

Eupry's Applicant Privacy Notice

Eupry ApS CVR.: DK30536665 Hejrevej 28, DK-2400, Copenhagen NV

("We", "Us") are 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 Eupry ApS.

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.

When you apply for a job opening posted by Eupry ApS, these Privacy Notice provisions will apply to Our processing of your personal information. In addition, since you would have applied from Our website, the general Privacy Notice for the Eupry Website visitors will also apply, as well as the Workable [Privacy Policy](#).

When you apply for a job opening via the application function on a job site or similar online service provider ("Partner"), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner's Privacy Notice.

Your Personal Information

Information we collect from You

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

1. 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, telephone number, date of birth, qualifications, experience, information relating to your employment history, skills experience that you provide to Us, as well as your video in case you conduct your

interview using the Video Interview feature. If you contact Us, We may keep a record of that correspondence.

2. A record of your progress through any hiring process that We may conduct.
 - 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.
3. 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.

Workable's technology allows Eupry to search various databases – some publicly available and others not, which may include your personal data (including your CV or Resumé), 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.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for Our business more generally.

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 Our service providers (such as Workable and its processors and data providers) and Partners (such as the job sites through which you may have applied) improve their services. More details on how Workable uses data in order to

support service providers' and Partners' service improvements may be found in the Workable privacy policy.

Disclosure of Your Information

As set out above, We pass your information to Our third-party service providers, including Workable, who use it only in accordance with Our instructions and as otherwise required by law.

How We Store Your Personal Data

Where We store your personal data

Where We store your personal data in Our own systems, it is stored in the European Economic Area ("EEA").

The data that We collect from you and process using Workable 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. 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.

Workable relies on the Standard Contractual Clauses (SCCs), as approved by the European Commission with its decision of 4th June 2021 for data transfers to its sub-processors that are located in the US and between the entities of the Workable Group of companies. Workable complies with the obligations imposed by the new EU SCCs to the data importer, as such to apply technical and organizational measures, to complete a DTIA (Data Transfer Impact Assessment) and can provide the warranties required under the SCCs to make sure the data subjects receive an equivalent level of protection as provided under GDPR.

Workable is committed to the security of all the data it processes and implements different controls across a number of security domains. Their goal is to secure their cloud-based platform, so they have processes in place to ensure that our product is secure both for customers and users. They are contractually obligated to have in place appropriate technical and organizational measures to safeguard personal data, such as strong encryption, and to follow the industry's best security practices e.g they are ISO 27001 certified.

How long We keep your personal data

Your data will be erased once it is no longer needed, no later than 3 months after the position you have applied for has been closed.

Your personal information will be deleted before the deadline expiration on one of the following occurrences:

1. deletion of your personal information by you.
2. receipt of a written request by you to us.

Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. 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 Danish Data Protection Act 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 the right to lodge a complaint with the Danish Data Protection Authority.

Contact

All questions, comments, and requests regarding this Privacy Notice should be addressed to uko@eupry.com

References

General Data Protection Regulation: <https://gdpr.eu/>

Danish Data Protection

Act: <https://www.datatilsynet.dk/media/7753/danish-data-protection-act.pdf>

Workable Privacy Policy: <https://www.workable.com/privacy>

Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council (Text with EEA relevance):

<https://op.europa.eu/en/publication-detail/-/publication/55862dbf-c72b-11eb-a925-01aa75ed71a1>

ISO 27001: <https://www.iso.org/isoiec-27001-information-security.html>