



## **RECRUITMENT PRIVACY POLICY**

### **A.P. Møller Capital P/S**

This Privacy Policy explains how A.P. Møller Capital P/S including its branches, subsidiaries, and affiliates ("A.P. Møller Capital", "we", "us" and "our") processes your personal data as part of our recruitment process.

#### **Data controller**

The entity responsible for the processing of your personal data is:

A.P. Møller Capital P/S  
Lyngby Hovedgade 85  
2800 Copenhagen  
Denmark  
CVR-no. 38 28 49 67  
Email: [privacy@apmollercapital.com](mailto:privacy@apmollercapital.com)

#### **Use of personal data**

We use your personal data for the following purposes:

1. *Assessment of application and candidacy*  
To assess your skills, qualities and qualifications in order for us to evaluate your application and candidacy and to determine if we are able to offer you a job position.
2. *Connecting with us*  
If you connect with us by creating a candidate profile, we will be able to consider you for future job openings.

#### **Categories of personal data**

We collect the following categories of personal data about you to each of the mentioned purposes:

1. *Assessment of application and candidacy*
  - Ordinary personal data:
    - Contact information such as name, address, email address, and telephone number
    - Your professional experience, education, and certifications
    - Your resume/CV and information contained herein
    - Your cover letter and information contained herein
    - Information on work permit as well as information on previous work relationship with the A.P. Møller Group (last 5 years)
    - Information on notice period in your current position, your salary expectations, your benefit expectations, and any additional information

As part of our assessment of your skills, qualities and qualifications, we will in some cases ask you to participate in a personality assessment test. In these cases, the results of this personality assessment test will form part of the personal data that we will process about you as part of our assessment of your skills, qualities and qualifications. The results of such tests will be treated confidentially.

We may also request that you provide us with a copy of your criminal records depending on the position for which you are applying. Such information will also be treated confidentially.

As part of our evaluation of you and your application, we may wish to take references from your previous and/or current employers. We will only take up references from people you have explicitly stated in your job application or in other ways provided us with.

Additionally (or if not covered above), if you apply with your LinkedIn-profile:

- Ordinary personal data:
  - Your experience, education, skills, and recommendations
  - Your primary email address associated with LinkedIn-account
  - Your 1st and 2nd degree connections' data
  - Phone number and other contact information associated with your LinkedIn account

## 2. *Connecting with us*

- Ordinary personal data:
  - Contact information such as name, address, email address, and telephone number
  - Your resume/CV

Additionally (or if not covered above), if you create a candidate profile with your LinkedIn-profile:

- Ordinary personal data:
  - Your experience, education, skills, and recommendations
  - Your primary email address associated with LinkedIn-account
  - Your 1st and 2nd degree connections' data
  - Phone number and other contact information associated with your LinkedIn account

We recommend that you do not disclose sensitive personal data, such as information revealing racial or ethnic origin, religion, trade union membership, sexual orientation, health, etc. in your application.

## **Sources**

When we collect information from another source than you, the sources will be:

- Former employers as part of our collection of references (we will only collect references with your acceptance)
- Online sources that are publicly available, such as LinkedIn
- Other third parties, including background check agencies and external recruiters

## **Legal basis**

We process your personal data described above based on the following legal basis in relation to each of the mentioned purposes:

### 1. *Assessment of application and candidacy*

Processing of your personal data when assessing your application and candidacy is necessary for us to take steps at the request of you (by you applying for a job position) prior to entering into an (employment) contract with you as well as to enter into an (employment) contact with you (Article 6 (1)(b) of the GDPR and our legitimate interest in processing the information you

have given us in accordance with Article 6 (1)(f) of the GDPR). In case of processing of your criminal record, we will ask for your consent, whereas our legal basis for such processing of personal data is Article 6 (1)(c) of the GDPR and Section 8 (3) of the Danish Data Protection Act (in Danish: "Databeskyttelsesloven"). Our legal basis for the processing of your references is Article 6 (1)(f) of the GDPR if you have provided the references yourself or your consent to our collection if we ask you for references in accordance with Article 6 (1)(a) of the GDPR.

## 2. *Connecting with us*

Processing of your personal data is necessary for our legitimate interest in considering you for future job openings (Article 6 (1)(f) of the GDPR).

### **Sharing of your personal data**

We share your personal data with:

Suppliers and vendors that we work with to assist our company (meaning service providers, technical support, supply services, personality assessment tests, other Group-entities etc.), with the most relevant ones being Cornerstone OnDemand Europe Limited, who is hosting and providing our HR-platform, Predictive Index, and Hogan Assessment Systems, Inc.

### **Transfers to countries outside the EU/EEA**

During the recruitment process we will be transferring personal data to countries outside the EU/EEA, including the United Arab Emirates. Such transfers will only take place for the specific purposes mentioned above under Section 2, and we will always ensure that appropriate safeguards are in place for such transfer.

If transfers occur to countries outside EU/EEA that do not ensure an adequate level of data protection, such transfer will be based on the EU Commission's standard contractual clauses together with any supplementary measures assessed as necessary, or any other contractual agreement approved by the competent authorities.

You may obtain a copy of the contract/agreement by contacting us at [privacy@apmollercapital.com](mailto:privacy@apmollercapital.com).

### **Retention and deletion of your personal data**

We will retain your personal data concerning:

#### 1. *Assessment of application and candidacy*

All personal data mentioned under Section 4 will be retained for up to 6 months after we have concluded our assessment of your application and candidacy. Some information may be kept for a longer period of time in specific cases, e.g. when we need to retain data to document certain decisions etc. If you accept our offer for a job position (if relevant), we will keep your personal data as part of your employment relationship with us, which will then become subject to a separate privacy policy.

#### 2. *Connecting with us*

All personal data mentioned under Section 4 will be retained for 6 months unless you re-activate your candidate profile every 6 months.

If you are offered a position with A.P. Moller Capital, your application and additional relevant personal data obtained during the recruitment procedure will be stored in your employee file.

## **Mandatory information**

### *1. Assessment of application and candidacy*

Certain information is marked as mandatory. The consequence of not providing the information is that we will not be able to assess your skills, qualities and qualifications, and thus not evaluate your application and candidacy to determine if we are able to offer you a job position.

## **Your rights**

You have the following rights:

- You have the right to request access to and rectification or erasure of your personal data
- You also have the right to object to the processing of your personal data and have the processing of your personal data restricted
- If processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent by contacting us at [privacy@apmollercapital.com](mailto:privacy@apmollercapital.com)
- You have the right to receive your personal information in a structured, commonly used and machine-readable format (data portability)
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency ("Datatilsynet"), Carl Jacobsens Vej 35, 2500 Valby, telephone number +45 33 19 32 00, e-mail [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk).

You can take steps to exercise your rights by contacting us at [privacy@apmollercapital.com](mailto:privacy@apmollercapital.com).

There may be conditions or limitations on these rights. It is therefore not certain for example you have the right of data portability in the specific case – this depends on the specific circumstances of the processing activity.

*Last updated: May 2024*