an adequate level of data protection.

We may disclose or make personal data available to recipients under the following circumstances:

- To establish, exercise or defend our legal rights.
- If you have provided your prior consent to the disclosure of personal data to a recipient.
- In the event of any merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our assets or stock.

If the recipient of personal data is located in a country outside the EU/ EEA which does not ensure an adequate level of data protection, we will ensure that the transfer will be done in accordance with the applicable data protection regulations, e.g., by only transferring your personal data subject to execution of appropriate written agreements based on the EU Commissions Standard Contractual Clauses or similar approved protection regime, and to parties that can ensure an adequate level of protection. You can receive a copy of the basis for such transfers upon request. Please feel free to contact us in this matter. You can receive a copy of the basis for such transfers upon request. Please feel free to contact us in this matter.

5. Storage period

We do not store personal data for longer than legally permitted and necessary for the related processing purposes. The storage period depends on the type of personal data, the purposes and the applicable law and therefore varies:

- **Applicants who get hired within AVK based on the application:**
If your application results in a position within AVK, then AVK will store your personal data as set out in the privacy policy for employees. Information requiring only a brief check during the application process, such as criminal records, personality tests and references, will be deleted without undue delay after the relevant personnel have reviewed them for any potential employment concerns.
- **Applicants who do not get hired within AVK based on the application:**
If your application does not result in a position within AVK, we will delete your personal data without undue delay.
- **Applicants who may be relevant for upcoming positions in AVK:**
If we wish to include you in our database of potential candidates for future positions or positions other than the one applied for, and you provide us with your consent hereto, we will store your application for up to 6 months after the initial denial of the application.
- **Inquiries, regulatory obligations and legal matters:**
We may store your personal data for a longer period than 6 months if your personal data is needed to respond to any potential related inquiries, comply with regulatory obligations or to deal with potential legal matters or similar necessary actions for which your personal data is needed.

We erase personal data after the above storage period or when you request us to erase the personal data, unless there are legal or regulatory requirements which may require us to retain your personal information.

6. Data security

In order to safeguard your personal data, we have implemented appropriate technical and organisational measures to ensure a level of security which matches the risks represented by the processing and the nature of the



personal data to be protected, taking into consideration the state of art and the costs of implementing such measures.

Following the evaluation of the risk, we have taken measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where the processing involves the transmission of personal data over a network, and against all other unlawful forms of processing.

7. Your rights

When we process personal data about you, you have several rights according to the data protection regulations, which you (with the limitations that follow the legislation) can exercise. If you want to exercise your rights, you are welcome to contact us by e-mail: legal@avk.dk.

You have the following rights:

- **Right of access:** You have the right to request access to the personal data we process, including receiving a copy and obtaining additional information about our processing.
- **Right to rectification of incorrect information:** You have the right to request the rectification of inaccurate personal data about you or the completion of incomplete personal data about you.
- **Right to erasure of data:** You have the right to request the deletion of your personal data, e.g., if the processing is based on a consent that you choose to withdraw.
- **Right to restriction of processing:** You have the right to request the restriction of the processing of your personal data, for example, if there is doubt about the accuracy of the data or if its accuracy is disputed.
- **Right to data portability:** Since our processing of your personal data is automated and based on your consent, you have the right to request to receive all personal data you have provided to us. You have the right to receive this data in a structured, commonly used, and machine-readable format, as well as to request that the data be transmitted to another data controller (provided it is technically feasible).
- **Right not to be subject to automated decisions:** You have the right to request not to be subject to a decision based solely on automated processing (e.g., profiling) if it has legal consequences or similarly significantly affects you.
- **Right to withdraw your consent:** You have the right to withdraw your consent to our processing of your personal data at any time. However, please note that withdrawal does not affect the lawfulness of processing carried out before your withdrawal.

Right to object: You have the right – on grounds relating to your particular situation – to object to the processing of your personal data where our legal basis is "legitimate interests." If you object, we may no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or if the processing is legally required or necessary for the establishment, exercise, or defense of legal claims.

Right to lodge a complaint: If you disagree with or are dissatisfied with our processing of your personal data, you are always welcome to contact us at legal@avk.dk. You also have the right to file a complaint with the relevant supervisory data protection authority in Denmark:

The Danish data protection agency
Carl Jacobsens Vej 35,
2500 Valby, Denmark
Telephone 33 19 32 00
E-mail dt@datatilsynet.dk

You can also access the Danish data protection agency's website with guidance on complaints and a form for submitting complaints via this link: [Sådan klager du](#)

8. Amendments

We may modify our policy from time to time about e.g., new technologies, new regulatory requirements or other relevant purposes. The updated policy applies to you and our use of personal data. Therefore, we kindly ask you to review our policy on a regular basis.

9. Contact

If you have any questions about the processing of your personal data or if you wish to exercise any of your rights, please contact us at legal@avk.dk.

