# Privacy policy for job Applications and recruitment

**Privacy policy for job Applications and recruitment**
Version 11, 27.5.2026 13:58

**FDE A/S ("the Organization")**
Lyren 1, Bovmark
6330 Padborg
DK
CVR: 15452986

# Table of Contents

1. Introduction
2. Types of personal data we process about you
3. Purposes for processing the personal data
4. Legal basis for processing personal data
5. Disclosure and transfer of personal data
6. Erasure and retention of personal data
7. Your rights as a data subject
8. Changes to this Policy
9. Contact

# 1. Introduction

## 1.1 Scope

The privacy policy for job applicants in connection with the recruiting process (the ”**Policy**”) describes how the Organization (**"us", "we", or "our"**) collects and processes personal data relating to job applicants as part of the recruiting processes. We are committed to being transparent about how we collect and use your personal data and meeting our data protection obligations.

As a controller, we collect and process personal data about you when we handle your job application and during the recruiting process.

## 1.2 Framework

This Policy is prepared and made available to you to comply with the (EU) General Data Protection Regulation (2016/679 of 27 April 2016) (”**GDPR**”)

# 2. Types of personal data we process about you

## 2.1 General personal data

We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data:

- Address
- CV
- Educational documents
- Email address
- Information from social media that is publicly available and relevant
- IQ and/or personality tests
- Name
- Phone number
- References from former employers

## 2.2 Sensitive personal data

We do not process sensitive personal data, i.e., the special categories of personal data, as defined in GDPR, Article 9(1).

## 2.3 Sources of personal data

As a general rule, we only collect personal data about you directly from you. If specific circumstances allow or require us to collect personal data about you from third parties, we will only do so when relevant and to the extent necessary. We will inform you hereof, which may be done by updating this Policy.

"Personal data is collected from user profiles on different social media, and the sources therefore vary."

## 2.4 Further collection

If we need to collect more personal data than what is specified above, we will inform about this. Such information may be provided by updating this Policy.

# 3. Purposes for processing the personal data

The personal data we collect about you are processed for the following purposes:

- To be able to create and maintain a directory of relevant candidates for positions in our organization
- To collect, process, and store personal data to the extent required under applicable law, including applicable bookkeeping laws
- To process job applications and recruit the relevant candidates

# 4. Legal basis for processing personal data

## 4.1 General personal data

We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal bases:

- The job applicant has given consent to the processing of the personal data for one or more specific purposes.
- The processing is necessary, carried out in the organization's legitimate interests and not overridden by the job applicant's data protection interests or fundamental rights and freedoms.
- The processing is necessary to take steps at the request of the job applicant prior to entering into contracts with the job applicant.

# 5. Disclosure and transfer of personal data

We only transfer personal data to other entities when allowed or required to do so by applicable legislation. Our organization is part of a concern or group of companies, but personal data is not shared between the group companies.

We transfer personal data to countries or international organizations outside the EU/EEA. We transfer Personal Data to the following countries on the basis of the European Commissions adequacy decisions under article 45:

- USA (where the recipient is certified via the EU-US Data Privacy Framework)

As such adequate data protection is guaranteed through legislation or through other measures.

# 6. Erasure and retention of personal data

We ensure that your personal data is deleted when it is no longer relevant for the processing purposes as described above. We always retain personal data to the extent that we have a legal obligation, such as for example in the case of accounting and bookkeeping materials and records.

If you are offered a position and become an employee in the Organization, your personal data from the job application and data from the recruiting process are transferred/moved to our regular HR management system.

If you are not offered a position in the Organization, your personal data is erased after 6 months in accordance with applicable law. Notwithstanding the above, specific reasons related to employment law may necessitate the continuous processing of personal data. This may have different implications. For example, we may process the applications for a longer period to prove that there was no unlawful discrimination in the selection process when we consider this necessary. Similarly, it may be relevant to process the personal data for a limited period if a similar relevant position may become available during this period, or if another candidate opts out of the recruiting process.

If you have any questions about our retention of your personal data, please contact us by using the email mentioned under the last section of this Policy.

If you consent to a longer retention period, we follow such period, for example, if we process the job application in such a limited period to be able to contact you again in case of a suitable vacancy.

# 7. Your rights as a data subject

As a data subject under GDPR, you have a number of rights:

- You have the right to request access to the personal data we process about you, the purposes we process the personal data, and whether we disclose or transfer your personal data to others.
- You have the right to have incorrect information rectified.
- You have the right to have certain personal data deleted.
- You may have the right to restrict our processing of your personal data.
- You may have the right to object to our processing of your personal data based on reasons and circumstances that pertain to your particular situation.
- You have the right not to be subject to a decision based solely on automated means, without human interference unless the decision is necessary for your employment, the decision has a legal basis, or is based on your explicit consent.
- If the processing of your personal data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with a supervisory authority.

Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to for example data portability in the specific situation; it will depend on the circumstances of the processing.

In connection with inquiries concerning your rights, we ask that you provide us with adequate information to process your inquiry, including your full name and your email address, so that we may identify you and respond.

# 8. Changes to this Policy

We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the top of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example on our website or by direct message.

# 9. Contact

You may contact us at the email address below if you:

- disagree with our processing or consider our processing of your personal data infringes on the law,
- have questions or comments to this Policy, or
- want to invoke one or more of your rights as a data subject described in this Policy.

Niels A. Tästensen, nat@fde.dk

We strive to do everything we can to meet your wishes regarding our processing of your personal data and your rights as a data subject. Should you, despite our endeavors, wish to file a complaint, you can do so by contacting the national data protection agency.