

## **Job Applicant Privacy Notice**

Thank you for your interest in a career opportunity with Adcendo. As part of our recruitment process, we collect and process personal data relating to job applicants. This notice explains what data we collect, how we use it, with whom we share it, and your rights—depending on your country of residence.

We are committed to handling your personal data responsibly and in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR) and applicable U.S. privacy laws.

### **1. Who We Are**

We are:

#### **Adcendo ApS**

Nordre Fasanvej 215  
2000 Frederiksberg, Denmark  
CVR: DK38780093

As the Data Controller, we are responsible for ensuring that your personal data is handled in compliance with applicable data protection laws. For any inquiries regarding your personal data, you may contact our Data Protection Officer at [DPO@adcendo.com](mailto:DPO@adcendo.com).

### **2. What Personal Data We Collect**

Depending on your location and the nature of the role, we may collect and process the following types of personal data:

- Identity and contact details (e.g., name, phone number, email address, postal address)
- Professional and employment information (e.g., CV/resume, cover letter, education history, qualifications, work experience)
- Job preferences and expectations (e.g., salary expectations, notice period)
- Information obtained during interviews or assessments
- Results of background checks (where legally permitted)
- Publicly available professional information (e.g., LinkedIn profile)
- Voluntary demographic information (e.g., gender, nationality) for diversity and inclusion purposes
- Accessibility-related health information, if provided by you for the purpose of reasonable accommodations

### **3. How We Use Your Information**

We process your personal data for the following purposes:

- To evaluate your suitability for a role
- To manage and communicate with you during the recruitment process
- To assess qualifications, experience, and fit for the position
- To comply with applicable legal or regulatory obligations
- To maintain a talent pool, with your consent, for future roles

#### 4. Who We Share Your Data With

Your personal data may be shared internally within Adcendo with hiring managers, HR personnel, and other relevant stakeholders involved in the recruitment process. Additionally, we may share your data with trusted third parties where necessary and appropriate to support the recruitment and potential onboarding process. These may include:

- Third-party recruiters or staffing agencies assisting with the recruitment process
- Providers of applicant tracking systems (ATS) and other recruitment platforms
- Providers of background screening, assessment, or testing services
- IT service providers supporting our recruitment infrastructure
- Legal, regulatory, or governmental authorities only where required by law

**If your potential employment involves cross-border arrangements** (e.g., remote work from another country or relocation), we may also share relevant personal data with external tax advisors — such as **Deloitte** or similar professional services firms — to:

- Assess tax residency status and compliance obligations
- Provide you with relevant information about potential **tax, social security, or employment implications** of working across borders

These providers are contractually obligated to maintain the confidentiality and security of your data and only process it for the specified purposes.

#### 5. International Data Transfers

If your personal data is transferred outside your country of residence (e.g., to the United States from the EU), we implement appropriate safeguards to ensure that your data remains protected. These may include:

- Standard Contractual Clauses approved by the European Commission
- Transfers to countries deemed to provide adequate levels of data protection

#### 6. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes outlined in this notice:

- If you are hired, your data will become part of your employee file.
- If you are not hired:
  - **In the EU:** We retain your data for up to 6 months after the conclusion of the recruitment process, in accordance with Art. 6(1)(f) GDPR.
  - **In the United States:** We retain your data for as long as necessary to comply with legal obligations and for potential defense against legal claims.

If you have provided consent, we may retain your data for a longer period to inform you of future opportunities.

## 7. Your Rights

### EU:

Under GDPR, you have the right to:

- Access your personal data
- Rectify inaccurate or incomplete data
- Erase your data (“right to be forgotten”)
- Restrict or object to the processing of your data
- Withdraw consent (where applicable)
- Data portability
- File a complaint with your local Data Protection Authority

To exercise your rights, please contact us at: [DPO@adcendo.com](mailto:DPO@adcendo.com)

### United States:

Depending on your state of residence, you may have the right to:

- Know what personal information we collect and how we use it
- Access and delete your personal information
- Request correction of inaccurate information
- Opt out of the sharing of personal data
- Non-discrimination for exercising your rights

For California residents, these rights are provided under the California Consumer Privacy Act (CCPA), as amended by the CPRA. You may contact us via [DPO@adcendo.com](mailto:DPO@adcendo.com)

## 8. Legal Basis for Processing

The legal bases for processing your personal data vary depending on your location:

**For applicants in the EU:**

<b>Purpose</b>	<b>Legal Basis</b>
Assessing your application	Art. 6(1)(b) GDPR
Fulfilling legal obligations	Art. 6(1)(c) GDPR
Legitimate interests (e.g., recruitment efficiency, internal reporting)	Art. 6(1)(f) GDPR
Retaining data for future roles	Art. 6(1)(a) GDPR (consent)

**For applicants in the United States:**

We process personal data based on your consent, our legitimate interest in assessing candidates, and as necessary to comply with applicable U.S. federal and state employment and data protection laws (e.g., California Consumer Privacy Act (CCPA), as amended by the CPRA).

**9. Automated Decision-Making**

We do not use automated decision-making or profiling during the recruitment process.

**10. Contact**

If you have any questions or concerns about this notice or how we process your personal data related to applying for jobs, please contact:

- **Email:** [DPO@adcendo.com](mailto:DPO@adcendo.com) or [HR@adcendo.com](mailto:HR@adcendo.com)