

# Eimskip Ísland ehf.

## Applicant Privacy Policy

Eimskip Ísland ehf. is committed to maintaining the reliability, confidentiality and safety of job applicants' personal data. This privacy policy describes how the company collects and processes personal data of job applicants.

This privacy policy applies to the personal data of all individuals who apply for a job at Eimskip. This privacy policy also refers to job applicants as "**you**" and to the company as "**us**".

### 1. Purpose and compliance with law

Eimskip is committed to comply with applicable data protection legislation at all times. This privacy policy is based on the Icelandic Act no. 90/2018 on the protection of privacy as regards the processing of personal data, ("**Data Protection Legislation**"), as amended.

### 2. What is personal data?

In this privacy policy, personal data is any information relating to an identified or identifiable individual, i.e. information that can be traced directly or indirectly to a specific individual. Anonymous data and information which does not relate to an identified or identifiable individual is not considered personal data.

### 3. Personal data collected and processed by Eimskip

We collect and maintain different types of personal data about our applicants. The data processed may depend on the nature of the job you are applying for.

The following are examples of data collected and processed by Eimskip:

- contact details, including name, ID number, address, telephone number and e-mail;
- gender;
- citizenship
- permit to work in ESB countries
- job application;
- CV and information on education, training and work experience;
- data from references and recruitment agencies as applicable; and
- data from job interviews, if applicable.

Regarding certain positions, we may request information on whether you have a driver's licence and if it comes to hiring a clean criminal record, confirmation of citizenship (passport) and permit to work in ESB countries may be requested to be presented.

Additionally, Eimskip may collect and process other data, which you provide to Eimskip during the application process.

As a general rule, we collect personal data directly from applicants. Where personal data is collected from third parties, we will endeavor to notify you.

If you are offered a position at Eimskip we might, regarding certain positions, ask for a copy of, or information from your criminal record, a copy of your driver's license, a copy of passport, work permit and a copy of your diploma, before entering into a contract of employment with you.

#### **4. Why do we collect personal data and on what grounds?**

The personal data we collect about you are primarily used to assess your qualifications for the job position you have applied for.

The processing is necessary in order to take steps at your request prior to entering into an employment contract.

The processing of your criminal record and confirmation of citizenship is based on Eimskip's legitimate interests and, where applicable, so Eimskip can comply with a legal obligation to which it is subject.

In selected circumstances we might require your consent to the processing of certain specific data, in relation to the retention period of the data, or in relation to the transfer of your job application to Eimskip's subsidiaries. In such cases you can always withdraw your consent.

If you fail to provide the necessary data we may be unable to consider your job application.

#### **5. Access to personal data and transfer to third parties**

Your personal data will only be accessible by our human resource department and the supervisors and managers of the position you have applied for.

Eimskip may share your personal data with your referees or recruitment agencies in relation to the recruitment process. In connection with our IT services we have engaged data processors and your personal data might be stored or made accessible in connection with such services.

These third party service providers may be located outside of Iceland. Eimskip will not transfer personal data outside the European Economic Area unless such transfer is permitted under applicable data protection legislation.

#### **6. How do we protect and safeguard your personal data?**

Eimskip endeavours to take appropriate technical and organisational measures to protect your personal data. These measures are intended to protect your personal data from accidental loss or change, and unauthorised access, copying, use, or disclosure.

Electronic data on the recruitment process, including job applications, are stored in our access restricted software. Paper data are stored in a locked storage.

#### **7. Data retention**

Eimskip endeavours to erase your personal data six months after the applicable application deadline. We endeavour to erase unsolicited applications six months from the date of submission, in case you are not offered a position at Eimskip. We may ask for your consent for longer retention period.

If you are offered a position at Eimskip we will transfer your personal data to an electronic employee file. A special privacy policy applies to the processing of our employees' personal data.

#### **8. Changes and rectification of personal data**

It is important that the data we process is both accurate and current. If your personal data happens to change during the application process, it is important that you keep us informed of such changes.

Please direct all changes to Eimskip's human resource department.

## **9. Your rights regarding your personal data**

You have the right to access and, in certain circumstances, to get a copy of the personal data undergoing processing, as well as information about the processing.

In certain instances you may also have the right to have your personal data erased, or to have us restrict the processing. You also have the right to have your personal data rectified, if the data are wrong or inaccurate.

You may also have the right to receive your personal data, which you have provided to us in a machine-readable format or the right to have us transmit those data directly to a third party.

Your rights are however not absolute. Laws or regulations may authorise or oblige us to reject your request of exercising your rights.

## **10. Inquiries and complaints to the data protection authority**

If you wish to exercise your rights described in sections 8 and/or 9, or if you have any questions about this privacy policy or how we process your personal data, please contact Eimskip's data protection team.

If you are unsatisfied with our processing of your personal data you are entitled to make a written submission to the Icelandic Data Protection Authority ([www.personuvernd.is](http://www.personuvernd.is)).

## **11. Contact information**

Eimskip's data protection team supervises compliance with this privacy policy. The team's contact information:

Eimskip's data protection team: [privacy@eimskip.com](mailto:privacy@eimskip.com)

Eimskip's contact information:

Eimskip Ísland ehf.  
Sundabakka 2  
104 Reykjavík

## **12. Revisions to this privacy policy**

Eimskip may make changes to this privacy policy to reflect changes to our legal or regulatory obligations or how we process personal data. A revised version of this privacy policy will be made available on Eimskip's application website, or communicated in another verifiable manner.

Any changes to this privacy policy will be effective from the time the revised version is published on Eimskip's application website.

This privacy policy was published on June 28<sup>th</sup>, 2018. Last updated on April 6<sup>th</sup> 2021.