

Genan A/S

Personal Data Processing Policy – Applicants

How Genan A/S processes personal data on job applicants

Table of Contents

1.	Introduction.....	3
1.1	Data controller	3
2.	Personal data processing for recruitment purposes.....	3
2.1	Personal data processing in connection with solicited applications.....	3
2.2	Personal data processing in connection with unsolicited applications.....	4
2.3	Correspondence with applicants and data updating.....	4
2.4	References.....	4
2.5	Criminal record data.....	5
2.6	Health data.....	5
2.7	Subsequent employment.....	5
3.	Passing on personal data.....	5
4.	Use of data processors.....	5
5.	Security of personal data.....	6
6.	Your rights.....	6

1. Introduction

Genan is very much aware of the need for adequate protection and sound processing of your personal data. This also applies if you send us an unsolicited job application.

In the following, you can read more about Genan's guidelines for the processing of the personal data submitted when you send us a solicited or an unsolicited job application – or when you are part of a recruitment process to assess whether you qualify for a position with us.

1.1 Data controller

In compliance with current regulations on personal data processing and protection, Genan is considered as data controller in relation to the personal data you may submit to Genan. Please find below all relevant contact details:

Company name:	Genan A/S
Address:	Jegindøvej 16, DK-8800 Viborg
Tel.:	+45 87 28 30 00
VAT no.:	DK54480911
E-mail:	job@genan.eu

2. Personal data processing for recruitment purposes

Genan's processing of your personal data complies with current regulations – including security requirements prescribed by the General Data Protection Regulation (GDPR). Genan has implemented set procedures for the processing of personal data on applicants, and we regularly go through personal data registered, deleting data which is no longer relevant for us to process. Genan also deletes personal data, which an applicant requests us to delete, and which Genan no longer has reason to process.

When you submit an application to Genan and/or when you are part of a recruitment process, you are required to submit a number of personal data. We request this personal data to assess whether you qualify for the position in question – and for working at Genan. Data shall be processed for this purpose only.

Consequently, we urge you only to submit the personal data necessary for us to assess your application. We thus request you not to send us e.g. your social security no. and a certificate of criminal record, unless we have specifically asked you to do so. If you voluntarily send us personal data, which is not necessary, we shall consider this act to be your consent to our processing of this data.

2.1 Personal data processing in connection with solicited applications

In connection with solicited job applications, we process the personal data stated in your application and attachments. Typical such personal data is your contact information, details

about your qualifications, experience, what motivated you to apply as well as your personal and professional qualifications.

All personal data submitted shall be processed and held during the recruitment process. Unless you are recruited, all data will subsequently be deleted from our files. A recruitment process will take 6 months at the most.

If we do not offer you employment, yet, would like to save your application with attachments, we will ask for your written consent, so we may hold your application with attachments for another 12 months. In this case, we will send you a separate e-mail, to which you may reply if you agree to consent.

2.2 Personal data processing in connection with unsolicited applications

We always acknowledge the receipt of unsolicited job applications by return e-mail. We then assess whether to call you in for an interview – of course also depending on whether we have any vacancies at the time.

We will hold your application with attachments for 6 months after receipt, and the documents will then automatically be deleted, unless you have accepted a job offer from us.

If you have not been offered a job within 6 months after we have received your application, and we would like to hold your application with attachments further, we will send you a separate request for your consent.

2.3 Correspondence with applicants and data updating

All correspondence will be per e-mail. Should you wish to correspond through a different channel, please contact us by phone.

If you move to a different address or change your e-mail address while we are retaining your application with attachments, we kindly request that you notify us about this, so that we can make certain that contact details are updated at all times. You are also welcome to send us an updated CV, if the information stated changes significantly.

2.4 References

We will only check references to the extent that these are deemed necessary in the recruitment process – and only if you have been for an interview at Genan for a white-collar position or a special assignment blue-collar position. We will always ask for your consent prior to reference checks with former employers – including information about the contents of previous positions held, task management and handling of responsibility as well as interpersonal skills.

We will delete references along with your application at the end of the recruitment process, unless we employ you, or you consent to our continued processing for another 12 months.

When requesting your consent, we will inform you of the purpose of collecting, processing and holding data.

2.5 Criminal record data

Certificate of criminal record will only be requested for applicants who have been employed by Genan or whom Genan expects to employ – and only where the company deems it relevant and proportionate in relation to the function of the position in question. We never check criminal records unless the individual applicant in question consents.

We only request for a certificate of criminal record if we have offered you employment. If employment is annulled due to offences listed in an applicant's criminal records, the certificate of criminal record will be deleted from our files again.

2.6 Health data

In certain cases, it may be necessary and even mandatory for you to provide health data, which is also classed as sensitive personal data. This applies if you suffer from a condition which affects your ability to work / perform in the position in question. Such data will only be registered, if you consent, or if data falls within section 2 of the Danish Health Information Act (helbredsoplysningsoven), so that you are obliged to inform Genan of such data. If Genan does not employ you, health data will be deleted again along with your application and attachments.

2.7 Subsequent employment

If Genan employs you, all personal data submitted during the recruitment process will be retained for as long as you remain employed.

3. Passing on personal data

Genan does not pass on personal data submitted in applications and attachments or in connection with a recruitment process to any third party.

4. Use of data processors

Your personal data is processed by Genan only – and for the above-mentioned purposes. Genan has, however, contracted with a number of data processors, who process data on behalf of Genan.

These data processors act only as instructed by Genan and in order to handle the tasks, which Genan has entrusted them to handle. Moreover, data processors are subjected to the same

security restrictions as is Genan; and the personal data to which data processors are granted access, is thus always handled confidentially.

5. Security of personal data

Genan processes all personal data confidentially. We have taken a number of technical and organisational measures in order to protect your personal data against accidental or unlawful destruction or revision – as well as to ensure that unauthorised persons do not gain access to your data, and that your data is neither abused nor processed in any other way than in compliance with current regulations on personal data processing and protection.

We run a backup of all electronic data on a daily basis, and we have installed antivirus software and firewalls for the protection of data. Furthermore, we have a number of physical security procedures such as limited access and locking of doors to prevent unauthorised persons from gaining access to offices where data is stored either physically or electronically.

6. Your rights

We are obliged to inform you which personal data Genan processes on you, why we do so, and how long we keep this data for. We have described procedures above. If you have any questions in this respect, or if you would like further information on or insight into the personal data processed, you are always welcome to contact Genan.

If you are under the impression that we process incorrect or misleading information about you, you are entitled to request that we correct this information. When we receive such request, we determine whether or not to correct this information.

In some cases, we are obliged to delete your personal data. This is e.g. the case if we no longer have justified reason for processing this data, or if you withdraw consent, and we have no other grounds on which we may process your personal data. You always have the right to request that we delete your personal data – or to withdraw consent given to us.

You are entitled to object to our processing of your personal data at any time. If we receive such objection, we will decide whether or not to limit the processing of your personal data while evaluating this objection. In some cases, you furthermore have the right to request that your personal data is transferred to you in a common, electronic format (data portability).

If you wish to exercise these rights, you must send a request to Genan to this effect. Contact Genan by e-mail to: job@genan.eu.

In addition to the above, you also have the option to contact the Danish Data Protection Agency to complain about the processing of your personal data.