

INFORMATION ABOUT CARNEGIE'S PROCESSING OF PERSONAL DATA RECRUITMENT

In this information, we describe which personal data we process, why we process the personal data and what your rights are. If you have any questions about our processing of your personal data, please contact us or our data protection officer via the contact details provided in section 1 below.

It is of great importance to us that you feel safe with our processing of your personal data. We implement relevant and suitable measures to ensure that your personal data are protected and that the processing takes place in accordance with applicable data protection legislation and our internal policies.

1 WHO IS THE DATA CONTROLLER AND WHO SHOULD YOU CONTACT?

Carnegie AS, reg. no. 936 310 974, or Carnegie AS' wholly owned subsidiary Cranegie Business Management AS, reg. no. 819 999 732, (together referred to as "Carnegie", "we", "us", "our") are the data controller of the processing of your personal data in relation to the recruitment process and are accountable for ensuring that your personal data are processed in accordance with applicable data protection legislation.

If you have any questions about how your personal data are processed, please contact us by using the contact details below.

Carnegie AS
Att: Carnegie AS HRAker Brygge Fjordalléen 16
0250 Oslo
Email: hr@carnegie.no

Our data protection officer is assigned to monitor our compliance with applicable data protection legislation. If you have any questions or would like to make a complaint about our processing of your personal data, you can contact our data protection officer at dpo@carnegie.no.

2 WHAT PERSONAL DATA DO WE PROCESS?

In connection with recruitment, we process personal data about candidates and references. A candidate includes those who apply for a position with us and a reference includes those who a candidate has indicated as a reference in their application.

We only collect the personal data we need to carry out the different steps of the recruitment process. The personal data we collect depends on how you interact with us and whether you are a candidate or reference. We collect and process the following categories of personal data:

- **Identification data:** data that allows you to be identified, such as your name and personal identification number.
- **Contact details:** information that allows us to contact you, such as your address, e-mail address and telephone number.

- **Profile data:** information about your profile, such as gender, age, current position, details of current employer or principal.
- **Qualifications:** information on your skills, such as education, professional experience, language skills and certifications.
- **Communication:** data in your communication with us, such as the content of e-mails.
- **Test data:** data related to tests performed, such as test results, time of the test and type of test.

3 WHY, BASED ON WHAT LEGAL BASIS AND FOR HOW LONG DO WE PROCESS YOUR PERSONAL DATA?

In connection with the recruitment process, we will process your personal data as set out in the table below.

Why do we process your personal data (purpose)?	Which personal data do we process?	What is our legal basis for the processing?	How long do we keep the personal data?
Manage the recruitment process.	Identification data, Communication, Qualifications, Contact details, Profile data.	Performance of a contract (GDPR, article 6.1(b)) - taking measures at your request before (possibly) entering into an employment contract. Legitimate interest (GDPR, article 6.1(f)) – the processing is necessary to fulfil our legitimate interest in managing the recruitment process. Contact us if you would like to know more about how we have balanced your interests against ours.	Under the recruitment process and 24 months thereafter to fulfil our legitimate interest in managing and responding to potential legal claims.
Save your application for future recruitment.	Identification data, Communication, Qualifications, Contact details, Profile data.	Legitimate interest (GDPR, article 6.1(f)) – the processing is necessary to fulfil our legitimate interest in saving your information for future recruitments. Contact us if you would like to know more about how we have balanced your interests against ours.	24 months after the end of the recruitment process and for each additional period thereafter that you agree to have your information saved by us.
Taking references.	Identification data, Contact details, Communication, Profile data.	Legitimate interest (GDPR, article 6.1(f)) – the processing is necessary to fulfil our legitimate interest in contacting your references and obtaining reviews on you as a candidate in a recruitment process.	Under the recruitment process and 24 months thereafter to fulfil our legitimate interest in managing and responding to legal claims.

