



Privacy Notice

For Inspera Applicants

Inspera AS and its subsidiaries (collectively referred to as “Inspera”, “We”, “Us”) are committed to protecting Your fundamental rights and freedoms and respecting Your right to privacy. This privacy notice (“Privacy Notice”) explains how Inspera processes personal data as Controller in accordance with applicable data protection and privacy laws.

Please read this information carefully.

This Privacy Notice applies to anyone whose personal data We collect and process as Controller in the course of the steps prior to the employment relationship between any Inspera legal entity and the applicants, from the moment they apply to any Inspera vacancy until the recruitment process ends.

Inspera Respects Your Privacy

Protecting personal data and ensuring security of all information are core principles for Inspera. All data that You provide to Us during the course of the application and possible subsequent hiring process will be treated with confidentiality and in strict adherence to all data protection legislation to which We shall ensure compliance to.

1. Inspera as Controller

This Privacy Notice applies to Inspera's processing of personal data as Controller (processing activities in which We decide the purposes and means of the processing of Your personal data). The Controller shall be the Inspera legal entity to which You are applying, and this Privacy Notice applies to all Group companies. As part of Your application process, Inspera will process the personal information that You provide, all in connection with Your individual application.

Inspera shall process Your data in compliance with the relevant data protection laws, which include, but are not limited to, the General Data Protection Regulation (GDPR).

The purposes for which We act as Controller and process Your personal data are the following:



- Carry out the application process, which includes but may be not limited to verifying candidate background, contacting applicants, and conducting interviews in order to determine the candidate's qualifications;
- To potentially prepare the employment relationship between the applicant and the legal entity of the Inspira group.

Please note that for a substantial part of Our business, We act as Processor (where Our business customers, such as universities and other educational institutions, decide the purposes and means of the data processing).

This Privacy Notice is only applicable to natural persons that intend to enter into a future employment or consultancy relationship with Inspira and its subsidiaries.

2. What Personal Data We Collect & How We Collect It

Personal data is any information regarding an identified or identifiable individual. We may collect, use, store and transfer different kinds of personal data regarding You, which We have grouped together as follows:

- **Personal details:** full name, date of birth, gender, nationality and contact information.
- **Background and Education details:** employee's educational qualifications, including degrees, certifications, and vocational training.
- **Background Checks:** References and cover letter.
- **Documents:** such as other certificates, health related documents.

Additionally, and only if strictly necessary, We may also collect other categories of personal data, including **special categories of personal data**, such as health data or union membership data. Whenever any special category of personal data shall be processed, the processing shall rely on art.9.2. b) of the GDPR.

As a core principle, Your personal data that is processed is collected directly from You, when applying to Our email recruitment@inspera.com.

However, You have the possibility to be referred to a position by an Inspira Group employee, as We have Our own Referral Programme in place. For this purpose, You shall provide Your application documentation to this associate to share with Our Human Resources department, along with Your consent to be contacted by Inspira following this referral.



3. How We Further Process Personal Data

We will only process Your information for the above mentioned specific reasons and only where We have a lawful basis to do so. Most of the personal information We process is provided to Us directly by You during the application and hiring process.

Under the General Data Protection Regulation (GDPR), we will rely on the following lawful basis to process your data:

- The main legal basis for the purpose of processing laid down previously will be **to take steps at the request of the data subject prior to entering into a working contract** [art. 6.1. b) GDPR];
- Your **consent**, which You will be able to withdraw at any moment, via the contact details provided in the end of this Privacy Notice [art. 6.1. a) GDPR];
- **Legitimate Interest** of Inspera in processing your data [art. 6.1. f) GDPR]. We shall fairly balance Inspera's legitimate interests in conducting business against Your own interest in protecting Your personal data, in accordance with statutory provisions.

On a case-by-case basis, We may also use Your personal data for certain purposes that are not incompatible with the purpose for which the data was originally collected or received, such as audits, analytics, reporting, innovation, dispute resolution and mergers and acquisitions.

We will not sell or rent Your personal data to anyone.

4. How Long We Keep Your Personal Data

We keep Your personal data for as long as necessary for the purposes listed above, or when Inspera no longer has any legitimate interest in this data retention.

Your personal information shall be stored longer if We are legally required to do so under the relevant and applicable national law. It is important to emphasise that special situations may lead to longer or shorter retention periods than the ones described above. We will in any case retain data as long as required subject to legal requirements (e.g., due to social security or tax law requirements), and in case special needs arise (e.g., due to complaints or claims made against Us or by Us).

Regardless, after the selection process comes to an end and in case of an unsuccessful outcome (i.e., Your application has been rejected or You



retract from the recruiting process) or if You revoke your consent, We will delete your personal data as soon as the legally required time has elapsed.

In case you provide your consent for the purpose of being in contact for future professional opportunities, after an unsuccessful outcome of the recruiting process, Inspera may keep your CV for **up to 6 months** after the rejection of your application.

5. How We Share Your Personal Data

We may disclose Your personal data to the following categories of recipients, to the extent necessary for the purposes mentioned above:

- Within Inspera's legal entity: only the staff involved in Your application process (e.g., HR department and Hiring Manager) shall have access to applicants' personal data for the above mentioned purposes;
- Other legal entities of Inspera's group: Inspera's other legal entities are data controllers themselves, for their own vacancies. The persons involved in the recruiting purpose may belong to different Inspera legal entities, hence the intra-group transfer of personal data. Additionally, data may also be transferred between Inspera legal entities due to internal administrative purposes;
- Data processors: in addition, Inspera may use service providers to fulfil its contractual and legal obligations. In this constellation, Inspera confirms to have completed contracts with them, and appropriate safeguards are in place to ensure that the transfer of data is secure and lawful.
- To authorities or third parties if required by law or a binding court order.
- To our advisors, owners, and other business partners, to the extent that they need to access Your data to operate Our business in an industry standard manner, which may also include third parties in connection with possible mergers or acquisitions of Inspera's business.

