

Privacy policy for the processing of personal data for recruitment purposes and when contacting potential candidates

We at Balder care about your privacy and are continuously working to improve the protection of your personal data. In this policy, we describe how we process your personal data when you apply for a job with us or are in contact with us for a possible recruitment.

If you have any questions about our processing of your personal data or if you want to exercise your rights as described below under the heading "*Your rights in relation to our personal data processing*", you are welcome to contact us at dataskydd@balder.se.

Data controller

The company where you apply for employment or apprenticeship is the data controller for the processing of your personal data in the context of the recruitment process. See [Appendix 1](#) for the list of companies that are part of our group. It is always clearly stated in the advertisement which company the position or apprenticeship refers to. If you are not applying for a specific position or applying for a specific company within our group, for example if you connect with us or if we have any other contact with you in the context of our recruitment work, Fastighets AB Balder, reg.no. 556525-6905, Parkgatan 49, 411 38 Gothenburg, Sweden, is the data controller for the processing of your personal data.

If you are not entirely sure which company within our group is the data controller for your particular application, you can always contact us at dataskydd@balder.se and we will assist you.

Summary of our processing of your personal data

The following is a summary of how we process your personal data. Further down in this document, you will find more detailed information. Click on the links below to jump to the detailed information.

- [Data controller for the processing of your personal data](#).
- Where we get your personal data depends on how you came into contact with us and how you applied for a job with us. Usually we receive the personal data directly from you, but we also process personal data that we have received from your references, from social media, or from a recruitment agency we have used.
- We process several categories of your personal data, such as your name, contact details, and information in your personal letter and CV.
- We have compiled [detailed information in tables](#) below. This will give you a detailed description of our purposes, what personal data we process about you, our legal grounds, and our retention periods.
- [We base our processing on various legal grounds](#), in some cases after a balancing of interests or based on your consent if you have given it.
- [Your personal data is processed by us within the Balder Group](#). In order for us to conduct our recruitment work and process your job application, we may need to share your personal data with other companies in some situations, such as our IT suppliers and the company that provides our recruitment tool.
- [Your personal data may be transferred outside the EU/EEA](#).
- [You have certain rights in relation to our processing of your personal data](#), such as the possibility to complain to the Swedish Authority for Privacy Protection (IMY) and the possibility to obtain an extract from the register showing what personal data we process.

Information about the processing of your personal data

In the information and tables below, you can read more about what personal data we process about you, why we process your personal data, how long we save your personal data, and what lawful basis we have for our processing.

Before any recruitment process

If we are in contact with you before you apply for a job, apprenticeship or similar with us, we will process the personal data you provide us through our communications. In some situations, we process your personal data when someone recommends you, when we connect on social media, if your LinkedIn profile seems interesting to us, or if we become interested in you as a candidate in some other way.

When you connect with us, you have the opportunity to submit references, so called "Recommendations". The people you list as references will be given the opportunity to recommend you for the position you are applying for. It is also possible for us to invite users to recommend you as a candidate. The information provided about you is stored in your profile.

If you choose to connect with us, we process your personal data that you provide us. You can also choose to give us access to your data via Facebook, LinkedIn, or other similar sources.

When communicating with you		
Purpose of the processing	Personal data being processed	Lawful basis
To communicate with you	<ul style="list-style-type: none"> • Name • Contact details • Current place of work and title • Other information you provide us, such as education and skills 	<i>Balancing of interests</i> Our legitimate interest in being able to communicate with you
<p>Retention period: During the time we are in communication with you.</p> <p>In some situations, we will continue to process your personal data for a longer period of time in the manner described below, for example to protect our legal interests or if you have consented to continued processing.</p>		

When someone recommends you or we become interested in your profile in some other way		
Purpose of the processing	Personal data being processed	Lawful basis
To communicate with you To evaluate your profile and match your profile with future positions with us	<ul style="list-style-type: none"> • Name • Contact details • Current workplace, education, and skills 	<i>Balancing of interests</i> Our legitimate interest in communicating with you and evaluating your profile

	<ul style="list-style-type: none"> • If we find you via any social media, we process personal data from your profile, such as your username and the profile picture on your account 	
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Retention period: While we evaluate your profile and during the time we are in communication with you.

You will be given the opportunity to choose whether or not you want us to process your personal data. If you are interested in continuing communication with us, we will process your personal data in accordance with this policy. If you are not interested in continuing communication with us, we will delete your personal data and cease our processing for this purpose.

