

How Nordnet handles job applicants' personal data

As a potential employer, we seek to be as transparent as possible to our potential employees. We collect and process personal data in order to find the right fit for our open positions and to manage the recruitment process appropriately and in accordance with applicable rules. We process job applicants' personal data, where it is reasonable and proportionate, for carrying out the recruitment process in an efficient manner and for other legitimate interests as described below. It is of great importance to us that we provide thorough information on how we use personal data during the recruitment and that you feel confident that we process your personal data in a legitimate and secure manner.

Data controller and Data subjects

Data controller	Data subjects
Nordnet Bank AB Company reg. no. 516406-0021 Alströmergatan 39 104 25 Stockholm Sweden	You who apply for a specific position at or connect to the candidate pool with Nordnet Bank AB
Nordnet Pensionsförsäkring AB Company reg. no. 516406-0286 Alströmergatan 39 SE-104 25 Stockholm Sweden	You who apply for a specific position at or connect to the candidate pool with Nordnet Pensionsförsäkring AB
Nordnet Fonder AB Company reg. no. 556541-9057 Alströmergatan 39 SE-104 25 Stockholm Sweden	You who apply for a specific position at or connect to the candidate pool Nordnet Fonder AB
Nordnet Livsförsäkring AS Company reg. no. 914 350 956 Akersgata 45 0158 Oslo Norway	You who apply for a specific position at or connect to the candidate pool with Nordnet Livsförsäkring AS

Our data processing

Processing	Purpose	Personal data	Retention	Legal basis
Data collection to recruitment system, recordings of contacts/events during recruitment, and assessment of	To communicate during the recruitment process, to verify submitted recruitment documents to assess appropriate fit for a position, for entering	Identification data (<i>first name, surname, date of birth, age, picture</i>) Contact data (<i>e-mail address, telephone number</i>)	2 years after application Accepted applicants: Regarding employees that work at Nordnet	Legitimate interests

PRIVACY NOTICE to job applicants



suitability for employment.	into an employment agreement and to understand whether an applicant has already applied before for a job at Nordnet.	Professional data (information in CV/cover letter, employment and educational details)	the Privacy Policy for Nordnet's employees will apply and will follow the set retention period. For Germany only: Data is stored for 6 months after rejection.	
Storage of personal test results/profiles	To assess appropriate fit for a position (e.g. internal recruitment or promotion).	Identification data (first name, surname, social security number) Contact data (e-mail address) Personal attributes (personality profile, skills/cognitive test) Financial data (credit reference, payment remarks, debts with the Enforcement Authority) Criminal convictions data (criminal records) Data on personal aspects (previous and ongoing judicial processes) each where in line with applicable local law. For German applicants: This does not apply unless explicitly stated.	Two weeks regarding reports from background controls. 90 days regarding tests results and profiles.	Legal obligation Legitimate interests
Collection and recording of references.	To verify submitted recruitment documents and assess appropriate fit for a position.	Identification data (first name, surname) Contact details (e-mail address, telephone number) Professional data (data in CV/cover letter, employment and educational details)	2 years after application For Germany only: Data is stored for 6 months after rejection.	Legitimate interests
Handling of recruitment related claims	To assess and defend against recruitment related claims, in both extrajudicial and judicial processes.	Identification data (first name, surname, social security number) Contact data (home address, e-mail address and telephone number)	2 years after application For Germany only: Data is stored	Legitimate interests

PRIVACY NOTICE to job applicants



		Professional data (<i>data in CV/cover letter, employment and educational details</i>) Communications (<i>personal data entailed in the communication</i>)	for 6 months after rejection.	
Contacting rejected applicants for job opportunities	To contact rejected applicants within two years in case of relevant job opportunities and where the applicant has consented to such contacts	Identification data (<i>first name, surname, date of birth, age, picture</i>) Contact data (<i>e-mail address, telephone number</i>) Professional data (<i>information in CV/cover letter, employment and educational details</i>)	2 years after application was rejected For Germany only: Data is stored for 6 months after rejection. Candidate pool: Consent can be extended by 6 months at a time to remain in the pool.	Consent

Where we get the personal data from

We collect the personal data from a variety of sources:

- from you, either on specific requests or during the ordinary course of the recruitment;
- from the references that you provide us with;
- from third parties who provide it to us (e.g. information service providers, recruitment agencies); and
- from public registers and online platforms (e.g. LinkedIn)

Whom we share the personal data with

The personal data that we process will be shared with trusted service providers to us. We also share the personal data with administrative authorities and any authorized representative in case of extrajudicial and judicial processes.

