

Applicant Privacy Notice

Artificial Solutions

May 2018



Processing Your Personal Data - The Headlines

What categories of personal data does Artificial Solutions collect about me and why?

"Personal data" means any information relating to *you*. During the application process, Artificial Solutions will collect, process and use your personal data, for a range of different purposes. For example:

<i>What personal data?</i>	<i>Why?</i>
<ul style="list-style-type: none">• Identification - your name, nationality, national insurance number, bank details• Contact details• Dependent details• Education and work experience• Organisational data Information collected as part of your interview process• Background check information• Other application data (e.g. information contained in your CV and obtained from recruiters)• Social Media profile information provided	<ul style="list-style-type: none">• To process your application• To determine your eligibility for the role you have applied for• To conduct background checks as part of your application• To communicate with you about future job opportunities• To comply with the law and our obligations• To communicate with you and with Artificial Solutions employees and third parties• To comply with our financial and regulatory obligations

It's important to know that Artificial Solutions may also need to process sensitive personal data about you such as health and medical data.

Find out more about what data Artificial Solutions processes and why by reading the detailed [Applicant Privacy Notice](#).

Who might Artificial Solutions share my personal data with, and what happens if it's transferred out of the country where it originated?

As you know, we are part of Artificial Solutions international group of companies - and entities in this group are involved in processing data.

We might also need to transfer your data to other third parties - e.g. potential business partners, acquiring entities, suppliers, customers, or government bodies. Our policy is to limit who has access to that data as much as we can. If we need to transfer data out of the country where it originated, Artificial Solutions will take all necessary measures to ensure your data is adequately protected. **Find out more** about who your data is shared with, and what steps we take to protect it.

How long will Artificial Solutions keep my personal data for?

We won't keep it for any longer than we need to, either to comply with the law or to ensure that we are complying with our obligations to you and other third parties. **Find out more below.**

What rights do I have in respect of my personal data?

You have a number of rights in relation to your data. These include a right to access, correct and erase your data as well as more technical rights to restrict the way we process it, and to transfer your data.

Your rights are important, and we've set them out in detail below.

Who can I contact if I have questions?

If you have concerns or questions regarding your personal data, please contact us at LegalCompliance@artificial-solutions.com.

Artificial Solutions Applicant Privacy Notice

Artificial Solutions ("**Artificial Solutions**") has prepared this Applicant Privacy Notice ("**Notice**") for applicants to roles with Artificial Solutions. In connection with your application we have to process your personal data. We know that the fact that we'll need to use your personal data may be quite obvious to you. However, the purpose of this Notice is to give you information about how Artificial Solutions collects, processes, stores and otherwise uses information about you, and your rights in relation to that information.

Artificial Solutions needs to process your personal data in order to process your application for employment. There are also statutory requirements we have to comply with in relation to your application. If we are not able to carry out the processing activities we describe in this Notice we may not be able to continue with your application. Of course, we hope it would never come to that, and this is simply information we are obliged to provide to you as part of this Notice.

We need to ask for your specific consent to process your personal data in a particular way in certain circumstances, such as for the purpose of conducting background checks prior to you commencing employment with us, to enable relevant third parties to release information about you as part of those checks. Please sign and complete the consent form at the end of this Notice to confirm you consent to us processing your data for the purposes of carrying out the background checks listed.

Although we are seeking your consent in relation to certain background checks, you should note that in most cases we will process your personal data for the reasons set out in this Notice and it won't be appropriate or necessary for you to provide consent as the legal basis for processing your personal data.

When we say "Artificial Solutions", "we" or "us" in this document, we mean the Artificial Solutions entity that you're applying to work for. In addition, you will see a number of references to the "Artificial Solutions Group", which includes all other Artificial Solutions entities globally. Details of these can be obtained [here](#). We may update this document from time to time, for example if we implement new systems or processes that involve the use of personal data.

In this Notice you will see reference to "GDPR" - that refers to the General Data Protection Regulation which is a European law governing your rights in relation to your personal data, and how organisations should protect it.

What categories of personal data does Artificial Solutions collect about me and why does Artificial Solutions use it?

