# CANDIDATES/JOB APPLICANTS

You are a candidate or job applicant if you have applied for work with any of the companies that are included in ICA Gruppen and its subsidiaries.

The ICA company with which you have applied for a job is responsible for processing your personal data in a secure and correct manner.

# FROM WHERE DO WE COLLECT PERSONAL DATA?

#### You yourself

We collect the personal data that you provide to us yourself in connection with the recruitment process, such as your CV and personal letter.

#### **Recruitment companies**

If we have used the services of a recruitment company, we collect the personal data that the recruitment company has provided to us.

#### **Reference persons**

Normally we obtain assessments about you from reference persons in the final stages of the recruitment process. In such cases we collect the personal data that the reference person provides about you.

#### Generally accessible information sources

In certain cases we collect information that is generally accessible, such as social media, as documentation for review of an application.

#### **Public records**

In connection with the signing of an employment contract we check the information that you have provided against public records to ensure that we have correct information about you.

# WHY DO WE PROCESS YOUR PERSONAL DATA?

#### To manage the recruitment process

We use the information we have collected to manage the recruitment process. More specifically, we use the information to accept and review your application documents (such as your CV and personal letter), and to evaluate your application. It is necessary that you provide the information we need to be able to evaluate your application. We also use your information to communicate with you during the recruitment process.

#### For future recruitment

We want to be able to save your information for future recruitment. In connection with your submission of an application, we ask for your consent to this. It is entirely voluntary to provide your consent, and you can withdraw consent that you have given at any time.

#### To perform controls, tests and suitability tests

In certain cases we perform various types of controls, tests and suitability tests as part of the recruitment process. In connection with your submission of an application we ask for your consent to use your personal data for this purpose.

# To evaluate and follow up the recruitment process

We use your personal data to evaluate and follow up the recruitment process. More specifically, we do this to produce reports and statistics on the number of applicants per position and in general.

# To meet legal obligations

We must use your personal data to meet legal obligations of the ICA company in question. For example, we use your personal data to meet the requirements of the Employment Protection Act (*Lagen om anställningsskydd (LAS)*).

# To address and meet legal requirements

We use your personal data to address and meet legal requirements, such as in a dispute or legal process.

# **RECIPIENTS WITH WHOM WE SHARE INFORMATION**

#### Vendors

We share your personal data with our vendors who help us with, for example, IT services or to perform various controls and tests. These companies may only use your personal data in accordance with our instructions, and they may not use your personal data for their own purposes. We are responsible for how your personal data is processed by the vendors who perform work for us.

The vendor of our HR system is in the USA and has undertaken to protect your personal data in the same way that we do by registering in the *Privacy Shield Framework*. You can read more about this framework on the <u>U.S. Department of Commerce's website</u>.

#### Authorities

Prior to any possible employment we must in certain cases share your personal data with pertinent authorities. We do this to

- meet the legal obligations that apply for the respective ICA companies (for example, to verify the eligibility that is required for the position), and
- to manage and meet all types of legal requirements (such as in connection with a legal process or a dispute).

#### Union organisations and employer organisations

In certain cases we share your personal data with trade unions and employer organisations. We do this to

• meet the legal obligations that apply for the respective ICA companies (such as the negotiation and information obligations in connection with managerial appointments), and

• to manage and meet all types of legal requirements (such as in connection with a legal process or a dispute).

# **External advisers**

If it is necessary to manage and meet a legal requirement, we may share your personal data with external advisers (such as law firms or other legal agencies).

#### **DETAILED INFORMATION ABOUT RECORDS**

#### Management of the recruitment process

Categories of personal data	Legal basis
<ul> <li>Audiovisual material</li> <li>Demographic information</li> <li>Identity information, including personal identity</li> </ul>	<i>Contracts.</i> Processing is necessary to take actions prior to reaching any employment contract.
number • Competence information	Processing of your personal identity number is necessary in view of the purpose of the processing.
<ul> <li>Contact information</li> <li>Information about union membership</li> <li>Information from your references</li> <li>Information about social conditions</li> </ul>	We process any special categories of personal data, such as health information and information about unior membership, only if you voluntarily provide us with such information, and then only on the basis of your explicit consent.

**Storage period:** Your personal data is stored during the recruitment process for this purpose and for a period of 26 months thereafter in order to pursue our legitimate interest in managing and meeting all types of legal requirements.

#### **Future recruitment**

Categories of personal data	Legal basis
<ul> <li>Audiovisual material</li> <li>Demographic information</li> <li>Identity information, including personal identity number</li> <li>Competence information</li> <li>Contact information</li> <li>Information about union membership</li> <li>Information from your references</li> <li>Information about social conditions</li> </ul>	<ul><li><i>Consent.</i> Processing is done on the basis of your consent.</li><li>We process special categories of personal data, such as health information and information about union membership, on the basis of your explicit consent.</li></ul>

# Perform controls, tests and suitability tests

	Categories of personal data	Legal basis
•	Identity information, including personal identity	Consent. Processing is done on the basis of your

number • Test information	<ul><li>consent.</li><li>Processing of your personal identity number is necessary in view of the purpose of the processing.</li><li>We process special categories of personal data, such as health information and information about union membership, on the basis of your explicit consent.</li></ul>
	membership, on the basis of your explicit consent.