When you use our Connect service		
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Purpose of the processing	Personal data being processed	Lawful basis
<p>To communicate with you and notify you of vacancies</p> <p>To connect with you and evaluate your profile</p>	<ul style="list-style-type: none"> • Name • Contact details • Which area of work and location interests you • Your photograph and video if you added it • Other information you provide us, such as driving licence data • Information from the platforms you grant us access to, such as Facebook or LinkedIn • Information from your "Recommendations" and others who recommend you for a position with us 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest in being able to communicate and connect with you and to evaluate your profile</p>

Retention period: We save your personal data for six months.

If you choose to deregister from our connect service, we will delete your personal data and cease our processing.

In some situations, we will continue to process your personal data for a longer period of time in the manner described below, for example in the context of a recruitment process, to [protect our legal interests](#) or if you [have consented to continued processing](#).

Registration of unsolicited application, application for a specific position and application for apprenticeship and degree projects

When you apply for a particular position or register an unsolicited application on our website, you provide us with certain personal data. The same applies if you are applying for an apprenticeship with us or want to write your degree project with us. You also have the option to import personal data from other sites you use, such as LinkedIn and Facebook, into your application.

In some cases, we receive your personal data from a recruitment company we have engaged. The personal data we receive about you is that which you yourself have provided to the recruitment company. When the recruitment company processes your personal data, it is independently responsible for the personal data processing. You can obtain information from each respective recruitment company on how they process your personal data. We process your personal data to process your application and to ensure that we hire a person who is qualified for a particular position and to match your profile with a position with us.

When you apply for a job with us, you will have the opportunity to give your consent to answering some questions about yourself. These questions are part of an automated selection process. If you consent to answer these questions, you consent to us processing personal data about you in the form of the answers you provide to the questions. We process your personal data to evaluate certain personal aspects and to analyse your work capacity and reliability. These selection questions are part of the selection process during the recruitment. If you meet the requirements we have set for job applicants, you will proceed in the recruitment process. You have the right to object to this processing of your personal data and you have the right to withdraw your consent.

When you register an application with us, you have the opportunity to provide references, so-called "Recommendations". The people you list as references will be given the opportunity to recommend you for the position you are applying for. It is also possible for us to invite users to recommend you as a candidate. The information provided about you is stored in your profile.

After you have applied for a job with us, we will send you a survey to follow up and evaluate the quality of our recruitment work. Participation in the survey is voluntary.

We will only process your personal identity number if you have provided it yourself and when it is clearly justified considering the purpose of the processing and when it is important for us to be able to make a secure identification.

Selection questions		
Purpose of the processing	Personal data being processed	Lawful basis
To process your application, evaluate your profile, and match your profile with a position with us	<ul style="list-style-type: none">• Name• Contact details• The information provided in the answers to the selection questions,	Your consent

such as driving licence qualifications and language skills

Retention period: We save your personal data throughout the recruitment process

In some situations, we will continue to process your personal data for a longer period of time in the manner described below, for example to [protect our legal interests](#)

When you register an unsolicited application

Purpose of the processing	Personal data being processed	Lawful basis
To process your application, evaluate your profile, and match your profile with future positions with us	<ul style="list-style-type: none"> • Name • Contact details • Information from your CV, cover letter, certificates, and other documents that you add to your application • Your photograph and video if you added it • Your personal identity number if you have provided it • Your login details for our Job Application Management System • Data from social media, such as your LinkedIn profile, if you have chosen to import your data from there • Information from your "Recommendations" and others who recommend you for a position with us • Other information you have chosen to add to your application 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest in administering and evaluating your profile and application</p> <p>We process your personal identity number only when it is clearly justified by the purpose of the processing</p>

Retention period: We save your personal data for six months after you registered your application.

If you withdraw your application, we will delete your personal data and cease processing it for this purpose.

With your consent, we will save your data for two years in accordance with the information under the heading "Future job opportunities" below.

When you apply for a specific position

Purpose of the processing	Personal data being processed	Lawful basis
To process your application and evaluate your profile, and match your profile with a position with us	<ul style="list-style-type: none"> • Name • Contact details • Information from your CV, cover letter, certificates, and other documents that you add to your application • Your photograph and video if you added it • Your personal identity number if you have provided it • Your login details for our Job Application Management System • Data from social media, such as your LinkedIn profile, if you have chosen to import your data from there • Information from your "Recommendations" and others who recommend you for a position with us • Other information you have chosen to add to your application 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest in administering and evaluating your profile and application</p> <p>We process your personal identity number only when it is clearly justified by the purpose of the processing</p>

Retention period: Personal data that we process for the purpose of processing your application for a specific position is generally saved throughout the recruitment process.

If you withdraw your application, we will delete your personal data and cease processing it for this purpose.

With your consent, we will save your data for two years in accordance with the information under the heading "Future job opportunities" below.

