



Candidate Integrity Policy Looklet Sweden

Last update: 2018-05-17

This privacy policy explains how we collect and use your personal information when you send in your application for a position here at Looklet. It also describes your rights and how you can apply them. It's important that you read and understand this privacy policy and that you feel safe in our processing of your personal information. If you have given us irrelevant information that you want us to delete, please get in contact with us and we'll see to that.

By applying to a position here at Looklet, you consent with this policy.

We are looking forward on your application!

This policy provides you information about collection, processing, and sharing of personal information of candidates and applicants. All basic data that we have about our candidates and applicants are provided by you.

What is personal data and what is a processing of personal data?

Personal data are all kinds of information that can be used, directly or indirectly, to identify a physical person that is alive. For example, images and sound recordings that are processed in a computer can be personal data even if no names are mentioned. Encrypted data and different types of electronic identities (such as IP addresses) are considered personal data if they can be linked to a physical person.

Processing of personal data is then how the personal data is used. Any action taken with personal data is a treatment, regardless of whether it is performed, automated or not. Examples of common treatments are collection, registration, organization, structuring, storage, processing, transfer and deletion.

Who is responsible for the data that Looklet collects and who do I contact if I want know more?

Looklet AB, org. nr 556773-6854, with address Åsögatan 119, 116 24 Stockholm, is responsible for the processing of personal data.

If you have questions about this policy, about data treatment at Looklet in general or want to make a data access request, please email our Data Protection Officer at dpo@looklet.com.

What data do we process and why?

Bellow you will find more information about each treatment, purpose, process and categories of data.



From where do we get your data?

We get the data from you when you are applying to Looklet. After that we collect data from you when we need it in order to move on in the selection process.

Who are we sharing your data with?

Sometimes it is necessary to share your data with third parties in order for us to fulfil our obligations or have our business work smoothly. When we share your data with a third party, they become so called "Personal Data Processors" (SE: Personuppgiftsbiträden) for us. A Personal Data Processor is a company that processes the information on our behalf and according to our instructions. We have Personuppgiftsbiträden who help us with:

- 1) Administer the recruitment process (Workable)
- 2) External help with the full recruitment process (Headhunting and recruitment companies)

When your personal information is shared with the Personal Data Processor, it is compatible with the purposes of which we have collected the information. We make sure that the Personal Data Processor can provide and guarantee security and confidentiality of personal data by having written contracts with them where they guarantee security of the personal information processed, and to comply with our security requirements and limitations regarding international transfer of personal information.

Companies that are Personal Data Responsible even though they get the data from us

Sometimes we need to share your information with companies that independently are responsible for the data they treat about you even though it was provided by us and we don't have any agreement with them.

That means that the company is personally responsible for how the data is treated and that we do not control how it is used.

Independent Personal Data Responsible companies that we share personal information with are:

- 1) Government authorities (police, tax authorities, Kronofogden, Official statistic records or other authorities) if we are required by law or in suspicion of crime.
- 2) Companies that help us with auditing and migration board processes, such as KPMG and PWC

When your personal data is shared with a company that is personally responsible for personal data, it is that company's privacy policy that is applied.

Where do we process your personal information?

We constantly strive for your personal information to be processed within the EU/EES, our own IT systems are also within EU/EES. However, in case of systematic maintenance and support we may have to transfer the data to a non-EU/EES country. If we share your information with a personal data processor (or through a subcontractor) who is established or stores information in a non-EU/EES country, they are only to share personal information legit to the purpose. With the exception for Name, Username and contact details in case it's about setting up an account in order to do work.

How long do we save your personal information?

We never save your personal information longer than what is necessary for each purpose. See more about the specific storage period for each purpose.

As registered, what rights do you have?



Right to access. If you would like to have a deeper insight about what personal information we process about you, you may request access to the information (the information is provided in a registry drawing indicating purpose categories of personal data, categories of recipients, storage periods, information about and where the data has been collected). Please note that if we receive a request for access, we might ask for additional information to ensure efficiency of how the request is handled and that the information is provided to the correct person.

Right to rectification. You may request for your personal information to be corrected if the data is incorrect. Within the stated purpose, you also have the right to complement any incomplete data.

Right to deletion. You may ask to delete your personal information that we process if:

- The information is no longer necessary for the purposes for which they have been collected or processed.
- You oppose an interest deliberation we have based on legitimate interest and your objection is superior to our legitimate interest.
- Personal data is processed illegally.
- Personal data must be erased to comply with a legal obligation we must include.

