



RECRUITMENT PRIVACY NOTICE

This Privacy Notice explains how A.P. Møller Capital P/S and its relevant branch, subsidiaries, and affiliates (together, "A.P. Møller Capital", "we", "us" or "our") process your personal data in connection with our recruitment process.

Data controller

The A.P. Møller Capital entity recruiting for the relevant role, or that would employ or engage you if your application is successful, will normally be the data controller responsible for the processing of your personal data under this Privacy Notice. A.P. Møller Capital P/S, including its branch office, may also process personal data for central HR, administration, compliance, reporting and other group support purposes, where relevant.

Contact

For questions about this Privacy Notice or the processing of your personal data, please contact:

A.P. Møller Capital P/S
Tuborg Havnevej 15
2900 Hellerup
Denmark
CVR no. 38 28 49 67
privacy@apmollercapital.com

How we use your personal data

We collect and process personal data about you to manage our recruitment process, assess your application and candidacy, communicate with you, conduct interviews and relevant assessments, verify information provided during the recruitment process, carry out compliance, regulatory, immigration, security or other pre-employment checks where relevant, consider you for future opportunities where you create a candidate profile or otherwise choose to stay in touch with us, and comply with our legal, regulatory and internal governance obligations.

Categories of personal data

Depending on the relevant purpose and the circumstances, we may collect and process the following categories of personal data about you:

- Contact details, such as name, address, email address and telephone number
- Your professional experience, education and qualifications, skills and employment history
- Your CV or resume, cover letter and the information contained in them
- Work permit or immigration-related information, where relevant
- Information about your notice period, salary expectations, benefit expectations, and other information you choose to provide as part of your application
- Information required for compliance, regulatory, sanctions, AML, conflicts of interest, fitness and propriety, or similar pre-employment checks, where relevant to the role and required or permitted by applicable law
- Candidate profile information, where you create a candidate profile or otherwise choose to stay in touch with us for future opportunities

As part of the assessment process, we may ask you to complete behavioural, cognitive or other relevant assessments. Where this happens, the results of those assessments will form part of the personal data we process in connection with your application. The results of such assessments will be treated confidentially.

In some cases, we may also collect and process information relating to criminal convictions, offences or related checks where this is required or permitted by applicable law and is relevant to the role for which you are applying. Such information will be treated confidentially.

As part of our evaluation of your application, we may also take references from previous or current employers or other referees where you have provided their details, authorised us to contact them, or where reference checks are otherwise required or permitted by applicable law.

If you apply or create a candidate profile using your LinkedIn profile, we may collect personal data made available to us through that profile, such as your experience, education, skills, recommendations, contact details and other profile information.

You should not include special category personal data in your application unless it is specifically requested or clearly relevant. This includes, for example, information revealing racial or ethnic origin, religious or philosophical beliefs, trade union membership, health data, or data concerning sex life or sexual orientation. If you nevertheless provide special category personal data that we have not requested, for example in your CV or cover letter, we will not use it to assess your application. We will either disregard it or, where appropriate, delete it, and we will only retain or further process such data where we have an appropriate legal basis and any additional condition required under applicable law.

Sources

Where we collect personal data from sources other than you, those sources may include:

- Former employers or other referees, where you have provided their details, authorised us to contact them, or where reference checks are otherwise required or permitted by applicable law
- Publicly available sources, such as LinkedIn or other professional profiles
- Other third parties, including background check providers and recruitment agencies

Legal basis

Depending on the relevant A.P. Moller Capital entity, jurisdiction and processing activity, the data protection laws that may apply include the EU General Data Protection Regulation ("GDPR"), the Danish Data Protection Act ("DDPA" or "Databeskyttelsesloven"), DIFC Law No. 5 of 2020 – Data Protection Law ("DPL"), the ADGM Data Protection Regulations 2021 ("DPR"), Moroccan Law No. 09-08 relating to the protection of individuals with regard to the processing of personal data, and the Singapore Personal Data Protection Act 2012 ("PDPA"), in each case as amended from time to time.

The legal basis for processing your personal data will usually be one or more of the following, depending on the relevant processing activity and the entity involved:

- taking steps at your request prior to entering into an employment contract with you, and, where relevant, entering into an employment contract with you (Article 6(1)(b) of the GDPR, Article 10(b) of the DPL, Article 5(b) of the DPR, and/or Section 13 read with Section 15 of the PDPA);

- compliance with legal and regulatory obligations, including where recruitment-related checks are required by applicable law or regulation (Article 6(1)(c) of the GDPR, Article 10(c) of the DPL, Article 5(c) of the DPR, and/or Section 11(1) of the PDPA);
- our legitimate interest in managing recruitment, assessing your application and candidacy, verifying information provided during the recruitment process, considering you for future opportunities, carrying out relevant compliance and security checks, and managing related business operations (Article 6(1)(f) of the GDPR, Article 10(f) of the DPL, Article 5(f) of the DPR, and/or First Schedule, Part 3, Paragraph 1 of the PDPA); and
- your consent, where consent is required under applicable law (Article 6(1)(a) of the GDPR, Article 10(a) of the DPL, Article 5(a) of the DPR, and/or the consent provisions of the PDPA).

In cases where we process information relating to criminal convictions, offences or related checks, we will only do so where this is required or permitted by applicable law and where there is an appropriate legal basis and any additional condition required under applicable law, including, where relevant, Article 6(1)(c) of the GDPR, Section 8(3) of the DDPA, Article 10(c) of the DPL, Article 5(c) of the DPR, and/or Section 13 of the PDPA.