When you apply for apprenticeship and degree project

Purpose of the processing	Personal data being processed	Lawful basis
To process your application and evaluate your profile	<ul style="list-style-type: none"> • Name • Contact details • Information about your preferences regarding apprenticeship and degree project • Information from your CV, cover letter, certificates, and other documents that you add to your application 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest in administering and evaluating your profile and application</p> <p>We process your personal identity number only when it is clearly justified by the purpose of the processing</p>

	<ul style="list-style-type: none"> • Your photograph and video if you added it • Your personal identity number if you have provided it • Your login details for our Job Application Management System • Data from social media, such as your LinkedIn profile, if you have chosen to import your data from there • Other information you have chosen to add to your application 	
<p>Retention period: We save your personal data for one year after you registered your application.</p> <p>If you withdraw your application, we will delete your personal data and cease processing it for this purpose.</p> <p>With your consent, we will save your data for two years in accordance with the information under the heading "Future job opportunities" below.</p>		

During the recruitment process

During the recruitment process, we process your personal data to evaluate your application and to match your profile with a position with us. If you complete any problem-solving tests during the recruitment process, we will also process your test results.

If you proceed in the recruitment process, we will process personal data obtained during interviews with you or through documents you provide us with to complete your application. We will also process such personal data that we receive from your references, such as information about you as a person, how you perform your job duties, your qualifications, and whether your references recommend you for the position. In the recruitment process for certain types of positions with us, we will also conduct a background check, such as checking your criminal record.

Recruitment process		
Purpose of the processing	Personal data being processed	Lawful basis
To process and evaluate your application and to match your profile to a position with us	<ul style="list-style-type: none"> • Name • Contact details • Information from your CV, cover letter, certificates, and other documents that you add to your application 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest in administering and evaluating your profile and application</p>

	<ul style="list-style-type: none"> • Your photograph and video if you added it • Your personal identity number if you have provided it • Your login details for our Job Application Management System • Data from social media, such as your LinkedIn profile, if you have chosen to import your data from there • Other information you have chosen to add to your application 	We process your personal identity number only when it is clearly justified by the purpose of the processing
To process and analyse the results of your problem-solving tests	<ul style="list-style-type: none"> • The personal data obtained about you during the tests you take 	<i>Balancing of interests</i> Our legitimate interest in assessing your suitability for a particular position
To evaluate your profile and application, we will, if necessary, carry out a background check in the form of a criminal records check	<ul style="list-style-type: none"> • Date of your criminal record check 	<i>Balancing of interests</i> Our legitimate interest in assessing your suitability for a particular position
<p>Retention period: Personal data that we process for the purpose of processing your application for a specific position is generally saved throughout the recruitment process.</p> <p>If you withdraw your application during the recruitment process, we will delete your personal data and cease processing it for this purpose. The same applies if you are not considered for the specific position.</p> <p>In some situations, we will process your personal data for a longer period of time in the manner described below, for example to protect our legal interests or if you have consented to continued processing. You can read more about this below.</p> <p>Checking your criminal record means that we only look at the excerpt you present to us. After that, only the information that we have checked the extract and the date of the check are processed.</p>		

Survey		
Purpose of the processing	Personal data being processed	Lawful basis
Investigate and evaluate our recruitment activities	<ul style="list-style-type: none"> • Name • Contact details • Your survey responses 	<i>Balancing of interests</i> Our legitimate interest in following up, evaluating, and improving our recruitment activities
<p>Retention period: The data is automatically deleted after one year</p>		

Future job opportunities and other personal data processing after a concluded recruitment process

You can give your consent to our continued processing of your personal data in order to match your profile with future positions with us.

To protect our legal interests in the event of a discrimination dispute, we save your personal data after the recruitment procedure has ended. This is only applicable if you have progressed from the first selection of candidates.

Future job opportunities		
Purpose of the processing	Personal data being processed	Lawful basis
To match your profile with future positions within the Balder Group	<ul style="list-style-type: none"> • Name • Contact details • Information from your CV, cover letter, certificates, and other documents that you add to your application • Your photograph and video if you added it • Your personal identity number if you have provided it • Your login details for our Job Application Management System • Data from social media, such as your LinkedIn profile, if you have chosen to import your data from there • Other information you have chosen to add to your application • The personal data obtained about you during the tests you take • Date of your criminal record check 	<p><i>Your consent</i></p> <p>We process your personal identity number only when it is clearly justified by the purpose of the processing</p>
<p>Retention period: If you consent, we will process your personal data for one year or until you withdraw your consent.</p>		

To protect our legal interests in the event of a discrimination dispute		
Purpose of the processing	Personal data being processed	Lawful basis
To protect our legal interests and present evidence in the event of a dispute	<ul style="list-style-type: none"> • Name • Contact details • Information from your CV, cover 	<p><i>Balancing of interests</i></p>

