# Information concerning the processing, by Skandinaviska Enskilda Banken AB (Spółka Akcyjna) – Oddział w Polsce, of personal data of candidates for employment

The General Data Protection Regulation ((EU) 2016/679) ("GDPR") is designed to protect individuals' integrity from being violated when their personal data is used. An important aspect of the privacy protection is that the person whom the data concerns is informed of how it is being processed.

This document explains how Skandinaviska Enskilda Banken AB (Spółka Akcyjna) – Oddział w Polsce processes personal data relating to candidates for employment.

### **Controller of personal data**

The controller of your personal data is Skandinaviska Enskilda Banken AB (Spółka Akcyjna) – Oddział w Polsce with its registered office in Warsaw at ul. Żelazna 51/53 ("Bank").

It is necessary to process your personal data in connection with the recruitment process.

Your failure to provide the required personal data could be an obstacle in considering your application in the recruitment process. Giving your personal data is voluntary to the extent to which personal data is collected on the basis of your consent.

#### **Contact details**

Should you have any questions regarding the manner and scope of processing of your personal data by the Bank, and also the rights to which you are entitled, please get in touch with the Bank as the controller or with the Data Protection Officer appointed by the controller.

You can get in touch with the controller by writing to Skandinaviska Enskilda Banken AB (Spółka Akcyjna) – Oddział w Polsce, ul. Żelazna 51/53, 00-841 Warsaw, Poland, with a note:"Personal data" or by calling (22) 395 80 00.

You can get in touch with the Data Protection Officer by e-mail to <a href="mailto:dpopoland@seb.se">dpopoland@seb.se</a> or by writing to Data Protection Officer, Skandinaviska Enskilda Banken AB (Spółka Akcyjna) – Oddział w Polsce, ul. Żelazna 51/53, 00-841 Warsaw, Poland.

#### Categories of personal data we process

The Bank processes the following categories of your personal data:

- identification data (e.g. name, surname);
- contact details (e.g. e-mail address, telephone number);
- information about the history of employment with other employers;
- information on education and qualifications;
- information obtained from competency surveys or other similar surveys;
- face image captured in a photo;
- information concerning a conviction with a final judgment for offenses;
- other information that you provided to us on your own initiative or with your consent;
- other, when it is necessary to exercise a right or fulfill an obligation resulting from applicable law.

# Purposes and basis for processing your personal data

1. The Bank processes your personal data above all in order to:

- a) conduct the recruitment process and perform other activities aimed at preparing for the conclusion of an employment contract or commission contract concluded;
- b) fulfil the Bank's legal obligations, including in particular those resulting from the Labor Code;
- c) obligations other than those stated above (provided one of the circumstances below exists), and which are necessary to carry out the Bank's legitimate interests, including in particular:
  - a) in order to determine claims, pursue them or defend against them;
  - b) for our internal administrative purposes;
  - c) to prevent and detect crime and abuse and to ensure data security.
- 2. In other cases, your personal data will be processed on the basis of previously granted consent, to the extent and for the purpose specified in that consent.

### Source of origin of personal data

Your personal data has been obtained directly from you or from the Bank's employees under the referral program or from the Bank's recruitment partners. Your data may also be obtained publicly accessible sources, including from the Internet.

# Recipients of personal data

Your personal data may be made available to the following recipients or categories of recipients:

- a) public administration authorities and entities performing public tasks or acting on the order of public authorities, to the extent and for purposes arising from applicable law, in particular the National Labour Inspection, President of the Personal Data Protection Office;
- b) other entities legally authorized to receive your data on the basis of applicable law;
- c) entities or authorities to which this data can be transferred on the basis of consent or authorisation;
- d) entities entrusted by the Bank with the processing of personal data on the basis of concluded contracts, e.g. IT and other service providers processing data on behalf of the Bank:
- e) entities connected with the Bank, including within the SEB group (<a href="https://sebgroup.com/about-seb/our-locations">https://sebgroup.com/about-seb/our-locations</a>), in connection with carrying out reporting obligations.

### Period of processing personal data

Your personal data will be processed:

- a) to conduct the recruitment process for the duration of the recruitment process for the stated position and, after its completion, for the period and to the extent required to pursue our possible claims or defend ourselves against any claims (including the limitation period);
- b) to fulfill our statutory obligations until the end of the legal obligation to keep them;
- c) to carry out the Bank's legitimate interests as data controller as long as we have a legitimate interest to process the data or until you object to such processing, if there are no legitimate legal grounds for us to continue to process the data;

d) if we process data on the basis of your consent (including in the case of your consent to the processing of data for the purposes of future recruitment processes)- until you withdraw your consent.

### Your rights

You have the right to access your personal data processed by the Bank. Should any information concerning you be incorrect or incomplete, you will be entitled to access that data and ask for it to be corrected.

## You also have the right to:

- 1. request the removal of your personal data in cases specified in the GDPR;
- 2. request restricting the processing of your personal data in cases specified in the GDPR;
- 3. withdraw your consent if the Bank obtains such consent to process personal data (withdrawing consent shall not affect the lawfulness of processing based on consent before its withdrawal);
- 4. transfer personal data if: (i) processing is done on the basis of an agreement concluded with you or on the basis of consent granted by you, and (ii) processing is done in an automatised manner;
- 5. object to the processing of personal data, including profiling, if there are reasons connected with your particular situation and data is processed in the public interest or the Bank's legitimate interests, as referred to above.

# Transfer of personal data outside the European Economic Area ("EEA") or to international organisations

As we operate internationally, your personal data may be shared to jurisdictions outside of the European Union/ EEA and to international organisations. For all personal data transfers, we will apply the appropriate due diligence and assurance activities to ensure an essentially equivalent level of protection.

For transfers to countries outside EEA or to international organisations for the purposes stated in this document, we will rely on:

- 1. that the European Commission has decided that there is an adequate level of protection in the country in question;
- 2. suitable protection measures, such as standard contract clauses;
- 3. contractual arrangements.

You have the right to obtain a copy of information on the safeguards used for the transfer of your personal data to a country outside EEA or to international organisation by contacting the Bank or the Data Protection Officer (contact details are indicted above).

#### Right to lodge a complaint with a supervisory authority

If you believe that the Bank's processing of your personal data breaches the GDPR, you have the right to lodge a complaint with the appropriate supervisory authority i.e. President of the Personal Data Protection Office.

### Automated decision making, including profiling

Your personal data will not be subject to automated decision making or profiling.