

PRIVACY POLICY FOR APPLICANTS AND EMPLOYEES

1. GENERAL INFORMATION

- 1.1. This document contains a policy statement regarding We.Care Health A/S (“we”, “us” or “our”) collection, use and processing of Personal Data (“Privacy Policy”). The Privacy Policy is applicable when the Company processes Personal Data about applicants and employees.
- 1.2. We are the data controller for the processing of your personal data and are thus responsible for ensuring that your personal data is processed in accordance with the data protection legislation in force from time to time.
- 1.3. In the privacy policy, we inform you about your rights and how we process and protect your personal data. If you have any questions about our processing of your personal data, you are always welcome to contact us:

We.Care Health A/S

CVR-nr.: 39825406

Address: Svanemøllevej 17, 2., 2100 København Ø

Telephone.: 60703335

E-mail: hello@we.care

2. PROCESSED DATA

Applicants

- 2.1. When you apply for a position with us, we collect and process the personal data that you have submitted in your application or otherwise provide to us in connection with the recruitment process:

2.1.1.General personal data:

- Identity and contact details: first and last name, date of birth, gender, private address, e-mail, telephone number and a picture of you, if this is included in the application;
- Information about your educational background, graduate certificates, certificates of authorization, previous employments, and other information contained in your resume;
- Information included in our correspondence with you

2.1.2.References:

- Information obtained from references, as we have an interest in finding the most suitable candidates for a job with us;

2.1.3.Personality test:

- Information related to personality tests. The purpose of the test is to shed light on your personal competencies so that we have a starting point for a dialogue about your personal resources and behavioral preferences. The test will never



stand alone, but will be part of the overall basis for the selection of the right candidate for the position;

2.1.4. Other information

- Information about your CPR number to ensure a unique identification of you when we need to report information about your salary, etc. in accordance with the rules in the Tax Act on reporting obligations.
- Criminal record

Employees

2.2. If you are employed by us, we collect and process – in addition to personal data as mentioned in section 2.1 – the following types of personal data about you in connection with your employment:

2.2.1. General personal data:

- Employment contract
- Salary, bank account, tax information and pension matters;
- Minutes of employee development interviews;
- Information about working hours, holidays, sickness, maternity leave, leave, any occupational injuries and other absences;
- Information about termination of employment, including possible dismissal or expulsion.

2.2.2. Sensitive personal data:

- Health conditions (occupational injuries, sick leave, including opportunity statements and medical certificates, information about maternity leave in connection with reimbursement of unemployment benefits or employment on special terms, e.g. in case of disability).

3. PURPOSE OF PROCESSING

3.1. We process your personal data for the following purposes:

- A. Recruitment of employees
- B. To be able to administer the employment relationship, including being able to register and store the information that is necessary and relevant in relation to your employment with us.

4. AUTOMATED INDIVIDUAL DECISIONS, INCLUDING PROFILING

4.1. Your personal data is not subject to automated processing.

5. BASIS FOR TREATMENT

5.1. In the following, for each processing purpose, you can see on what basis we process your data:

Activity	Purpose	Basis for processing
Receipt of applications, CV, etc. and conducting interviews: Personal data mentioned under section 2.1.1.	Recruitment of employees: Point A above.	The legal basis for the processing of personal data included in an application, CV or similar is Article 6(1)(f) of the General Data Protection Regulation on processing necessary for a legitimate interest not exceeded by the interests of the data subject. Our processing of data that you entrust to us on your own initiative is also considered to take place with your consent, cf. Article 6(1)(a) of the Data Protection Regulation.
References: Personal data mentioned in section 2.1.2.	Recruitment of employees: Point A above.	The legal basis is the consent you give for the reference collection, cf. Article 6(1)(a) of the General Data Protection Regulation.
Personality test: Personal data mentioned in section 2.1.3.	Recruitment of employees: Point A above.	The legal basis for the processing of personal data included in a personality test and the result of the test is your consent, cf. Article 6(1)(a) of the General Data Protection Regulation. You can withdraw your consent at any time, after which we will no longer be allowed to process the information in the future. However, if we have another legal basis for processing the information, we will still be able to process it. Furthermore, a withdrawal of consent will not affect the lawfulness of processing carried out by us prior to the withdrawal.
Personal data mentioned in sections 2.1.1 and 2.2.1.	In order to administer the employment relationship, including being able to register and store the information necessary and relevant in relation to your employment with us: Point B above.	The legal basis for our collection and registration of personal data is Article 6(1)(b) of the General Data Protection Regulation on processing necessary for the performance of a contract to which the data subject is a party or the conclusion of a contract with the data subject.

