

## PRIVACY NOTICE FOR RECRUITMENT

### SNELLMAN ADVOKATBYRÅ AB

This privacy notice details the processing of personal data conducted by Snellman Advokatbyrå AB, reg. no. 556757-2101 (“**Snellman**”) in connection with the recruitment process.

#### **1 Data controller and contact details**

Snellman is the data controller for the purposes of this privacy notice.

If you have any questions regarding Snellman’s processing of your personal data or if you wish to exercise your rights related to your personal data, please contact us at [privacy@snellman.com](mailto:privacy@snellman.com).

#### **2 Categories of personal data and relevant sources**

Snellman will process the following categories of personal data relating to an applicant for the purposes described in section 3 below:

- **Identity and contact details** (name, date of birth, e-mail address, phone number, personal identity number, gender and, if applicable, LinkedIn profile);
- **Merits** (such as employment history, degree, academic grades, completed courses, certificates, diplomas and language skills);
- **Interview and tests** (notes from interviews and, if applicable, test results);
- **Job preferences** (if applicable: job category, preferred position and/or business area and salary expectation);
- **Permits** (if applicable: residence and work permit); and
- **Other information** relating to the applicant which the applicant decides to disclose to Snellman (e.g. provided in the cover letter or information from references).

As part of our recruitment process, we may also carry out appropriate background checks to assess an applicant’s suitability for the role. These checks are conducted in compliance with applicable laws and are proportionate to the nature of the position applied for.

The above personal data is primarily obtained directly from an applicant when applying for a position at Snellman. Snellman may also collect personal data relating to an applicant from external sources such as official registers, references, digital platforms (e.g. LinkedIn) or other third-party service providers.

### 3 Purposes and legal bases for processing

Snellman processes the personal data detailed above for the following purposes:

#### To carry out the recruitment process

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>• Identity and contact details</li> <li>• Merits</li> <li>• Interview and tests</li> <li>• Job preferences</li> <li>• Other information</li> <li>• If applicable, information from a background check</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in carrying out the recruitment process.</p> <p><i>Contract.</i> For applicants that are offered a position at Snellman, it is necessary to process <i>Identity and contact details</i> to prepare the employment agreement.</p>
	<p><b>Exemption for special categories of data</b></p>
	<p>N/A</p>
<p><b>Retention period</b></p>	
<p>Open applications: The personal data is retained <u>24 months</u> after the filing date of the application.</p> <p>Specific positions: The personal data is retained <u>24 months</u> after the recruitment process for which the application has been sent or has been closed, whichever is later.</p> <p>If the applicant is hired, a longer retention period applies in accordance with our internal privacy notice for employees.</p>	

#### To comply with legal obligations

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>• Identity and contact details</li> <li>• Permits</li> </ul>	<p><i>Legal obligation.</i> The processing is necessary to fulfil our legal obligations within the field of employment.</p>
	<p><b>Exemption for special categories of data</b></p>
	<p>N/A</p>
<p><b>Retention period</b></p>	
<p>Please refer to the retention period stated for “To carry out the recruitment process”.</p>	

**To send information on future career opportunities at Snellman and/or invitation to events**

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>Identity and contact details</li> </ul>	<i>Consent.</i> The personal data will be processed based on your consent.
	<b>Exemption for special categories of data</b>
	N/A
<b>Retention period</b>	
The personal data will be retained until you have withdrawn your consent or at an earlier time at our initiative.	

**To establish, exercise or defend legal claims**

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>To the extent relevant, all categories of personal data listed in this privacy notice.</li> </ul>	<i>Legitimate interest.</i> The processing is necessary to pursue our legitimate interest in establishing, exercising, or defending legal claims (e.g. in the event of a discrimination claim or other legal proceeding).
	<b>Exemption for special categories of data</b>
	N/A
<b>Retention period</b>	
The personal data is retained during the period necessary to establish, exercise or defend the legal claim. Personal data for this purpose is not stored for longer than ten years from the end of the legal process in question.	

**4 Disclosure to third parties**

The applicant’s personal data may be shared with our IT service providers for purposes such as data storage, application management, and communication. In certain cases, we may also disclose the applicant’s personal data to third parties when required by the recruitment process (e.g. to verify qualifications or permits).

Before any data is shared with third parties, Snellman ensures that recipients are subject to appropriate data security and confidentiality obligations, as required by law. Where we engage data processors to act on Snellman’s behalf, we have entered into the necessary data processing agreements.

In exceptional cases, Snellman may disclose your personal data to public authorities or legal counsel, for example, in cases of suspected criminal activity or misconduct, or when otherwise required by law.

Your personal data will be processed within the European Economic Area (“EEA”) and EEA based services. Snellman’s supplier may, however, occasionally need to transfer the applicant’s personal data, either directly or indirectly, to recipients located outside the EEA. Where such transfers occur, they will only be carried out when necessary for the purposes outlined in this privacy notice. Any transfer of personal data outside the EEA

will be based on an adequate level of protection, either through an adequacy decision by the European Commission or, in the absence thereof, through appropriate safeguards as required under applicable data protection laws. These safeguards may include the use of the European Commission's Standard Contractual Clauses, complemented by supplementary technical and organisational measures where necessary to ensure a level of protection essentially equivalent to that guaranteed within the EEA.

## 5 Security measures

Snellman takes appropriate technical and organisational measures against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data in accordance with our internal security procedures covering the storage and destruction of personal data as well as access to personal data. We regularly check our security policies and procedures to ensure our systems are secure and protected. Access to your personal data is limited to personnel who need it for the purposes outlined above.

## 6 Your rights and how to exercise them

As a data subject, you have certain rights regarding the processing of your personal data. To exercise these rights as outlined below, please submit your request to [privacy@snellman.com](mailto:privacy@snellman.com).

<b>Access</b>	You may request confirmation whether personal data about you is processed by us and, if that is the case, access your personal data and additional information regarding the operation, such as the purposes of the processing. You are also entitled to receive a copy of the personal data undergoing processing.
<b>Object to certain processing</b>	You have the right to object to the processing of your personal data based on a legitimate interest for reasons which concern your particular situation. In such a situation, we will stop using your personal data where the processing is based on a legitimate interest, unless we can show that the interest overrides your privacy interest or that the use of your personal data is necessary to manage or defend legal claims.
<b>Rectification</b>	You have the right to obtain from us the rectification of inaccurate personal data concerning you.
<b>Erasure</b>	You may have your personal data erased under certain circumstances, such as when your personal data is no longer needed for the purposes for which it was collected.
<b>Restriction of processing</b>	You may ask us to restrict the processing of your personal data to only comprise storage of your personal data under certain circumstances, such as when the processing is unlawful, but you do not want your personal data erased.
<b>Withdrawal of consent</b>	You have the right to at any time withdraw your consent to the processing of personal data to the extent the processing is based on your consent.

<b>Data Portability</b>	You have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used, and machine-readable format and ask for the information to be transferred to another data controller (where possible).
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Click [here](#) to read more about the rights that you have in relation to the processing of your personal data.

Please note that if we restrict or delete your personal data, this may result in us not being able to continue the recruitment process or provide you with the communications and invitations described above.

You are also entitled to submit a complaint to the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten) regarding Snellman's processing of your personal data.

## **7 Changes to this privacy notice**

We may amend this privacy notice from time to time to reflect changing legal requirements or our processing practices. We will keep you informed of such updates where appropriate.