

Privacy Policy

for applicants and recruitment

Danish Shipping
Amaliegade 33
1256 Copenhagen K
Company reg. no.: 67797817
(hereinafter referred to as “**us**”, “**we**”, “**our**” and “**Danish Shipping**”)

1. Purpose

- 1.1 The purpose of this Privacy Policy is to inform applicants about how Danish Shipping processes personal data in connection with recruitment and employment. The Policy describes the personal data we collect, how the data is used, the legal bases on which the processing is based, how long the data is retained, and the rights you have under data protection legislation. The Policy is intended to ensure openness and transparency regarding our processing of personal data and to ensure that you, as an applicant, are informed about how we handle your data throughout the recruitment process.
- 1.2 The Policy has been prepared and made available in order to comply with the General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016) (the “GDPR”) and its rules on the duty to provide information.

2. Personal data we collect about you

- 2.1 Ordinary personal data: We process personal data about you where relevant and in accordance with applicable law. Depending on the specific circumstances, the personal data processed may include the following types of personal data:

- Address
- Application
- CV
- Email address
- Date of birth
- Name
- Publicly available and relevant information from social media
- References from previous employers
- Telephone number

A Danish civil registration (CPR) number is processed only where necessary in connection with employment or to comply with legal requirements.

- 2.2 Depending on the circumstances, and where strictly relevant and necessary, we may process special categories of personal data (also known as “sensitive personal data”) about you. This personal data includes:

- Information about a person’s trade union membership

If we need to collect and process personal data in addition to that specified above, we will inform you at the time of collection. Such information may also be provided by updating this Policy.

- 2.3 As a general rule, we collect personal data about you directly from you. If, in special circumstances, we collect personal data about you from other sources, we will notify you, including by updating this Policy.
 - 2.4 If we need to collect and process personal data in addition to that specified above, we will inform you at the time of collection. Such information may also be provided by updating this Policy.
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3. Purpose of processing your personal data

- 3.1 To administer the recruitment process, assess candidates' qualifications, conduct interviews, obtain references, communicate with applicants, and document the recruitment process

4. Legal basis for processing your personal data

- 4.1 We process your ordinary personal data only where we have a lawful basis for doing so in accordance with the GDPR. Depending on the specific circumstances, personal data is processed on the basis of the following legal grounds:
- Where we have asked for your consent to process specific personal data, the legal basis for processing that personal data is your consent, cf. Article 6(1)(a) of the GDPR.
 - The processing is necessary for compliance with applicable law, cf. Article 6(1)(c) of the GDPR, and/or for compliance with employment-law obligations under legislation or collective agreements, cf. section 12(1) of the Danish Data Protection Act.
 - The processing is necessary for the purposes of a legitimate interest, except where your interests or fundamental rights and freedoms requiring the protection of personal data override that interest, cf. Article 6(1)(f) of the GDPR and section 12(2) of the Danish Data Protection Act, respectively.
 - The processing is necessary for the performance of or entry into a contract to which you are a party, cf. Article 6(1)(b) of the GDPR.
- 4.2 Where relevant and necessary, sensitive personal data (the "special categories of personal data" specified in Article 9(1) of the GDPR) is processed. In such cases, processing will take place only where permitted under Article 9(2)-(4) of the GDPR and, where relevant, pursuant to section 12 of the Danish Data Protection Act on processing in the employment context. Processing may take place, among other circumstances, in the following case:
- After obtaining your explicit consent in accordance with Article 9(2)(a) of the GDPR.

You may withdraw your consent at any time by contacting us using the contact details provided at the end of this Policy. If you withdraw your consent, the personal data processed on the basis of that consent will be deleted unless it may or must continue to be processed, for example to comply with a legal obligation. Withdrawal of your consent does not affect the lawfulness of processing carried out before the consent was withdrawn.