CPR number	<p>Recruitment of employees: Point A above.</p> <p>In order to administer the employment relationship, including being able to register and store the information necessary and relevant in relation to your employment with us: Point B above.</p>	<p>The legal basis for the processing of your CPR number – when you are employed – is the rules in the Tax Act on reporting obligations and section 11(2)(1) of the Data Protection Act.</p> <p>When we register information that is required under the Danish Bookkeeping Act or as part of the reporting obligation to the tax authorities, the legal basis is section 6(1) of the Danish Data Protection Act, cf. Article 6(1) (c) of the General Data Protection Regulation on processing necessary to comply with a legal obligation that is the responsibility of the data controller.</p>
Criminal record	<p>Recruitment of employees: Point A above.</p> <p>In order to administer the employment relationship, including being able to register and store the information necessary and relevant in relation to your employment with us: Point B above.</p>	<p>The legal basis is the consent you give for the purpose of obtaining a criminal record, cf. Article 10 of the Data Protection Regulation.</p>
Health information	<p>To process certain information about you in the context of personnel management: Point B above.</p>	<p>Health data is processed on the basis of Article 9(2)(b) of the General Data Protection Regulation about obligations in the field of employment.</p>

6. RECIPIENTS

6.1. We may share and disclose your personal data to the following relevant recipients:

- Tax authorities and other authorities in connection with statutory reports
- Salary administrator, pension funds, banks and insurance companies
- The National Board of Industrial Injuries (reports of occupational injuries), Municipalities concerning unemployment benefit reimbursement, Virk.dk, Income Register, DA-Maternity leaves.
- Our accountant;
- External advisors, lawyers, etc.;
- Our data processors on the basis of the data processing agreements

6.2. We disclose your personal data to the above recipients because we are either required to do so or because the above must process your personal data in connection with your employment with us. The recipients only have access to the personal data to the extent that

it is appropriate in relation to what the personal data is to be used for. Furthermore, the recipients are obliged not to disclose the data to anyone or to use it for purposes other than their purpose of receipt

- 6.3. The following recipients are established outside the EU/EEA. Therefore, the specified precautionary measures in the table below will be taken when your data is transferred. For further information, please contact us.

Recipient / category of recipients	Third country not ensuring an adequate level of protection	Precautionary measure applied
Google	USA	EU-Commission Standard Contractual Clauses (SCC)
LinkedIn	USA	EU-Commission Standard Contractual Clauses (SCC)

7. RETENTION

- 7.1. If your application is rejected, we will generally delete the information about you that we have processed in connection with the recruitment process when the recruitment process is completed. This will typically coincide with the time when an employment contract has been concluded with the selected candidate, and as a rule a maximum of 6 months after the time when you have been rejected.
- 7.2. If you are hired, the information we have processed in connection with the recruitment process will, as appropriate, be stored on the personnel file in accordance with our guidelines. We store your personal data until there is no longer an objective need for continued storage of these, and here we take special account of the deadlines in the Limitation and Book-Keeping Act. In connection with termination of the employment relationship, we store the personal data about you for up to five (5) years after you have stopped working with us.

8. YOUR RIGHTS

- 8.1. You have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to you free of charge twice (2) every calendar year. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.
- 8.2. If information about you changes, you must inform your immediate manager about this so that the changes can be recorded.
- 8.3. You have the right to restrict the Processing of your Personal Data, if
- i. you have questioned the accuracy of the Personal Data,
 - ii. the Processing is unlawful, and you have requested a restriction of the Processing
 - iii. we no longer need your Personal Data for the original purpose, but we need it to establish, exercise or defend rights, or
 - iv. an assessment of what legitimate interest is the most important in connection with pending request for the erasure of Personal Data

- 8.4. If the Processing is based on the legal grounds, consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controller.

9. CONTACT INFORMATION

- 9.1. If you wish to exercise your rights or have any questions regarding our processing of your personal data, please contact us. Our contact information can be found at the top of this policy. Once we have received your inquiry, we will investigate whether it is possible to meet your request. We will give you an answer as soon as possible and no later than one month after we have received your inquiry.
- 9.2. If you wish to complain about our processing of your personal data, please submit your complaint to the competent local supervisory authority. You can read more about the local supervisory authorities at the following link: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

10. NOTICE OF CHANGES TO THE PRIVACY POLICY

- 10.1. If we make changes to this Privacy Policy, we will notify you. If the changes require your consent, we will provide you with additional, separate notice under the circumstances and request your consent in accordance with applicable personal data legislation.
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