	<p>letter, certificates, and other documents that you add to your application</p> <ul style="list-style-type: none"> • Your photograph and video if you added it • Your personal identity number if you have provided it • Your login details for our Job Application Management System • Data from social media, such as your LinkedIn profile, if you have chosen to import your data from there • Other information you have chosen to add to your application • The personal data obtained about you during the tests you take • Date of your criminal record check 	<p>Our legitimate interest in defending our legal interests and presenting evidence in the event of a dispute</p> <p>We process your personal identity number only when it is clearly justified by the purpose of the processing</p>
<p>Retention period: We save your personal data for two years and two months after the recruitment process has ended. In the event of a discrimination dispute with you, we will save your personal data until the dispute is finally settled.</p>		

On what legal basis do we process your personal data?

As stated above, in certain situations we process your personal data based on the balancing of interests. The balancing of interests means that we process your personal data when the processing is necessary for purposes related to our legitimate interests. Our legitimate interests will only constitute a lawful basis for the processing of your personal data if your interests and fundamental rights and freedoms do not outweigh our legitimate interests.

If you would like to know more about how we have made this assessment or object to it, you are welcome to contact us at the contact details provided above.

In certain situations, we process your personal data after you have given your consent to the processing. These situations are described above and you can withdraw your consent at any time. If you withdraw all or part of your consent, we will cease processing for that purpose.

Who has access to your personal data?

We share your personal information with companies within our group and with our partners and suppliers in the manner described below.

- When you are interested in a position with a company in our group, we share your personal data with that company to process your application. The company processing

your application is the independent data controller for the processing of your personal data. See Appendix 1 for a list of the companies that are part of our Group.

- We use a recruitment tool that processes your personal data on our behalf and according to our instructions.
- When you use our social media to communicate with us, the site you visit will also process your personal data (e.g. Facebook or LinkedIn).
- To have a functioning IT system and to conduct our business efficiently, we share your personal data with our IT suppliers, who process your personal data on our behalf and according to our instructions.

If you would like more information about how we share your personal data, you are welcome to contact us at the contact details provided above.

Processing of your personal data outside the EU/EEA

The recruitment tools and IT suppliers we use may transfer personal data outside the EU/EEA. This is done if the transfer is supported by the EU General Data Protection Regulation (GDPR). This means that the transfer can be based on, for example, European Commission decisions or standard contractual clauses with additional security measures.

If you would like more information about how your personal data is processed outside the EU/EEA, you are welcome to contact us at the contact details provided at the beginning of this Privacy Policy.

Your rights in relation to our personal data processing

You have certain rights in relation to our processing of your personal data. To exercise your rights, you are welcome to contact us. Our contact details are provided at the beginning of this policy.

Right of access

You have the right to receive confirmation of whether we process your personal data and the right to access information about how the personal data is processed, such as the purposes of the processing and what categories of personal data the processing applies to. You also have the right to a copy of the personal data we process about you.

Right to rectification and right to object to processing

You have the right to have inaccurate personal data corrected without undue delay (for example, if you have changed telephone number) and the right to have incomplete personal data supplemented.

You can object to personal data processing based on a balancing of interests at any time. If we can demonstrate that our legitimate interests in the processing outweigh your interests and fundamental rights and freedoms or if our processing is for the determination, exercise, or defence of legal claims, we may continue our processing despite your objection.

Right to erasure (right to be forgotten)

You have the right to request erasure of your personal data if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw the consent on which the processing is based and there is no other legal ground for the processing;
- you object to the processing and there are no legitimate grounds for continuing our processing;
- the personal data have been unlawfully processed; or
- the personal data must be erased for compliance with a legal obligation to which we are subject.

Right to restriction of processing

You have the right to request that the processing of your personal data be restricted if:

- you dispute the accuracy of the personal data (however, the limitation only applies during the period we verify the accuracy of the personal data);
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- you need the personal data for the establishment, exercise, or defence of legal claims even though we no longer need the personal data for the stated purpose of the processing; or
- if you have objected to the processing and we have not verified whether our legitimate interest in processing your personal data overrides your legitimate interest in restricting the processing of your personal data.

Right to withdraw consent

If you have given your consent to a particular processing of your personal data, you can withdraw all or part of your consent at any time.

Right to data portability

You have the right, under certain conditions, to receive the personal data concerning you that you have provided to us in a structured, commonly used, and machine-readable format and the right to transmit these to another data controller (data portability).

Right to complain

You have the right to complain about our processing of your personal data to a competent supervisory authority. The competent supervisory authority in Sweden is the Swedish Authority for Privacy Protection (IMY).

The Privacy Policy was adopted by Balder on 29 October 2021.