Keep in mind that we may have the right to deny your request if there is any legal obligations that prevent us from immediately deleting certain personal information. These obligations derive from accounting and tax legislation, banking and labour legislation etc.. It may also be possible that our process is necessary for us to determine, enforce or defend legal claims. If we are prevented to meet a request of erasure, we will instead block the personal data from being used for purposes other than the purpose that prevents the requested deletion.

Right to restriction. You are entitled to request a limited processing of your personal data. If you oppose that the personal data we process is correct, you may request limited treatment during the time we make sure that the information processed is correct. If we no longer need the personal information for the stated purposes, but you need them to determine, enforce or defend legal claims, you may request limited processing of our data. This means that you can request that we do not delete your personal information.

If you oppose to an interest bearing of legitimate interest that we have made as a legal basis for a purpose, you may request limited treatment for the time we need to evaluate whether our legitimate interests outweigh your interest of getting your personal data deleted.

If the usage has been limited in accordance with any of the situations above, we may in addition to the actual storage, process the data to determine, enforce or defend legal claims, to protect someone else's rights or if you have given your consent.

Right to object to certain treatments. You are always entitled to object to all processing of personal data based on a balance of interest.

Legitimate interest: In cases where we use a legitimate interest as a legal basis for a purpose, you are entitled to object to the usage. In order to continue processing your personal information after such objection, we need to display a compelling legitimate reason for the current usage that outweighs your interest, rights or freedom. Otherwise we may only process the personal data to determine, exercise or defend legal claims.

Right to data transfer. If our right to process your personal information is based either on your consent or of an agreement with you, you are entitled to request the data relating to you which you have provided to us, to another person responsible for personal information.

How do we protect your personal information?

We use IT-systems to protect the privacy, integrity, and access to personal data. We have made certain security measures to protect personal data against unauthorized or illegal treatment such as unauthorized access, loss, destruction or damage. Only those who actually need to process your personal information to fulfil our stated purposes have access to them.



What if we make changes to this policy?

We may make changes to our policy. For updates that are critical to our processing of personal data (such as change of specified purposes or categories of personal information) or updates that are not critical to the treatment but which may be of crucial importance to you, you will receive information by email in good time before the update starts to apply. When we provide information about updates, we will also explain the meaning of the update and how it will affect you.

Treatments that are made with your personal data

1. Recruitment Process - applicants

Processing that is done:

- First Selection of candidates:

As soon as you send in your application, or approve that you want to participate in our process after being contacted, you become a part of our recruitment process. When we have a number of applicants we start our screening after the candidates that are the best match in terms of competence/experience required for that position.

- Interview Process:

Should you be selected to move on in the recruitment process, you will be contacted for either a personal meeting or a phone meeting. In this meeting, the interviewer may come to take notes.

Should you move on from that interview, you may come to meet more people from Looklet that will also take notes during the interviews.

As a part of the recruitment process Looklet often makes competence tests in second or third stage (may come to vary). These tests are used to understand how well the candidate is mastering the skills required and can also come to be compared to other candidates results in order to find the best match.

The interviewers can vary, but a typical process is to meet the manager, team members and someone from the Human Resources department.

- References

As a final step in the recruitment process we take references from people that you have worked with in the past.

What kind of personal data do we use in order to do all of that?

- Name
- Contact Details (Phone number/E-mail)
- CV/Resume
- Personal letter
- Language skills
- Interview notes
- Test results

Sometimes the candidates/applicants chooses to voluntarily provide Looklet with additional information in which cases these are also stored.

**Legal ground:**

Legitimate interest: In order for us to make sure we have a good recruitment process and make the right choice in our process, we need to understand the experience of the candidate and in order to be able to compare, we also need to take notes during the process.

As it's important to Looklet work against discrimination and for equal rights and possibilities regardless of gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age, we also take notes about working experience and personal fit to make sure that is the only factors that are of value for the process.

Storage duration: 2 years after a recruitment process has ended to be able to prove that no discrimination is taking place in our recruitment processes. This is with reference to fulfilment of the Discrimination act.

2. Saved in our database

Processing that is done:

- Future recruitments

Your application will only be processed for the position that you have applied for. Should you want to make your resume available for other open positions at Looklet, please click the consent checkbox when you submit your application.

Should you file a spontaneous application to Looklet, not attached to any open position, your application will be stored automatically for 2 years and be made available to the recruiting manager of the positions that might be a fit.

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