This document is a translation from the original Swedish document, and in the event of any discrepancies, the Swedish version shall prevail.



# **Privacy Policy for Job Applicants**

#### General

Samhällsbyggnadsbolaget i Norden AB (organization number: 556981-7660) ("SBB", "we" or "us") processes personal data about you when you apply for a job with us. It is important to us that you feel secure about how we handle your personal data. In this privacy policy ("Policy"), we therefore describe how we process your personal data, what personal data we process, and why.

"Personal data" means any information that can be linked to you as an individual, such as name, address, and contact information such as phone number and email address. "Processing" refers to any action we take regarding your personal data, such as collection, organizing, storage, modification, reading, and dissemination.

#### **Data Controller**

Samhällsbyggnadsbolaget i Norden AB (organization number: 556981-7660) is the data controller for the processing of your personal data according to this Policy. If you have questions about our processing of your personal data, you can contact us at gdpr@sbbnorden.se.

## **Our Processing**

Below we describe how we process your personal data, including for what purposes we process your personal data, what personal data we process, on what legal basis we process your personal data, and for how long.

Purpose of the Processing	Categories of Personal Data	Legal Basis	Processing Time
Rekrytering och anställningsförfarand	2	,	,
Recruitment and Employment Process	Name Contact Information Potential personal data: from CVs, cover letters, diplomas, and references, Information provided by you during the recruitment process	Our legitimate interest to receive and manage your job application (Article 6.1 f GDPR).	Until a decision is made to appoint a position.
To save applications for future recruitment	Name Contact Information Potential personal data: from CVs, cover letters, diplomas and references, Information provided by you during the recruitment process	Consent (Article 6.1 a GDPR).	Up to two years after a decision has been made to appoint the current position or until you withdraw your consent.

To establish and defend against legal claims.	Name Contact information Possible personal data that may be revealed through: CV and personal letter Grades and references Information provided by you during the recruitment process	Our legitimate interest in establishing and defending against legal claims (Article 6.1 f) GDPR).	Personal data is processed for up to two years after a decision has been made to appoint the relevant position, in accordance with the statute of limitations in the Discrimination Act (2008:567)."
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#### Who Has Access to Your Personal Data?

We may assign our service providers to perform some processing for us. These service providers then act as our data processors. This is the case, for example, with some of our IT providers. We may also disclose your personal data to authorities and other actors if we are required to do so by law or governmental decision.

## Processing of Your Personal Data Outside the EU/EEA

Some of our service providers may have all or part of their operations located in countries outside the EU/ EEA. The transfer of personal data only occurs to such countries that the European Commission deems to have an adequate level of protection, in accordance with Article 49 of the GDPR.49You can see a list of such countries on the European Commission's website: www.commission.europa.eu.

In some cases, we may need to use providers that transfer personal data to countries not covered by an adequacy decision. In these situations, we ensure that the transfer is covered by an appropriate transfer mechanism, such as the European Commission's standard contractual clauses for transfers to third countries (2021). The European Commission's standard contractual clauses are available on the European Commission's website: www.commission.europa.eu.

## Your Rights in Relation to Our Personal

## **Data Processing**

Below are the rights you have concerning your personal data. If you wish to exercise any of these rights, please contact us at gdpr@sbbnorden.se.

#### **Right of Access**

You have the right to request information about whether we process your personal data, which personal data we process, and how the personal data is processed. You also have the right to request a copy of the personal data we process about you (known as a "data subject access request").

#### **Right to Rectification**

You have the right to request that incorrect personal data be corrected, for example, if you have changed personal data or if your personal data is incomplete.

#### **Right to Object**

You have the right to object to personal data processing based on the legal basis of legitimate interest, GDPR Article 6.1 f). Note that if we can demonstrate that our legitimate interest in processing outweighs your rights and freedoms, we may continue processing despite your objection.

#### **Right to Erasure**

You have the right to request that we delete your personal data if:

- The personal data is no longer necessary for the purposes for which they were processed,
- You withdraw your consent (if the processing is based on consent),
- You object to the processing and there are no legitimate grounds for us to continue processing,
- The processing is unlawful, or
- The personal data must be erased to comply with a legal obligation that applies to us.

#### **Right to Restriction**

You have the right to request that we restrict the processing of your personal data (which means that we stop part of the data processing) if:

- You contest the accuracy of the personal data (restriction applies only while we verify the accuracy),
- The processing is unlawful and you request restriction instead of erasure,
- The personal data is no longer needed for the purposes for which they were processed, but you need them to establish, exercise, or defend legal claims,
- You have objected to processing pending the verification of whether our legitimate grounds override your rights.

#### **Right to Data Portability**

You have the right to have your personal data transferred to another data controller and to receive the data in a structured, commonly used, and machine-readable format.

## **Right to Withdraw Consent**

If the processing is based on consent, you have the right to withdraw your consent at any time. However, please note that withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal.

## **Right to Lodge a Complaint**

If you wish to lodge a complaint about our processing of your personal data, you can contact the Swedish Authority for Privacy Protection (IMY). You can read more about your rights and how to lodge a complaint on the IMY website: www.imy.se.

If you wish to exercise any of your rights as outlined above, you are welcome to contact us at gdpr@sbbnorden.se.

## **Changes to the Policy**

We may occasionally make changes to this Policy. The latest version of this Policy is always available on our website (www.sbbnorden.se).

#### **Contact Information**

If you have any questions about our processing of your personal data, you can contact us at gdpr@sbbnorden.se.