		Contact us if you would like to know more about how we have balanced your interests against ours.	
Carry out controls and tests.	Identification data, Test data.	Legitimate interest (GDPR, article 6.1(f)) – the processing is necessary to fulfil our legitimate interest in carrying out controls, personality and ability tests. Contact us if you would like to know more about how we have balanced your interests against ours.	Under the recruitment process and 24 months thereafter to fulfil our legitimate interest in managing and responding to legal claims.
Monitor and evaluate the recruitment process.	Identification data, Profile data, Qualifications.	Legitimate interest (GDPR, article 6.1(f)) – the processing is necessary to fulfil our legitimate interest in monitoring and evaluating the recruitment process. Contact us if you would like to know more about how we have balanced your interests against ours.	During the recruitment process and for 24 months thereafter. Statistical data (does not include personal data) is saved until further notice.
Manage and respond to legal claims related to our recruitment process.	Only those categories of personal data that are necessary in order to manage and respond to the legal claim in the individual case.	Legitimate interest (GDPR, article 6.1(f)) – the processing is necessary to fulfil our legitimate interest in managing and responding to legal claims. Contact us if you would like to know more about how we have balanced your interests against ours.	Personal data are saved during the time necessary to manage the legal claim in the individual case.
Fulfilling legal obligations.	Only those categories of personal data that are necessary in order to fulfil the requirements of the legal obligation.	Compliance with a legal obligation (GDPR, article 6.1(c)) – and the Norwegian Act relating to Measures to Combat Money Laundering and Terrorist Financing (the "Norwegian Anti-Money Laundering Act"). ¹	Personal data are saved for as long as it is necessary in order for us to fulfil our legal obligation in the individual case.

4 WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In order to administer the recruitment process and comply with laws and regulations, we need to share your personal data with others. Below you will find more information about the recipients we share your personal data with.

¹ [Lov om tiltak mot hvitvasking og terrorfinansiering \(hvitvaskingsloven\) - Lovdata](#)

4.1 **Suppliers**

To enable us to administer the recruitment process and fulfil the other purposes set out above, we share your personal data with our suppliers. These are companies who provide us with systems necessary for the recruitment process (such as recruitment systems, competence tests and/or recruitment agencies) and who manage the ongoing operation, technical support and maintenance of the systems.

When suppliers process personal data on our behalf and according to our instructions, they are data processors to us and we are responsible for the processing of your personal data. They may not use your personal data for their own purposes and are obliged by law and contract with us to protect your personal data.

4.2 **Other/external companies and third parties**

We may also share your personal data with other third parties:

- *Trade unions*: for example, to manage and respond to legal claims (e.g. in the context of a dispute or proceedings).
- *Authorities*: when required by law or to respond to the request voluntarily.
- *Courts*: in the event of a dispute or other proceedings.
- *Other third parties*: such as external advisors and auditors. Your personal data may also be disclosed to potential buyers and sellers, and their advisers, if it is necessary to carry out a reorganisation, merger, acquisition or sale of all or part of our assets.

4.3 **When our personal data processing takes place outside the EU/EEA**

We always strive to process your personal data within the EU/EEA, but in certain situations we may need to transfer your personal data to other companies within Carnegie and suppliers located outside the EU/EEA (so-called "third countries"). This happens in some cases and to a limited extent to the USA.

Regardless of where your personal data are processed, we implement all reasonable contractual, technical and organisational measures to ensure that the level of protection for the processing is equivalent to what applies within the EU/EEA. To ensure that your personal data are protected in an equivalent manner as if it had remained within the EU/EEA, we also enter into the [European Commission's standard contractual clauses](#) with our partners and service providers who process personal data in third countries. We also take additional technical and organisational safeguards where necessary, such as encryption and pseudonymisation.

5 HOW DO WE COLLECT YOUR PERSONAL DATA?

We mainly collect the personal data that you provide to us yourself (e.g. in writing in your application documents or orally during interviews or other contacts we have). We may also collect information

about you from the recruitment agencies we collaborate with, the individuals you have stated as references in your application documents and from publicly available sources of information such as social media and public registers.

6 DO YOU HAVE TO PROVIDE YOUR PERSONAL DATA?

When we process your personal data, we do so, among other things, for the purpose of administering the recruitment process that you are currently in and to be able to defend ourselves against any legal claims. If you do not provide the personal data we request, we may not be able to assess your suitability for a position with us and therefore cannot offer you an employment. If you have any doubts or concerns about providing certain personal data, please contact us (see section 1 above) for further information.

7 YOUR RIGHTS

7.1 General

We are accountable for your personal data being processed in a legal, transparent and open manner in relation to you.. You have certain rights regarding our processing of your personal data. If you want to exercise any of your rights, you can contact us by using the contact details in section 1 above.

We will get back to you as soon as we can, and at the latest within one month of receiving your request. If we cannot answer your request within the timeline, you will be notified of the reason in writing.