**Storage period:** Your personal data is stored during the recruitment process for this purpose and for a period of 26 months thereafter in order to pursue our legitimate interest in managing and meeting all types of legal requirements.

# Evaluate and follow up the recruitment process

Categories of personal data	Legal basis
<ul> <li>Employment information</li> <li>Demographic information</li> <li>Identity information</li> <li>Competence information</li> <li>Organisational information</li> </ul>	<i>Legitimate interest.</i> Processing in necessary to pursue our legitimate interest in following up and evaluating the recruitment process.
<b>Storage period:</b> Reports at an overarching level that do not include any personal data and statistics are saved for an indefinite period of time.	

# Meet legal obligations

Categories of personal data	Legal basis
<ul> <li>Identity information, including personal identity number</li> <li>Employment information</li> <li>Organisational information</li> </ul>	Legal obligation. Processing is necessary to meet legal obligations that the recruiting ICA company is subject to. Processing of your personal identity number is necessary in view of the purpose of the processing.
Storage period: Your personal data is stored for the time needed by the recruiting ICA company to be able to	

meet its legal obligations.

# Manage and meet legal requirements

Categories of personal data	Legal basis
<ul><li>Employment information</li><li>Audiovisual material</li><li>Demographic information</li></ul>	<i>Legitimate interest.</i> Processing is necessary to pursue our legitimate interest in managing and meeting legal requirements, such as in a dispute or legal process.
<ul> <li>Identity information, including personal identity number</li> <li>Competence information</li> <li>Contact information</li> </ul>	Processing of your personal identity number is necessary in view of the purpose of the processing.
	We process any special categories of personal data,

٠	Organisational information	such as information about union membership and health
•	Information about union membership	information, if it is necessary to manage and meet legal
•	Information from your references	requirements.
•	Information about social conditions	
Sto	rage period: Your personal data is stored during	the time that is needed to manage and meet the legal
req	uirement.	

DETAILED INFORMATION ABOUT RECIPIENTS WITH WHOM PERSONAL DATA IS

# Authorities

SHARED

Meet legal obligations

Categories of personal data	Legal basis for sharing
<ul> <li>Identity information, including personal identity number</li> <li>Employment information</li> <li>Organisational information</li> </ul>	Legal obligation. Processing is necessary to meet legal obligations that the recruiting ICA company is subject to.
	Processing of your personal identity number is necessary in view of the purpose of the processing.

# Manage and meet legal requirements

Categories of personal data	Legal basis for sharing
<ul> <li>Employment information</li> <li>Audiovisual material</li> <li>Demographic information</li> <li>Identity information, including personal identity number</li> <li>Competence information</li> <li>Contact information</li> <li>Organisational information</li> <li>Information on union membership</li> <li>Information from your references</li> <li>Information on social conditions</li> </ul>	<ul><li>Legitimate interest. Processing is necessary to pursue our legitimate interest in managing and meeting legal requirements, such as in a dispute or legal process.</li><li>Processing of your personal identity number is necessary in view of the purpose of the processing.</li><li>We share any special categories of personal data, such as information about union membership and health information, if it is necessary to manage and meet legal requirements.</li></ul>

# Trade unions and employer organisations

Meet legal obligations

Categories of personal data	Legal basis for sharing
<ul><li>Audiovisual material</li><li>Demographic information</li></ul>	<i>Contracts.</i> Processing is necessary to take actions prior to drawing up an employment contract.
<ul> <li>Identity information, including personal identity number</li> <li>Competence information</li> <li>Contact information</li> </ul>	Processing of your personal identity number is necessary in view of the purpose of the processing.

<ul> <li>Information on union membership</li> <li>Information from your references</li> <li>Information on social conditions</li> </ul>	We process any special categories of personal data, such as health information and information about union membership, if it is necessary to meet our obligations or exercise our rights in labour law.
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Manage and meet legal requirements

Categories of personal data	Legal basis for sharing
<ul> <li>Employment information</li> <li>Audiovisual material</li> <li>Demographic information</li> <li>Identity information, including personal identity number</li> <li>Competence information</li> <li>Contact information</li> <li>Organisational information</li> <li>Information on union membership</li> <li>Information from your references</li> <li>Information on social conditions</li> </ul>	<ul><li>Legitimate interest. Processing is necessary to pursue our legitimate interest in managing and meeting legal requirements, such as in a dispute or legal process.</li><li>Processing of your personal identity number is necessary in view of the purpose of the processing.</li><li>We share any special categories of personal data, such as information on union membership and health information, if it is necessary to manage and meet legal requirements.</li></ul>

# External advisers

Manage and meet legal requirements

<ul> <li>Audiovisual material</li> <li>Demographic information</li> <li>Identity information, including personal identity number</li> <li>Competence information</li> <li>Contact information</li> <li>Organisational information</li> <li>Information on union membership</li> <li>Information from your references</li> </ul>	<i>nate interest.</i> Processing is necessary to pursue gitimate interest in managing and meeting legal ements, such as in a dispute or legal process. sing of your personal identity number is ary in view of the purpose of the processing. are any special categories of personal data, such rmation on union membership and health ation, if it is necessary to manage and meet equirements.