

## PRIVACY NOTICE – RECRUITMENT

### 1 INTRODUCTION

In connection with the recruitment process in Ørsted ('we', 'us', or 'our'), we collect and process personal data about you. When we receive personal data about you, we aim to ensure that you trust we will process your personal data in a transparent and secure manner.

### 2 DATA CONTROLLER

The legal entity responsible for the processing of your personal data is the company under the Ørsted Group which has the vacant position that is to be filled. The specific company will either appear from the job advertisement or from a separate message to you from a Talent Acquisition Partner in Ørsted. You can also find an overview of our companies in our [annual report](#).

If you are not sure who is the data controller in respect of the processing of your personal data, please feel free to contact us as described in section 3.

### 3 CONTACT

You can always contact Ørsted by sending an email to [recruitment@orsted.dk](mailto:recruitment@orsted.dk) if you have any questions about the processing of your personal data or if you wish to exercise your rights as described in section 8.

Ørsted's German companies Ørsted Wind Power Germany GmbH and Ørsted Markets GmbH have appointed a data protection officer (DPO). If you are involved in a recruitment process in one of these companies, you can contact the data protection officer by sending an email to [dataprotectionDE@orsted.de](mailto:dataprotectionDE@orsted.de).

### 4 DESCRIPTION OF PROCESSING

In the following, we have described the personal data we process about you, the purposes for which we process your personal data as well as the basis for processing in connection with a recruitment process in Ørsted.

#### 4.1 Assessment of your application

The purpose of our processing of your personal data is to assess you in relation to the position you are applying for in Ørsted.

First, you must create a candidate profile in the recruitment system in order to apply for a job with Ørsted. This applies irrespective of whether you wish to apply for an advertised position or a position in our graduate programme, our trainee programme or in one of our other career programmes. With the candidate profile, you can upload application material to the position(s) you wish to apply for. You can access and make changes to your candidate profile and the material you upload in the recruitment system at any time.

In connection with your application for a vacant position with Ørsted, we process the personal data which you enter in your candidate profile and submit with your application material (e.g. CV and other appendices). This will mainly concern generic personal data such as identification and contact details, including name, age, nationality, address, email address and telephone number as well as educational and career information, including details regarding educational background and results, information about current and former employer(s), work experience and performance as well as competences and qualifications. On our career portal, we also collect necessary cookies (IP addresses) which help make the website usable.

If you are invited to an interview during the recruitment process, we will also process personal data about you which are written down in the form of notes in connection with the job interview, for example regarding our impression of you, your motivation for applying for a position in Ørsted and your expectations of the job. Our processing of your personal data as described above takes place on the basis of Article 6(1)(b) of the General Data Protection Regulation (GDPR) on entering into a contract.

If, in connection with your application for a vacant position in Ørsted, you indicate that our Talent Acquisition Partners may use your personal data to assess you in relation to another position in Ørsted, we may also process your personal data for this purpose. In such case, our processing of your personal data for this purpose will be based on Article 6(1)(f) (the balancing of legitimate interests) of GDPR. Our legitimate interest lies in our ability to assess you with a view to recruiting you for another relevant position.

During the recruitment process, we may ask you to complete a personality and/or aptitude test, and if so, we will process the results of these tests. Our processing of these personal data takes place on the basis of your consent given under Article 6(1)(a) of GDPR.

As a general rule, we do not process sensitive personal data about you. If you apply for a position in Denmark or in Germany, however, we may in special cases ask you to provide information about any current or past illnesses or diseases if this will have a significant impact on your work capacity in the position in question. In such case, we will process the data under Article 9(2)(b) of GDPR, see section 2 of the Danish Act on the Use of Health Data (*Helbredsoplysningsloven*) (Denmark) and section 26(3) of the German Federal Data Protection Act (*Bundesdatenschutzgesetz (BDSG)*) (Germany).

Finally, we may process personal data about you which we collect through social media searches (e.g. LinkedIn) to the extent that they are publicly available. Our processing of your personal data will be based on Article 6(1)(f) (the balancing of legitimate interests) of GDPR. Our legitimate interest lies in our ability to assess you in relation to the position for which you are a candidate.

## 4.2            References

If you are among the final candidates for a position with Ørsted, we may, subject to your permission, collect references from current or previous employer(s) which you have indicated, for example in your CV.

