

# Recruitment Privacy Notice

*Effective date 25<sup>th</sup> May 2018.*

If P&C Insurance Ltd., and its subsidiaries and affiliates (“If”, “us” or “we”), understand that your privacy is important to you. If subsidiaries and affiliates may process your personal data in their capacity as data controllers. We are committed to respecting your privacy and protecting your personal data, which is any information that can identify you as an individual person. This Recruitment Privacy Notice describes how we handle and protect your personal data relating to If’s recruiting processes.

This Privacy Notice only applies to the personal data of job applicants, potential candidates for employment. It does not apply to our employees, contractors or clients, or other personal data that If collects for other purposes.

As used in this Privacy Notice, “personal data” means information that identifies job applicants and potential candidates for employment with us, either submitted as part of the online application and/or through alternative channels (e.g., via professional recruiting firms). We will process your personal data in accordance with this Privacy Notice, unless such processing conflicts with the requirements of applicable law, in which case, applicable law will prevail.

By submitting your personal data to us, you acknowledge that:

- You have read and understood this Privacy Notice and agree to the use of your personal data as set out herein.
- Your personal data may be transferred and processed within the Europeans Union and/or EES-countries, for the purposes and in the manner specified in this Privacy Notice.
- You are not required to provide any requested information to us, but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.
- All of your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.
- This Privacy Notice does not form part of any contract of employment offered to candidates hired by If.

## Personal data we collect

The types of personal data that we request from you and the ways that we process it are determined by the requirements of the country in which the position is located, and not the country in which you reside. Should you apply to more than one location or should the role to which you apply be available in more than one country, the types of personal data we request from you and the ways that we process it are determined by the requirements of all the countries in which the position is located.

We usually collect personal data directly from you when you apply for a role with us, such as your name, address, contact information, work and educational history, achievements, and test results. We also may collect personal data about you from third parties, such as professional recruiting firms, your references, internet and social media<sup>1</sup>, prior employers and If employees.

Sensitive personal data is a subset of personal data and includes ethnicity, health, trade union membership, philosophical beliefs, sexual orientation, as well as other categories as prescribed by law. We do not seek to obtain and will not collect such data about a candidate unless permitted to do so by applicable laws.

## Use of personal data

We collect and use your personal data for legitimate human resources and business management reasons including:

- identifying and evaluating candidates for potential employment, as well as for future roles that may become available;
- recordkeeping in relation to recruiting and hiring;
- ensuring compliance with legal requirements, including diversity and inclusion requirements and practices;
- conducting criminal history checks as permitted by applicable law;
- protecting our legal rights to the extent authorized or permitted by law; or
- emergency situations where the health or safety of one or more individuals may be endangered.

We may also analyze your personal data or aggregated/pseudonymized data to improve our recruitment and hiring process and augment our ability to attract successful candidates.

We process your personal data for the purposes described above: when we have your consent to do so; when necessary to enter into an employment contract with you; when necessary for us to comply with a legal obligation; or when necessary for the purposes of our legitimate interests as an employer operating globally.

We may desire to retain your personal data to consider you for future employment opportunities. In such an event, we will seek your consent, either prior to or after you formally apply for a job opportunity.

## Data recipients and international data transfers

Your personal data may be accessed by recruiters and interviewers working in the country where the position for which you are applying is based, as well as by recruiters and interviewers working in different countries within the If organization. Individuals performing administrative functions and IT personnel within If may also have a limited access to your personal data to perform their jobs. In some countries, you may have fewer rights under local law than you do in your country of residence, but we have put in place legal mechanisms designed to ensure adequate data

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<sup>1</sup> No background checks on social media is done when applying for a job in Finland, unless the candidate him-/herself have sent us a link to his/her LinkedIn profile or another professional profile.

protection of your personal data that is processed by If subsidiaries and affiliates within the If organization, including the transfer of your personal data to countries other than the one in which you reside.

We use third party service providers to provide a recruiting software system. We also share your personal data with other third party service providers that may assist us in recruiting talent, administering and evaluating pre-employment screening and testing, and improving our recruiting practices.

We maintain processes designed to ensure that any processing of personal data by third party service providers is consistent with this Privacy Notice and protects the confidentiality, availability, and integrity of your personal data. Where required by law, we put in place legal mechanisms designed to ensure adequate data protection of your personal data in a third country.

In addition, we may disclose or transfer your personal data in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

## **Retention**

If you accept an offer of employment by us, any relevant personal data collected during your pre-employment period will become part of your personnel records and will be retained in accordance with specific country requirements. If we do not employ you, we may nevertheless continue to retain and use your personal data for a period of time (which may vary depending on the country) for legal recruitments.

## **Security**

We have implemented generally accepted standards of technical and operational security to protect personal data from loss, misuse, alteration, or destruction. Only specific personnel of If and of our third party service providers are provided access to personal data, and these employees and third party service providers are required to treat this information as confidential.

## **Your rights**

We take reasonable steps that are designed to keep your personal data accurate, complete, and up-to-date for the purposes for which it is collected and used. We also have implemented measures that are designed to ensure that our processing of your personal data complies with this Privacy Notice and applicable law.

You may have the right to request access to the personal data that we have collected about you for the purposes of reviewing, modifying, or requesting deletion of the data. You may have the right to request a copy of the personal data we have collected about you and to have any inaccuracies about you corrected. You may also request that we cease processing your personal data (e.g., if you choose to withdraw from our recruiting program), although note that we may need to retain certain personal data where required or permitted to under applicable law.

If you would like to make a request to access, review, or correct the personal data we have collected about you, or to discuss how we process your personal data, please contact us at

[hrnorge@if.no](mailto:hrnorge@if.no) (Norway), [hrsupport@if.se](mailto:hrsupport@if.se) (Sweden), [dkfuhr@if.dk](mailto:dkfuhr@if.dk) (Denmark), [henkilostoasiat@if.fi](mailto:henkilostoasiat@if.fi) (Finland), [konkurss@if.ee](mailto:konkurss@if.ee) (Estonia), [personals@if.lv](mailto:personals@if.lv) (Latvia), [personalas@if.lt](mailto:personalas@if.lt) (Lithuania)

To help protect your privacy and security, we will take reasonable steps to verify your identity before granting you access to your personal data. We will make reasonable attempts to promptly investigate, comply with, or otherwise respond to your requests as may be required by applicable law. Depending upon the circumstances and the request, we may not be permitted to provide access to personal data or otherwise fully comply with your request; for example, where producing your information may reveal the identity of someone else. We reserve the right to charge an appropriate fee for complying with your request where allowed by applicable law.

We do not make recruiting or hiring decisions based solely on automated decision-making.

## CONTACT

If you have any questions about this, please contact us at: [hrnorge@if.no](mailto:hrnorge@if.no) (Norway), [hrsupport@if.se](mailto:hrsupport@if.se) (Sweden), [dkfuhr@if.dk](mailto:dkfuhr@if.dk) (Denmark), [henkilostoasiat@if.fi](mailto:henkilostoasiat@if.fi) (Finland), [konkurss@if.ee](mailto:konkurss@if.ee) (Estonia), [personals@if.lv](mailto:personals@if.lv) (Latvia), [personalas@if.lt](mailto:personalas@if.lt) (Lithuania). If you have any questions concerning our handling of your personal data you may also contact our DPO and the team on [DPO@if.se](mailto:DPO@if.se).