

## RECRUITMENT

TASK	TYPES OF PERSONAL DATA	PURPOSE	LEGAL BASIS	STORAGE PERIOD	RECIPIENTS
Application, CV and supporting documents	<p>Applicants:</p> <ul style="list-style-type: none"> <li>- Personal data (non-sensitive)</li> <li>- Special categories of personal data (non-sensitive)</li> <li>- Confidential personal data</li> </ul>	<p>The personal data are processed for the purpose of assessing whether the applicant is a qualified candidate for the position in question.</p> <p>Application, CV and supporting documents are stored so that the applicant may be considered for potential future positions relevant to the applicant's profile.</p> <p>If the applicant is selected for the position, the application, CV and related attachments will be stored in order to document the employment history.</p>	<p>Personal data (non-sensitive) are processed for the purpose of assessing whether the applicant is a qualified candidate for the position. Personal data (non-sensitive) about applicants are processed on the basis of point (f) of Article 6(1) of the General Data Protection Regulation ("GDPR").</p> <p>The applicant consents to Poul Schmith's storage of application, CV and related attachments so that the applicant may be considered for potential future positions relevant to the applicant's profile, see point (a) of Article 6(1) of the GDPR.</p> <p>If Poul Schmith chooses to employ the applicant in question, we will process personal data about the applicant to the extent necessary prior to conclusion of a contract, see point (b) of Article 6(1) of the GDPR.</p> <p>As a general rule, Poul Schmith will not collect special categories of personal data (sensitive) about applicants. However, it cannot be excluded that an application or a CV received from an applicant will contain special categories of personal data (sensitive). In this case, the data are processed on the basis of point (f) of Article 9(2) of the GDPR.</p> <p>To the extent that the application contains national identification number or any other identifier of general</p>	<p>If the applicant is not selected for the position applied for, the applications and related attachments will be deleted six months after receipt of the application.</p> <p>If the applicant agrees, the application, CV and related attachments will be stored for six months after receipt of the application if the applicant wishes to be considered for other positions.</p> <p>If the applicant is selected for the position, the application, CV and related attachments will be deleted not later than five years after the end of employment.</p>	<p>Poul Schmith only discloses your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the matter. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. Examples include the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>

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			application, such numbers are processed on the basis of paragraph (3) of section 11(2) of the Danish Data Protection Act ( <i>databeskyttelsesloven</i> ).		
Criminal record certificate	Applicants: – Personal data (non-sensitive) – Confidential personal data	<p>The purpose of gaining insight into the candidate's criminal record is to assess the candidate's suitability for the job.</p> <p>The applicant will only be asked to present a private criminal record certificate if the applicant is offered employment.</p> <p>The purpose is furthermore for Poul Schmith to comply with its obligations under the Danish Anti-Money Laundering Act (<i>hvidvaskloven</i>) for pre-employment screening in order to prevent employees from abusing their position for money laundering and terrorist financing or complicity therein.</p>	<p>The processing of personal data (non-sensitive) is necessary for Poul Schmith's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest is the assessment of the applicant's suitability for the position.</p> <p>Information about criminal offences is processed for the purpose of pursuing a legitimate interest, see section 8(3), second sentence of the Data Protection Act, cf. Article 10 of the GDPR. The legitimate interest is security considerations, which requires an assessment of the applicant's suitability for the position.</p> <p>The pre-employment screening of future employees is based on point (c) of Article 6(1) of the GDPR and section 8 of the Anti-Money Laundering Act.</p> <p>The processing of data about the applicant's national identification number or any other identifier of general application is based on paragraph (3) of section 11(2) of the Data Protection Act.</p>	<p>The criminal record certificate will be deleted not later than three months after receipt.</p> <p>If HR receives a hardcopy version of a criminal record certificate, the criminal record certificate will be shredded when the information has been entered in the employee's basic database. The criminal record certificate will be deleted not later than three months after receipt.</p>	<p>Digitally collected criminal record certificates will be disclosed to the data processor.</p> <p>Poul Schmith will only disclose your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the matter. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. Examples include the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose</p>

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					of establishing, exercising or defending a legal claim.
Searches on the Internet, including social media	<p>Applicants:</p> <ul style="list-style-type: none"> <li>– Personal data (non-sensitive)</li> <li>– Special categories of personal data (non-sensitive)</li> </ul>	<p>Personal data are processed for the purpose of assessing whether the applicant is a qualified candidate for the position in question.</p> <p>Special categories of personal data (sensitive) are processed to a limited extent and only if the applicant him/herself has made the data public.</p> <p>Searches on social media are not part of the standard recruitment procedure, and the data will only be collected to the extent that they are deemed relevant to the recruitment process.</p>	<p>The processing of personal data (non-sensitive) is necessary for the data controller's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. Poul Schmith pursues a legitimate interest in preparing for job interviews.</p> <p>Special categories of personal data (sensitive) are only processed when the data are clearly published by the applicant, see point (e) of Article 9(2) of the GDPR.</p>	<p>The data are deleted not later than one month after the recruitment process is completed.</p>	<p>Poul Schmith will only disclose your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the matter. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. Examples include the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>