In such case, we will process the personal data which we receive about you in connection with our collection of references, including generic personal data related to your duties, your work tasks and your performance at the employer(s) in question as well as information on your professional and personal qualifications. The purpose of collecting references is to obtain confirmation of the information we have received from you and the impressions we have got of you during the recruitment process.

Our processing of these personal data takes place based on Article 6(1)(f) (the balancing of legitimate interests) of GDPR, where our legitimate interest lies in our ability to process the data as part of the overall assessment of whether you are the right candidate for the position.

#### 4.3            Background check

For individual positions in Ørsted, the performance of a background check is a condition for obtaining employment. In special cases, we may therefore ask you for permission to perform a background check of you for the purpose of ensuring that the information we have received about you during the recruitment process is correct and for assessing whether you are worthy of the respect and trust which the position requires.

Depending on the position which you are being offered, we will process generic personal data about you in connection with the background check. The personal data relates to your work background and profile, including confirmation of the correctness of the information you have provided. In addition, we may process personal data about you which are publicly available, including information about any directorships and board memberships as well as any exclusions therefrom, registrations in international databases regarding money laundering, fraud, terrorism, blacklisting and similar ('Global Watch List') as well as information about financial matters.

Depending on the position which you are being offered, we may also process your personal data regarding any criminal convictions and/or offences. In such case, we will ask you to present your criminal record certificate.

Our processing of your personal data in connection with a background check takes place on the basis of your consent given under Article 6(1)(a) and Article 9(2)(a) of GDPR.

## **5**            **RECIPIENTS OF PERSONAL DATA**

We do not share your personal data with other companies in the Ørsted Group, unless you have given separate permission for your personal data to be shared with other Talent Acquisition Partners in Ørsted. In such case, your personal data may be disclosed to other companies in the Ørsted Group in connection with a recruitment process for another position which we deem may be relevant for you.

We may *pass on* your personal data to external suppliers and business partners (data processors) which provide us with services related to the recruitment process. This may, for example, be providers of recruitment systems, test providers and providers of other IT

solutions.

## 6 TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

If the recruitment process concerns a position in an Ørsted company within the EU/EEA, we will generally not transfer your personal data to countries outside the EU/EEA. An exception to this is if you have specifically indicated that your personal data may be shared between companies in the Ørsted Group.

The transfer of your personal data to countries outside the EU/EEA will be based on the European Commission's standard contractual clauses. You can get a copy of these contractual clauses by contacting Ørsted as described in section 3.

## 7 STORAGE OF PERSONAL DATA

We store your personal data for as long as it is necessary and relevant to pursue the purposes described. In general, we store your personal data until the vacant position for which you are a candidate has been filled and the recruitment process has been completed.

If you take up the vacant position, the information is transferred to your personnel folder. If your application for a position is rejected, your information will be stored for up to six months after the recruitment process has been completed, after which it will be erased. In addition, your candidate profile will automatically be deleted when it has been inactive for six months.

Any information which we process in connection with a background check is erased immediately after the background check has been completed.

## 8 YOUR RIGHTS

You have the following rights in relation to the processing of your personal data:

- You have the right of access to, rectification or erasure of your personal data.
- You also have the right to have the processing of your personal data restricted.
- **You have the right to object to the processing of your personal data if we process your personal data based on Article 6(1)(f) (the balancing of legitimate interests).**
- If the processing of your personal data is based on consent, you have the right to withdraw your consent at any time. Your withdrawal of consent will not affect the lawfulness of the processing performed before withdrawal of your consent.
- You have the right to receive the personal data that you have provided yourself in a structured, commonly used and machine-readable format (data portability).
- You have the right to lodge a complaint with a data protection authority. In Denmark, this authority is the Danish Data Protection Agency. You can find the contact details for the Danish Data Protection Agency and the procedure for lodging a complaint at [www.datatilsynet.dk](http://www.datatilsynet.dk).

You can exercise your rights by contacting us via [recruitment@orsted.dk](mailto:recruitment@orsted.dk).

Your rights may be subject to conditions or restrictions. For example, you may not have the right to data portability in the case in question. It depends on the specific circumstances in connection with the processing activities.

## **9 AMENDMENTS**

This Privacy Notice replaces all previous versions. It will be necessary to update and amend this Privacy Notice on an ongoing basis, and we thus reserve the right to update and change it. In the event of material amendments, you will be notified if we find it necessary.

Last updated: 31 August 2020

-0-