"Personal data" means any information relating to you. Artificial Solutions will collect, process and use the following categories and types of personal data about you:

- **identification data**, such as your name, citizenship, passport data, national insurance number, health insurance and governmental retirement plan information and tax reference;
- **personal information**, such as your date and place of birth, emergency contact details, and gender;
- **contact details**, such as your home address, telephone number and email address;
- **education and work experience**, such as contact details for your current/former employer, information about your educational background, your work experience and other experience;
- **other application data**, such as the information included in your application form/CV;
- **information collected as part of the interview process**, such as notes taken from your interview or information provided from recruitment agencies;
- **background check information**, such as information obtained through reference checks and confirmation about your work/educational background.

together "**Applicant Data**".

We collect and use this Applicant Data for a variety of reasons linked to processing your application for a role with us. To help clarify these we have set out below a list of reasons why we collect and use this data (the "**Processing Purposes**") along with examples of some of the Applicant Data used for each of the Processing Purposes:

- **administering and processing your application**, (including processing a job offer should you be successful) including identification data, contact details, information about your qualifications and employment history, and information obtained during your interview and information contained in your CV;
- **to determine your eligibility for the role you applied for**, including identification data, contact details, information about your work and education experience, information obtained during your interview and information contained in your CV;
- **conducting background checks as part of your application**, including identification data, contact details, information about your qualification and employment history;
- **complying with applicable laws and employment-related requirements** along with the administration of those requirements, such as income tax, national insurance deductions, and employment and immigration laws which involves the processing of identification data and contact details;
- **monitoring and ensuring compliance with applicable policies and procedures and laws**, which involves the processing of your identification data and contact details, including the operation of a whistleblowing hotline;
- **communicating with you, other Artificial Solutions employees and third parties, including informing you of future opportunities with Artificial Solutions** (such as existing or potential business partners, suppliers, customers, end-customers or government officials), including communicating future employment opportunities, which involves the processing of identification data and your contact details;
- **responding to and complying with requests and legal demands from regulators or other authorities** in or outside of your home country which involves the processing of identification data and contact details;
- **complying with corporate financial responsibilities**, including audit requirements (both internal and external) and cost/budgeting analysis and control which involves the processing of identification data, contact details, information about the role you have applied for, including the role's salary and benefits.

In addition to the collection, processing and use of the Applicant Data, Artificial Solutions collects, processes and uses the following special categories of personal information about you which we describe as "**Sensitive Applicant Data**":

- **health and medical data**, such as information on disability for purposes of accommodating your application and interview and compliance with legal obligations.

Why does Artificial Solutions need to collect, process and use my Applicant Data and Sensitive Applicant Data?

Both the Applicant Data and Sensitive Applicant Data are needed by Artificial Solutions to carry out a variety of activities that are linked to your application for a role with us and Artificial Solutions' compliance with its obligations as part of the recruitment process and as a business.

We are required to explain to you the legal bases for our collecting, processing and use of your Applicant Data and Sensitive Applicant Data. We have a number of these, so please bear with us, and to make sure you have the full picture we have listed them all below:

For Applicant Data, our legal bases are:

- compliance with legal obligations, in particular in the area of labour and employment law, social security and protection law, data protection law, tax law, and corporate compliance laws; the legitimate interests of Artificial Solutions, Artificial Solutions affiliates or other third parties (such as existing or potential business partners, suppliers, customers, end-customers or governmental bodies or courts); your consent,

where that is appropriate, meets the requirements of data protection law and has been separately obtained; protection of vital interests of you or of another individual; performance of a task carried out in the public interest or in the exercise of official authority vested in Artificial Solutions.

For Sensitive Applicant Data, our legal bases are:

- explicit consent as allowed by local data protection law; to carry out the obligations and to exercise the specific rights of Artificial Solutions or you in the field of employment and social security and social protection law as permitted by local data protection law and/or a collective agreement; to protect the vital interests of you or of another individual where you are physically or legally incapable of giving consent; public data as made public manifestly by you; to establish, exercise or defend a legal claims or whenever courts are acting in their judicial capacity; for substantial public interest as permitted by local data protection law; for assessment of the working capacity of the employee as permitted by local data protection law.

We appreciate that there is a lot of information there, and we want to be as clear with you as possible over what this means. Where we talk about legitimate interests of Artificial Solutions or third parties, this can include:

- Assessing your suitability for employment/engagement with Artificial Solutions;
- Implementation and operation of a group-wide organisational structure and group-wide information sharing;
- Right to freedom of expression or information, including in the media and the arts;
- Prevention of fraud, misuse of company IT systems, or money laundering;
- Operation of a whistleblowing scheme;
- Physical security, IT and network security;
- Internal Investigations;
- Proposed mergers and acquisitions.