7.2 Right of access

You have the right to know if we process personal data about you or not. If we do, you also have the right to receive information about what personal data we process and how we process it. You also have the right to receive a copy of the personal data we process about you.

If you are interested in any specific information, please indicate this in your request. For example, you can specify if you are interested in a certain type of information or if you want information from a certain time period.

7.3 Right to rectification

If you believe some of the personal data we hold about you are inaccurate or misleading, you have the right to require the personal data to be corrected or supplemented by addition information. Once we have corrected or completed your personal data request, we will attempt to notify third parties of the changes, if relevant. The obligation to notify does not apply if it proves to be virtually impossible.. Upon request, we can provide you with information of who we have shared your personal data with. If you request rectification, you also have the right to request that we restrict our processing during the time we are handling your matter.

7.4 **Right to erasure (right to be forgotten)**

In certain cases, you have the right to request that we erase the personal data we process about you. You have the right to request your personal data erased if the following conditions are met:

- The personal data are no longer necessary for the purposes for which they were collected or otherwise processed, You object to the processing of personal data based on our legitimate interest and we cannot demonstrate that our reasons for processing outweigh your interests,
- The personal data are processed unlawfully, or
- We have a legal obligation to erase the personal data.

If we erase the personal data following your request, we will also notify those third parties that we have shared your personal data with of the erasure. The obligation to notify does not apply if it proves to be virtually impossible. Upon request, we can provide you with information on who we have shared your personal data with.

7.5 **Right to restriction**

You may request that we restrict the way we process your personal data. Right to restriction means that the personal data is marked so that it can only be processed for certain limited purposes in the future.. The right to restriction applies:

- If you believe the personal data is inaccurate and you have requested rectification. You can also request that we restrict our processing while we investigate if the personal data is accurate or not,
- If the processing is unlawful and you do not want the personal data to be erased,
- When we no longer need to process the personal data for the purposes for which we collected it, but you need it to be able to establish, exercise or defend legal claims, or
- If you have objected to processing based on our legitimate interest, you can request that we restrict the processing while we investigate whether our interest in processing your personal data outweighs your interests.

In the event that you have requested that we restrict our processing, we have the right to use the data for storage, to establish, enforce or where necessary in order to comply with our legal obligations or requirements from authorities etc. We may also use the personal data for reasons relating to important public interest. We will let you know before the restriction expires.

In the event that we restrict the processing of your personal data, we will also inform those we have shared your personal data with. The obligation to notify does not apply if it proves to be virtually impossible. Upon request, we will also tell you who we have shared your personal data with.

7.6 **Right to object**

You have the right to object to our processing of your personal data that is based on our legitimate interest. If you object to the processing, we will, based on your specific situation, evaluate whether our interests in processing the personal data outweigh your interests in not having your personal data processed for that purpose. If we cannot demonstrate compelling legitimate grounds that outweigh yours, we will stop the processing to which you object - provided that we do not need to process the personal data for the establishment, exercise or defence of legal claims.

If you object to the processing, you also have the right to request restriction while we investigate the matter.

7.7 **Right to data portability**

Data portability means that you have the right to obtain the personal data we have collected about you, from you, in a structured, publicly available and machine-readable format and that you have the right to transfer it to another controller.

The right to data portability applies only to the personal data:

- You directly have provided to us, about yourself,
- If the processing takes place due to the performance of a contract with you, and
- Where the processing is automated.

7.8 **Right to withdraw consent**

You have the right to withdraw a given consent for a particular processing based on the legal basis of consent at any time. A withdrawal does not affect the lawfulness of our processing before the consent was withdrawn.

7.9 **Right to complain**

If you believe that we have processed your personal data incorrectly or are dissatisfied with our processing of personal data, please contact us and we will try to resolve your issue. Our contact information is stated in section 1 above.

You also have the right to lodge a complaint with the supervisory authority. The Norwegian Data Protection Authority (Datatilsynet) is the Norwegian supervisory authority for our processing of your personal data. You also have the right to lodge a complaint with the supervisory authority in the country where you live, work or where you believe an infringement has taken place. The Norwegian Data Protection Authority's contact information and more information on how to complain can be found at www.datatilsynet.no.

8 **CHANGES TO THE INFORMATION**

We reserve the right to change and update this information from time to time.