Processing of references is based on our legitimate interest in verifying information provided during the recruitment process and assessing your suitability for the relevant role, where you have provided the referee details or otherwise indicated that we may contact the referee. We will not contact your current employer or any referee you have not authorised us to approach without first obtaining your consent, unless this is required or permitted by applicable law. Where applicable law requires consent before we contact a referee, we will obtain that consent before doing so. If reference checks are required by law or regulation for a specific role, processing may also be based on compliance with legal or regulatory obligations.

Sharing of your personal data

We share your personal data with affiliates, service providers and vendors that support our recruitment activities and business operations, including recruitment agencies, background check providers, assessment providers, IT and technical support providers, relevant A.P. Moller Capital Group entities; and external advisers, regulators, authorities or other third parties where disclosure is required or permitted by law.

Transfers to countries outside the relevant jurisdiction

During the recruitment process we may transfer personal data to countries outside the jurisdiction in which it was originally collected, including the United Arab Emirates (including DIFC and ADGM), Morocco and Singapore. Such transfers will only take place where necessary for the purposes described in this Privacy Notice and where appropriate safeguards or other valid transfer mechanisms are in place under applicable data protection law. Where we receive a request for disclosure from a public authority, law enforcement body or regulator, we will assess the request in accordance with applicable data protection laws.

Where required, transfers will be protected by an adequacy decision or equivalent recognition, standard contractual clauses or equivalent safeguards, an intra-group data sharing arrangement, or another lawful transfer mechanism recognised under applicable law.

You may request further information about the relevant transfer mechanism by contacting us at privacy@apmollercapital.com.

Retention and deletion of your personal data

We retain your personal data for as long as necessary for the purposes described in this Privacy Notice and in accordance with applicable legal, regulatory and internal retention requirements.:

Personal data processed in connection with your application and candidacy will generally be retained for up to 6 months after we have notified you of the outcome of your application.

Personal data processed for candidate profile and future opportunities purposes will generally be retained for 6 months from the date you create or last update your candidate profile, unless you re-activate your profile during that period. Where justified by our legitimate interests and permitted by applicable law, we may retain your candidate profile for a longer period for future opportunities, normally for no more than 2 years.

Some information may be kept for a longer period in specific cases, for example where we need to retain data to document certain decisions, comply with legal or regulatory requirements, or establish, exercise or defend legal claims.

If you accept an offer for a role with A.P. Møller Capital, your application and additional relevant personal data obtained during the recruitment process will be retained as part of your employment or engagement records, and A.P. Møller Capital's Employee Privacy Notice will apply.

Mandatory information

Certain personal data is required for recruitment, application assessment, compliance, regulatory, immigration, security or other recruitment-related purposes. If you do not provide information that is required, we may not be able to assess your application and candidacy, complete relevant checks, comply with our legal or regulatory obligations, or determine whether we are able to offer you a role.

Your rights

In relation to our processing of your personal data, you have the right to:

- Request access to your personal data and request that inaccurate personal data be corrected or, where applicable, erased.
- Object to the processing of your personal data and request restriction of processing, where applicable.
- Withdraw your consent at any time where processing is based on your consent. Withdrawal of consent will not affect the lawfulness of the processing carried out before that withdrawal. You may withdraw your consent by contacting us at privacy@apmollercapital.com.
- Receive your personal data in a structured, commonly used and machine-readable format and, where applicable, request transmission of that data to another controller (data portability).
- You may always lodge a complaint with the relevant data protection supervisory authority.

Relevant supervisory authorities include:

- A.P. Møller Capital P/S: Danish Data Protection Agency (Datatilsynet), Carl Jacobsens Vej 35, 2500 Valby, telephone number +45 33 19 32 00, email dt@datatilsynet.dk.
- A.P. Møller Capital P/S (DIFC Branch): DIFC Commissioner of Data Protection, The Gate Building, Dubai International Financial Centre, Dubai, United Arab Emirates, telephone +971 4 362 2222, email commissioner@dp.difc.ae. Individuals may also bring claims directly before the DIFC Courts.

- A.P. Møller Capital (ME) Ltd: ADGM Commissioner of Data Protection, ADGM Building, Abu Dhabi Global Market Square, Al Maryah Island, Abu Dhabi, United Arab Emirates, telephone number +971 2 333 8888, email Data.Protection@adgm.com.
- A.P. Møller Capital Morocco S.A.: Commission Nationale de contrôle de la protection des Données à caractère Personnel (CNDP), Avenue Al Arz, Secteur 4, M1, Hay Riad, Rabat, Morocco, telephone number +212 537 57 11 24 / +212 537 57 21 41, email contact@cndp.ma.
- A.P. Møller Capital (Singapore) Pte. Ltd.: Personal Data Protection Commission, 10 Pasir Panjang Road, #03-01 Mapletree Business City, Singapore 117438, telephone +65 6377 3131, [online complaint form](#).

You may exercise your rights by contacting us at privacy@apmollercapital.com.

These rights are not absolute and may be subject to conditions, limitations or exemptions under applicable law. Whether a particular right applies will depend on the circumstances of the specific processing activity.

Further information about the specific legal bases relied on for particular processing activities can be provided on request.

Last updated: 17 July 2026