5. Disclosure and transfer of personal data

- 5.1 In connection with the recruitment process, your personal data may be shared with relevant managers and employees of Danish Shipping who take part in assessing applications, conducting interviews, and making the final hiring decision. The data is processed only to the extent necessary for the specific recruitment process.
- 5.2 In some recruitment processes, Danish Shipping uses external suppliers that assist with the operation, support, and administration of IT systems, HR solutions, recruitment tools, and other administrative systems. These suppliers process personal data solely on Danish Shipping's instructions and on the basis of data processing agreements that ensure an appropriate level of protection for your personal data. You will be informed in advance if your recruitment process involves sharing data with external suppliers.
- 5.3 Where relevant to the specific recruitment process, Danish Shipping may obtain references from previous employers or other persons whom you have identified as references. References are obtained in accordance with applicable law and generally accepted practice in this area.
- 5.4 Danish Shipping may disclose personal data to public authorities, courts, or other third parties where required by law or necessary for the establishment, exercise, or defence of legal claims; however, this is not standard practice.
- 5.5 As a general rule, Danish Shipping does not transfer personal data to recipients outside the EU/EEA. If such a transfer is exceptionally necessary, it will take place only in accordance with applicable data protection legislation and subject to the necessary safeguards.
- 5.6 You are always welcome to contact Danish Shipping if you would like further information about the recipients or categories of recipients to whom your personal data may be disclosed.

6. Retention and deletion

Danish Shipping retains personal data only for as long as necessary for the purposes for which it was collected, or for as long as retention is required under applicable law.

- 6.1 If you are hired, relevant personal data from the recruitment process will be transferred to Danish Shipping's HR administration systems and subsequently processed in accordance with our employee privacy policy.
 - 6.2 If you are not hired, Danish Shipping will generally retain your personal data for up to six months after the recruitment process has ended. The purpose is, among other things, to document the recruitment process and handle any employment-law or discrimination claims. The data will then be deleted.
 - 6.3 If you have any questions about our retention and deletion of personal data, you are welcome to contact us using the contact details in section 9.
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7. Your rights

As a data subject, you have a number of rights under data protection legislation. The rights that may be relevant in connection with Danish Shipping's processing of your personal data are described below. Exceptions or restrictions may apply to these rights depending on the specific circumstances.

- 7.1 You have the right to request access to the personal data we process about you, including information about the purposes of the processing, the categories of personal data, and any recipients of the data.
- 7.2 You have the right to have inaccurate or incomplete personal data about you rectified.
- 7.3 In certain cases, you have the right to have personal data about you erased if we no longer have a lawful basis for processing it.
- 7.4 In certain cases, you have the right to restrict the processing of your personal data so that we only retain the data for a specified period.
- 7.5 In certain cases, you have the right to object to our processing of your personal data where the processing is based on our legitimate interests.
- 7.6 In certain cases, you have the right to receive the personal data that you have provided to us in a structured, commonly used, and machine-readable format and to have that data transferred to another controller where the applicable conditions are met.
- 7.7 Where our processing of your personal data is based on your consent, you have the right to withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before the consent was withdrawn.
- 7.8 You have the right not to be subject to a decision based solely on automated processing, including profiling, where the decision produces legal effects concerning you or similarly significantly affects you, unless permitted under applicable law.
- 7.9 If you disagree with our processing of your personal data, you have the right to lodge a complaint with the Danish Data Protection Agency. Further information about the complaints procedure is available on the Agency's website.
- 7.10 If you wish to exercise one or more of your rights, you may contact us using the contact details in section 9. To process your request, we may ask for information that enables us to identify you.

8. Changes to the Policy

- 8.1 We reserve the right to update and amend this Policy. If we amend the Policy, we will change the date and version at the top of the document. In the event of material changes, we will provide notice by means of a prominent notice on our website, by email, or through other means of communication.

9. Contact

- 9.1 If you have any questions about Danish Shipping's processing of your personal data or this Privacy Policy, you are welcome to contact us:

Danish Shipping

Amaliegade 33
1256 Copenhagen K

Email: GDPR@danishshipping.dk

- 9.2 If you wish to exercise one or more of your rights under data protection legislation, including the rights of access, rectification, erasure, restriction of processing, data portability, or objection, you may contact us using the contact details above. To process your request, we may ask for additional information to verify your identity.

- 9.3 If you are dissatisfied with our processing of your personal data, we encourage you to contact us first so that we have an opportunity to address your enquiry.

You also have the right to lodge a complaint with the Danish Data Protection Agency:

Danish Data Protection Agency

Carl Jacobsens Vej 35
2500 Valby
www.datatilsynet.dk

- 9.4 We endeavour to respond to enquiries concerning personal data and data subjects' rights as soon as possible and within the time limits prescribed by data protection legislation.
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