When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

Got it - but who might Artificial Solutions share my personal information with?

As you know, we are part a global Artificial Solutions group, and several entities across this network are involved in the Processing Purposes. To ensure that the Processing Purposes can be completed, your information may be shared with any of the entities within the Artificial Solutions Group network. Where we do share data in this way, however, it is our policy to limit the categories of individual who have access to that personal information.

Artificial Solutions UK may transfer personal data to third parties, including to entities within and outside our network located in any jurisdictions where Artificial Solutions Group entities are located, for the Processing Purposes as follows:

- **Within the Artificial Solutions Group.** As your Artificial Solutions employing entity is part of a wider group headquartered in Sweden with offices located across the globe, which share management, human resources and legal, compliance and audit responsibility, Artificial Solutions may transfer your Personal Data to, or otherwise allow access to such data by other entities within the Artificial Solutions Group, which may use, transfer, and process the data for the following purposes: to maintain and improve effective administration of the workforce; to communicate information about the Artificial Solutions Group; to

maintain a corporate directory; to monitor and assure compliance with applicable policies and procedures, and applicable laws; and to respond to requests and legal demands from regulators and other authorities.

- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent external advisors (e.g., auditors), insurance providers, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Data processors.** As necessary for the Processing Purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions ("**Data Processors**"). The Data Processors may carry out instructions related to recruitment, workforce administration, IT system support and maintenance, payroll, compensation, benefits, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information, and to process the personal information only as instructed.

For a full list of the Artificial Solutions Group entities and third parties that we may share your data with, please contact us.

As you may expect, some of the recipients we may share Employee Data and Sensitive Employee Data with may be located in countries outside of Europe. In some cases, this may include countries located outside the European Union and/or European Economic Area ("EEA"), and in particular this will include countries throughout the Americas where the Artificial Solutions Group operates.

Some countries where recipients may be located already provide an adequate level of protection for this data (e.g. Canada), and transfers to other countries such as the USA may be protected under arrangements such as the EU-US Privacy Shield. Nonetheless, for transfers to Artificial Solutions Group entities outside of the EEA, Artificial Solutions UK will be bound by the EU Standard Contractual Clauses pursuant to Article 46(2)(c) GDPR, which the European Commission has assessed as providing an adequate level of protection for personal data, to ensure that your data is protected adequately.

If recipients are located in other countries without adequate protections for personal data, Artificial Solutions UK will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. This will include using appropriate safeguards such as the EU Standard Data Protection Clauses. You can ask for a copy of the such appropriate safeguards by contacting us as set out below ("**Who can I contact about this stuff?**").

How long will Artificial Solutions keep my personal information for?

It is our policy not to keep personal information for longer than is necessary. We may, for example, keep your personal information for a reasonable time after your application process is completed, in case we have future job opportunities that we consider you are suitable for. Where personal information is kept, that period will be determined based on the applicable local law. Please contact us as set out below to request further details on how long Artificial Solutions will retain different categories of personal information.

What rights do I have in respect of my personal information?

You have a number of rights in relation to your Applicant Data and Sensitive Applicant Data. These can differ by country, but can be summarised in broad terms as follows:

(i) Right of access

You have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed, the purpose of the processing and the recipients or categories of recipients. We do have to take into account the interests of others though, so this is not an absolute right, and if you want to request more than one copy we may charge a fee.

(ii) Right to rectification

You may have the right to rectify inaccurate or incomplete personal data concerning you.

(iii) Right to erasure (right to be forgotten)

You may have the right to ask us to erase personal data concerning you.

(iv) Right to restriction of processing

In limited circumstances, you may have the right to request that we restrict processing of your personal data, however where we process Applicant Data and Sensitive Applicant Data for the Processing Purposes we think that we have a legitimate interest in processing that day which may override a request that you make.

(v) Right to data portability

You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

(vi) Right to object and rights relating to automated decision-making

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by us and we can be required to no longer process your personal data. this may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.

To exercise any of these rights, please contact us as stated under below (**Who can I contact about this stuff?**).

You also have the right to lodge a complaint with the competent data protection supervisory authority.

Who can I contact about this stuff?

If you have concerns or questions regarding this Notice or if you would like to exercise your rights as a data subject, you can get hold of the right person at LegalCompliance@artificial-solutions.com.