



APPLICANT PRIVACY NOTICE (GDPR COMPLIANT)

1. PURPOSE

Your privacy is important to VOS (the “Company”) and we work to ensure that your personal data remains under your control. We ensure lawful, fair and transparent processing of your data. We process personal data in accordance with the applicable EU and Member State regulations on data protection, in particular, the General Data Protection Regulation. As part of any recruitment process, the Company collects and processes personal data relating to job applicants. This Privacy Notice sets out, in line with GDPR, the types of data that we hold on you as an applicant and how we collect and handle your personal data. The following is an account of how we use personal information, how long we keep that data and to meeting its data protection obligations. The Company is committed to processing your data lawfully, securely and transparently.

2. DATA CONTROLLER AND CONTACT INFORMATION

The Company is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows: VOS Destination Management ApS, Masnedøgade 20, 1, DK-2100 København Ø, Denmark, job@vos.to

3. DATA PROTECTION PRINCIPLES

The Company will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

4. WHAT TYPES OF PERSONAL DATA DO WE USE?

In connection with your application, we will collect, store, and use the following categories of personal data about you:

- The data you have provided to us in your CV and cover letter. We urge you not to include any sensitive personal data (data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, gender, biometric data, criminal record, or data concerning health, sex life or sexual orientation (Article 9 GDPR)) in your application, CV and attachments.
- Any other data that you have provided in our application form, including name, title, address, telephone number, personal email address, references and attachments, such as diplomas, transcripts, languages, computer skills.
- Any data you provide to us during an interview.

5. HOW DO WE COLLECT YOUR PERSONAL DATA?

- We collect data about candidates in a variety of ways and this will usually start when we undertake a recruitment exercise where we will collect the data from you, as a candidate directly. This includes the information you would normally include in a CV or an Application cover letter.
- Information may be obtained from your identity documents, or collected through interviews or other forms of assessment, including online tests.
- Further information will be collected from your named references, from whom we collect the following categories of data: full name, periods of previous employment, performance during previous employment.
- From publicly accessible sources (such as LinkedIn, etc.), where we collect your full name, email, work history, and other data included on your profile.

6. WHY DO WE PROCESS YOUR PERSONAL DATA?

We will use the personal data we collect about you to:

- Assess your skills, qualifications, and suitability for the role
- Carry out background and reference checks, where applicable
- Communicate with you about the recruitment process
- Keep records related to our hiring processes
- Comply with legal or regulatory requirements

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint a suitable candidate to that role. We also need to process your personal data to decide whether to enter into a contract with you.



Having received your CV and cover letter and the results from any tests you took, we will then process that data to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is suitable to invite you for an interview. If we decide to call you for an interview, we will use the data you provide to us at the interview to decide whether to offer you the role.

7. IF YOU FAIL TO PROVIDE PERSONAL DATA

If you fail to provide personal data when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application further. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

8. HOW DO WE USE SENSITIVE PERSONAL DATA?

We will use your particularly sensitive personal data, if provided, in the following ways:

- We will use data about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview
- We will use data about your nationality or ethnicity, to assess whether a work permit and a visa will be necessary for the role

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process sensitive personal data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

9. HOW DO WE SHARE YOUR PERSONAL DATA?

Your data will be shared with colleagues within the Company, where it is necessary for the purposes of processing your application or with your former employers for reference requests. We do not allow our third-party service providers to use your personal data for their own purposes.

10. HOW DO WE SECURE YOUR PERSONAL DATA?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. We store all the personal information you provide on secure servers. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. If we share your data with third parties, we ensure that your data are held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

11. HOW LONG DO WE STORE YOUR PERSONAL DATA?

The information will be automatically deleted within 6 (six) months after rejection or immediately if the application is irrelevant to the job requirements. We will securely destroy your personal data in accordance with our data retention policy. In case a similar role becomes vacant for which you will be a fitting candidate, we will ask for your explicit consent to retain your personal data for more than 6 months.

12. AUTOMATED DECISION-MAKING

No decision will be made about you solely based on automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

13. YOUR RIGHTS

You are at any time eligible to get access to the information we have on you, however, with certain legal exceptions. The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- You are at any time entitled to by a written request to receive information about our processing activities that concern your personal data, e.g. which information we have registered about you, the processing purpose, the categories of personal data concerned and the recipients to whom the information have been or will be disclosed (Articles 13 and 14 GDPR).
- You are entitled to obtain from us confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access to the personal data and certain related information (Article 15 GDPR).



- You have the right to have inaccurate personal data about you rectified by us without undue delay, and to complete any incomplete personal data (Article 15 GDPR). If you become aware that there are errors in the information we have registered about you, we urge you to contact us in writing in order for us to rectify the information.
- You have the right to have your personal data deleted by us without undue delay if, for instance, we no longer have a valid processing purpose, you withdraw your consent, we have no other legal basis for processing your personal data or when certain legal conditions apply (Article 17 GDPR).
If we can prove or demonstrate compelling, legitimate reasons for continued processing which precede your interests, rights and freedoms or the processing is necessary for a legal claim to be established, exercised or defended, we are not obliged to delete your personal data.
- You have the right to restrict our processing of your personal data when certain legal conditions are met, e.g. if you contest the accuracy of your personal data (Article 18 GDPR).
- You have the right to object to processing of personal data on grounds relating to your particular situation, at any time to processing of personal data concerning you, when certain legal conditions are met (Article 21 GDPR). If you object to processing, we will no longer process your personal data unless we can demonstrate compelling, legitimate reasons for continued processing which precede your interests, rights and freedoms or the processing is necessary to establish, exercise or defend a legal claim.
- You have the right to receive the personal data provided to us in a structured, commonly used and machine readable format and to transfer these data to another data controller without our hindrance, when certain conditions are met (Article 20 GDPR).
- You are at any time for reasons concerning your particular situation entitled to object to our processing of your personal data if the processing, for example, is based on legitimate interests or profiling
- You have the right not to be subject to automated decision-making, including profiling, based on the processing of your personal data, insofar as this produces legal or similar significant effects on you, when certain conditions are met (Article 22 GDPR).

14. WITHDRAWAL OF CONSENT

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. We will then delete your information unless we can continue the processing on a different basis (e.g. to comply with legal or regulatory requirements).

15. CONTACT

To revoke your consent and for any questions or requests relating to this Applicant Privacy Policy, please contact job@vos.to or write us on the following address: VOS Destination Management ApS, Masnedøgade 20, 1 DK-2100, København Ø Denmark

16. RIGHT TO COMPLAIN

You are at any time entitled to file a complaint to a supervisory authority about our processing of your personal data. The Danish supervisory authority is the Danish Data Protection Agency ("Datatilsynet"), Borgergade 28, 5, 1300 København K.