

2020

RECRUITMENT PRIVACY POLICY

Introduction

By accepting this privacy policy, you consent to our processing of your personal data as further specified below.

Here we specify why we want your data, and what we are going to do with it.

We are obliged to inform you of the following:

- Name of our organisation
- Why we want your data
- What we will do with it
- That you can withdraw your consent at any time, and
- Any third parties who will receive your data

First of all, protecting personal data is essential to us, and we want to be as transparent and open as possible about the use of your data. This policy has been created to ensure transparency into our practices and principles as well as to inform you of your personal rights.

Who we are and how to contact us

“We” are (the company responsible for processing your personal data):

Implement Consulting Group
Company reg. no.: 32767788
Strandvejen 54, 2900 Hellerup, Denmark

You can always reach us at:
Tel: +45 4586 7900
E-mail: privacy@implement.dk

What information is collected about you

When you upload information in our recruitment system (SmartRecruiters), we collect the following information:

- Non-sensitive personal data, i.e. name, position, contact details, educational and professional background and any other personal data which you as an applicant provide, including references.
- Sensitive personal data from references regarding personal performance.
- We might collect personal data about criminal offences, including your criminal record if this is deemed relevant for a position you are being offered.
- Publicly available information, including publicly available information on social media, if relevant.

For which purposes the data are collected

The data are processed only in relation to our HR recruitment process for job applicants.

Processing of the personal data that you upload in our HR recruitment system is based on your consent by accepting this policy.

During the recruitment process, processing of your personal data is also based on our legitimate interest, cf. GDPR, article 6(1)(f), where it is necessary for Implement Consulting Group (hereafter Implement) to process data to recruit applicants to open positions at Implement.

We process personal data collected from references, provided that you have given your specific consent, cf. GDPR article 6(1)(a).

We process personal data on criminal records if it is necessary to ensure that the applicant is suited for the position in Implement, cf. GDPR, article 10 and the Danish Data Protection act section 8 (3).

How and for how long we process the collected data

When you apply for a position in Implement, we are responsible for taking care of your personal data as a data controller, which basically means that we determine the purposes and means of the processing of personal data. We, the company listed above, are responsible for all of Implement's HR processing activities as a data controller on behalf of the companies within the Implement group. The company details for all Implement group companies may be found [here](#).

We store your data for a period of twelve months after the date on which your application was rejected.

If you as an applicant is employed by Implement, the processing of personal data will continue as part of the employment relationship.

Security of processing

Data security is a high priority for us. We work seriously and professionally with information security, and we base our work on internationally recognised security standards. We have implemented security measures to ensure data protection of customer data, personal data and other confidential data. We conduct regular internal follow-ups in relation to the adequacy and compliance of policies and measures.

We occasionally use other third parties, such as subcontractors, in connection with provision of our services. Such third parties may be granted access to personal data in order for them to be able to provide the agreed service. If such third parties process personal data and therefore become data processors, Implement enters into data processing agreements in order to ensure that security is in place to protect data and comply with our data protection obligations. Our HR system (SmartRecruiters) is delivered by SmartRecruiters Ltd, and as such SmartRecruiters Ltd hosts data and acts as a data processor on behalf of Implement.

All Implement's data processors are located within the EU or the UK. Implement's data processing agreements ensure that all processing takes place in accordance with Implement's instructions and is subject to the necessary security requirements.

We do not disclose any personal data to other third parties unless we are under a legal obligation to do so.

Know your rights

As a data subject, you have certain rights regarding your personal data.

1. You have the right to gain access to your personal data that we process.
2. You have the right to have incorrect personal data about you rectified without undue delay.
3. You have the right to have your personal data erased earlier than expiry of our standard retention period of twelve months, where appropriate.
4. You have the right to restrict our processing of your personal data, where appropriate. In such cases, we may only process your data with your consent or in some very specific situations as prescribed by law.
5. You have the right to object to personal data processing if our processing is based on article 6(1)(f). In such cases, we may only process your personal data if we are able to demonstrate compelling legitimate grounds for doing so.
6. You have the right to receive your personal data in a structured, commonly used and machine-readable format ("The right to data portability"). You may also request that we transmit your personal data to another data controller without hindrance.

For further information about your rights as a data subject, please refer to the Danish Data Protection Agency's website (www.datatilsynet.dk), where you will find further guidelines.

When we process personal data based on your consent, you have the right to withdraw your consent at any time. Please contact us to withdraw consent for our processing of your personal data.

How we handle changes to this policy

We acknowledge that transparency is an ongoing responsibility. Therefore, we will continually review and update this policy in order to ensure our compliance with applicable personal data law from time to time.

The data protection policy was updated in (March 2020).

Complaints

If you wish to complain about our processing of personal data, please send an email with the details of your complaint to privacy@implement.dk. We will handle your complaint and get back to you as soon as possible.

You also have the right to lodge a complaint about your rights and Implement's processing of your personal data to the Danish Data Protection Agency. For further information on how to lodge a complaint to the Danish Data Protection Agency, please consult their website: www.datatilsynet.dk.

Statutory rules

The applicable statutory rules for Implement's processing of your personal data may be found in:

- General Data Protection Regulation (GDPR)
- Danish Data Protection Act

FURTHER INFORMATION

If you have any questions or need further information about our recruitment privacy policy, please do not hesitate to contact us:

+45 4586 7900
privacy@implement.dk