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Video surveillance (CCTV)	Applicants: – Personal data (non-sensitive)	<p>In risk zones, there will be motion-controlled video surveillance. The objective is to prevent and detect criminal offences, such as vandalism and burglary.</p> <p>CCTV surveillance has been installed in the reception area, by the entrance doors and in lift lobbies, among other places.</p> <p>There are no cameras in the conference rooms where job interviews are held.</p>	<p>The processing is necessary for Poul Schmith's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR.</p> <p>The legitimate interest is security considerations, including to prevent and detect vandalism and burglaries.</p> <p>Information about criminal offences is processed for the purpose of pursuing a legitimate interest, see section 8(3) of the Data Protection Act, cf. Article 10 of the GDPR. The legitimate interest is security considerations, including to detect vandalism and burglaries.</p>	<p>CCTV footage is deleted after 30 days. Footage may be stored for a longer period if the footage is required for a specific dispute. In such case, the person involved in the dispute will be notified.</p>	<p>Poul Schmith only discloses your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the matter. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. Examples include the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>
Job agent	Applicants: – Personal data (non-sensitive)	If the applicant has signed up for job agents, personal data will be processed	The applicant consents to Poul Schmith's processing, including storage	The personal data are processed until the applicant's active deregistration	Poul Schmith only discloses your personal data to external parties if

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		for the purpose of submitting e-mails with job offers within the categories selected by the applicant.	and contact, see point (a) of Article 6(1) of the GDPR.	from the service.	<p>necessary and if there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the matter.</p> <p>Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. Examples include the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>
Personality tests	Applicants: – Personal data (non-sensitive)	Personality tests taken in connection with the recruitment process are used as a dialogue tool during the recruitment process.	Poul Schmith will process personal data (non-sensitive) from the applicant's completed personality tests on the basis of point (f) of Article 6(1) of the GDPR,	Personality tests taken during the recruitment process will be deleted six months after completion of the test.	Poul Schmith will only disclose your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public

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		Personality tests are offered if the results of the test may be relevant to discuss in relation to the position in question.	as the data are relevant to the recruitment decision.		authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the matter. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. Examples include the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.
References from previous employers	Applicants: – Personal data (non-sensitive)	Your personal data are processed for the purpose of assessing whether the applicant is a qualified candidate for the position in question.	The applicant consents to Poul Schmith contacting one or more specific persons for the purpose of obtaining references and in this connection	Applicants who are not offered a position will have their data deleted not later than six months after the recruitment process has ended.	Poul Schmith will only disclose your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public

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			processing the applicant's personal data, see section 12(3) of the Data Protection Act.	If the applicant is selected for the position, the data will be deleted not later than five years after the end of employment.	authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the matter. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. Examples include the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.
Preboarding	Applicants: – Personal data (non-sensitive)	When employing a new employee, Poul Schmith will submit information about the employment and the history of the firm. This takes place on the basis of the	The processing of personal data for the purpose of submitting relevant material to the new employee is based on point (f) of Article 6(1) of the GDPR, as such	Preboarding is part of Poul Schmith's HR system, Empl. Personal data are automatically deleted five years after the end of employment.	Poul Schmith only discloses your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public

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		contact information already registered by us about the person concerned in connection with the application process.	processing takes place for the purpose of the employee's commencement of employment in the firm.		authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the matter. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. Examples include the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place pursuant to Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.

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ACTION	AUTHOR	APPROVED BY	DATE OF APPROVAL	VERSION
Updating of address details in footer	MLGA	MLGA	17 December 2025	1.7
Updating of form regarding compliance with the duty of information.	MLGA	MLGA/SDFR	10 November 2025	1.6
Updating of form regarding compliance with the duty of information.	SDFR/MLGA	SDFR	10 October 2024	1.5
Updating of compliance form relating to requirements under the Danish Anti-Money Laundering Act.	PNTH	SDFR	16 June 2023	1.4
Updating of information on disclosure	LBEN	SDFR	22 November 2022	1.3
Updating of form regarding compliance with the duty of information.	SDFR	SDFR	17 August 2022	1.2
Updating of form regarding compliance with the duty of information.	LBEN/SDFR	KURE	17 March 2022	1.1
Drafting of form for compliance with the duty of information	MSKO	JNO	7 July 2020	1.0