Personal data transfer to third countries (i.e. outside of EU/EEA)

We strive to process your personal data within the EU/EEA. As a part of Nordnet's operations, information may be shared with third parties, e.g. entities within the Nordnet corporate group, suppliers (including usage of third-party tools and services), trusted partners and administrative authorities. If we share the personal data with third country vendors, we will in such cases restrict the personal data to data centers within the EU/EEA if possible and also rely on the following transfer mechanisms, separately or combined:

- European Commission's adequacy decisions;

- approved Binding Corporate Rules;
- officially adopted Standard Contractual Clauses; or
- other valid transfer mechanisms.

The chosen transfer mechanism(s) is accompanied by supplementary safety measures of technical and organizational nature suitable for mitigating any risk that is not efficiently mitigated by the transfer mechanism(s) at hand. Nordnet shall take appropriate and relevant contractual, technical, and organizational measures to ensure that suppliers, both in and outside of the EU/EEA, handle personal data in a secure and correct manner in compliance with applicable privacy regulations and Nordnet's privacy and security policies.

More about legitimate interest as our legal basis

We always carry out legitimate interest assessments in relation to the processing activities that are rested on this legal basis. Such assessment include a necessity evaluation and a weighing of interests. We have concluded that our interests in processing your personal data for the purposes as specified above takes precedence over your potential privacy interests and the associated impacts, based on the benefits that these processing activities provide for.

Rights as a data subject

a) Right to access

You have the right to know if we are processing your personal data and in such case get information about what personal data we are processing about you.

b) Right to rectification

If you find any of your personal data subjected to our processing to be incorrect or incomplete, you have the right to request amendment or supplementation of that personal data.

c) Right to erasure

You have the right to have your personal data deleted. However, this is not applicable in certain cases, e.g. if the retention of the personal data is mandatory to fulfil legal obligations or if we are relying our processing on legitimate interest and we have compelling justification for the processing.

d) Right to limitation of data processing

Under certain conditions, you have the right to limit our processing of your personal data to certain selected purposes or restrict our processing during a limited time period.

e) Right to data portability

You have the right to obtain your personal data in a structured way or request it to be sent to a third party. However, this right is limited to the personal data that you have provided us yourself and which we are processing on the basis of your consent or our contractual relationship.

f) Right to object

You can object to further processing of your personal data. However, this is not applicable in certain cases, e.g. if we can demonstrate compelling legitimate reasons for the processing that override the individual's interests, rights and freedoms or if the processing is carried out in order to establish, exercise or defend against legal claims. You always have the right to object whenever our data processing is based on your given consent or whenever your personal data is being used for direct marketing purposes.

g) Right to lodge a complaint

If you are dissatisfied with our data processing, you may lodge a complaint to the competent supervisory authority.

How to exercise your rights

You can send your request to: dataprotection@nordnet.se.

For safety reasons, please do not include your social security number or any other special category/integrity sensitive data in your e-mail to us!

Contact details for questions or complaints

Nordnet's HR department

E-mail: HR@nordnet.se

Nordnet's data protection officer

E-mail: dataprotection@nordnet.se

The main authorities for Nordnet's supervision regarding Data Protection are:

Swedish Authority for Privacy Protection

Postal address:

Integritetsskyddsmyndigheten
Box 8114
SE-104 20 Stockholm

E-mail: imy@imy.se

Website: www.imy.se

Norwegian Data Protection Authority

Postal address:

Datatilsynet
P.O. Box 458 Sentrum
NO-0105 Oslo

E-mail: postkasse@datatilsynet.no

Website: www.datatilsynet.no

Other local Data Protection Authorities can also be contacted for questions or complaints.