# **Privacy Notice (Job applicants – Workable)**

Poio AS ("We", "Us" and "Our") is committed to protecting and respecting your privacy. This privacy notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with Our recruitment processes. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation ("GDPR") the data controller is Poio AS.

We use Workable, an online application provided by Workable Software Limited, to assist with Our recruitment process. We use Workable to process personal information as a data processor on Our behalf. Workable is only entitled to process your personal data in accordance with Our instructions.

Where you apply for a job opening posted by Us, these privacy notice provisions will apply to Our processing of your personal information in addition to, where applicable, other privacy notices or information which has been provided to you separately or is available on Our Website.

### **Your Personal Information**

### Information We collect from you

We collect and process some or all of the following types of information concerning you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, date of birth qualifications, experience, information relating to your employment history, skills and experience that you provide to Us.
- If you contact Us, We may keep a record of that correspondence.
- Details of all actions that you carry out through the use of the services.
- Details of your visits to Workable's Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Workable's Website and the resources that you access.

#### **Information We Collect From Other Sources**

Workable provides Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles. We will only make use of such information if you choose to include reference to your LinkedIn in your application.

Workable's technology allows Us to search various databases (e.g. LinkedIn), which may include your personal data, to find possible candidates to fill Our job openings. Where We find you in this way we will obtain your personal data from these sources.

### **Uses Made Of Your Information**

#### Lawful basis for processing

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the recruitment of staff for Our business.

### **Purposes of processing**

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill Our job openings.
- To help Workable improve their services.

### **How We Store Your Personal Data**

### **Security**

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect your personal data, We cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

#### Where We store your personal data

The data that We collect from you and process using Workable's services may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for Us or for one of our suppliers (e.g. Workable). Such staff may be engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

In particular, your data may be accessible to i) Workable's staff in the USA or ii) may be stored by Workable's hosting service provider on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the United Kingdom and EEA. A data processor

agreement has been signed between Workable Software Limited and its overseas group companies, and between Workable Software Limited and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

If you would like further information please contact Us (see 'Contact' below). We will not otherwise transfer your personal data outside of the United Kingdom or EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

### How long we keep your personal data

We will hold all the data for thirty (30) days following the end of the recruitment process. In certain circumstances, we may ask for your consent to continue retaining your application and personal data so that we can assess you against future available positions. If you decide to give us such a consent, we will retain the application and personal data for the period specified in the consent.

You may at any time ask us to delete your application and personal data before the retention period set out above. We will comply with such a request unless special circumstances apply (e.g. if we are legally obliged to retain the data). You can send us such a request by:

- selecting to delete your application data in Workable; or
- using the contact details below to send us a request per e-mail.

## Your rights

Under the <u>General Data Protection Regulation</u> you have a number of important rights. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this privacy notice is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

• contact us using our Contact details below

- let Us have enough information to identify you,
- let Us have proof of your identity and address, and
- let Us know the information to which your request relates.

# How to complain

We hope that We can resolve any query or concern you raise about Our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the Norway is the Norwegian Data Supervisory Authority, who may contacted at the Information Commissioner who may be contacted https://www.datatilsynet.no/ or telephone: +47 22 39 69 00. If you are currently located outside of Norway, you can find more information about your local supervisory authority and how to contact them at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\_en.htm.

### **Contact**

All questions, comments and requests regarding this privacy notice should be addressed to the person in charge of Our data privacy:

privacy@poio.com

For additional information about Our general use and security of personal data, please feel free to visit our privacy policy https:poio.com/privacy