Personal data is not transferred to third parties without proper data processing agreements and appropriate safeguards in place, to the extent required under applicable data protection law.

6. Transfer of Personal Data Outside Your Jurisdiction

Our Services are global, and Your personal data may be processed in any country where We have operations or where We engage with service providers. Our Services are located in Norway, Denmark, Sweden, Portugal,



the United Kingdom, Australia, the United States of America, India, and Kosovo. Consequently, Your personal data may be transferred to a destination outside the country where You are located, which may have data protection rules that are different from those of your country. By submitting Your personal data, You acknowledge such transfer, storing or processing of personal data outside Your jurisdiction.

We will take all steps reasonably necessary to ensure that Your data is processed securely and in accordance with this Privacy Notice and applicable laws. This means that Your personal data will only be transferred to a country that provides an adequate level of protection or where we have a valid transfer mechanism in place with the recipient in accordance with applicable law.

Should We transfer data outside the EEA to recipients such as law enforcement authorities, courts or parties to a lawsuit, if deemed necessary for the exercise of or defence of legal claims, this transfer shall be done in accordance with the art. 49.1 e) of the GDPR.

We will provide You with further details about such international data transfers upon request. If You want to obtain a copy of the safeguards, please use the contact details below.

7. Security

Inspera employees and any company that may provide services on our behalf are bound to confidentiality and to compliance with the relevant and applicable data protection legislation. We at Inspera shall implement all the necessary and appropriate technical and security measures to ensure the security and protection of the personal data that We may receive from applicants. As a core duty to how Inspera does business, we assume the compromise to protect and keep your data secure from the risks of unauthorised and unlawful access, disclosure, loss, manipulation, or modification of your data.

We employ administrative, technical, and physical security measures to help ensure the confidentiality, integrity and availability of your personal information.

In an effort to minimise interference or unauthorised access from third parties, we store and process Personal Information in cloud-based systems that employ firewalls, encryption, and other industry-standard technology.

8. Your Privacy Rights



You have several rights as regards the processing of your personal data, under the relevant data protection laws. While exercising them, please make sure to provide enough identifiers so we can unambiguously identify You. Such rights include:

- **Request access to your personal data:** as data subject, you have the right to confirm whether Inspira is processing your personal data and, if yes, you have the right to have access to the personal data We keep about You.
* Kindly have in mind that this right might be restricted due to protection of other persons' privacy, as well as consideration for Our know-how and business secrets.
- **Request the correction of your data:** if deemed incorrect or incomplete, you have the right to request the rectification of your information;
- **Request erasure:** in certain cases, You have the right to request the deletion of Your data. These cases are the following:
 - Processing Your personal data is no longer necessary for fulfilling the initial purpose for which it was collected and further processed, and no new lawful purpose exists;
 - You have withdrawn Your consent and We don't have another lawful ground to process Your personal data;
 - The personal data has been processed unlawfully.
- **Request restriction to processing:** you have the right to limit Our processing activities in cases in which:
 - You have disputed the accuracy of Your own data and We've taken time to investigate and confirm the accuracy;
 - Data has been processed unlawfully, but You prefer the suspension of the processing activity over the deletion of personal data;
 - We no longer need Your personal data for the purposes of processing, but You want to keep it due to any legal claim;
- **Data Portability:** You have the right to ask for Your personal data to be sent to You or to another Controller in a structured and common machine-readable format.
- **Right to withdraw Your consent:** in case any of the abovementioned processing activities is based on Your consent, you shall be able to withdraw it at given time, by contacting the email address provided in section 11. of this Privacy Notice.
- **Right not to be subjected to automated individual decision-making:** you have the right not to be subject to a decision based solely on automated processing, which includes profiling, and can have legal or similar significant effects on You. We at Inspira do not make any use of decision-making algorithms for recruiting and hiring processes.



To the extent that local data protection and privacy laws apply to the processing of Your personal data, we will respect any additional rights you may have pursuant to such laws.

Please note that these rights are subject to conditions and limitations by law. Please contact Us as set out at the end of this Privacy Notice if you want to exercise any of your rights or if you would like more information about the conditions/limitations that apply. We will respond to your inquiry as soon as possible and typically within one month at the latest.

9. Complaints

If You have any complaints about our use of Your personal data, please contact Us as set out at the end of this Privacy Notice.

You may also file a complaint to Your local data protection authority in case You have any reservations with how We are processing Your data. You can file a complaint to the supervisory authority that is responsible for Your current territory of residence, or to the supervisory authority responsible for the correspondent Inspera legal entity.

10. Data Subjects Under the Age of 18

We do not knowingly collect or process personal data relating to children as Controller, for the purposes of processing mentioned above. The recruiting and hiring process is not meant for individuals under 18 years of age.

11. Changes to this Privacy Notice

We may change this Privacy Notice at any time, when deemed necessary. Any changes We make will be made available on this page.

We reserve the right to make changes to Our practices and this Data Privacy Notice at any time, so please check back frequently to see any updates or changes to our Privacy Notice.

12. Contact Us

Please feel free to contact Us if You have any complaints, questions, or comments about Our privacy practices, or if You would like to exercise Your privacy rights.

Please contact Us to the following email address: privacy@inspera.no.



The same details can be used to contact Our Data Protection Officer (DPO).