# **Landsvirkjun Privacy Policy**

Job applicants

Landsvirkjun is committed to ensuring the accuracy, confidentiality and security of the personal data of job applicants processed by the company.

This Privacy Policy is intended to inform applicants of what personal data the company collects and how the company uses such personal data.

This Privacy Policy applies to personal data regarding all job applicants at Landsvirkjun, including summer jobs. The Policy also refers to applicants as "you" and to the company as "us".

## 1. Purpose and legal obligation

Landsvirkjun is committed to comply with applicable data protection legislation and this Privacy Policy is based on the Icelandic Act No. 90/2018 on Data Protection and the Processing of Personal Data ("**the Privacy Act**").

### 2. What is personal data?

Personal data, as defined by this Privacy Policy, means any information relating to an identified or identifiable natural person, i.e. information that can be traced directly or indirectly to a specific individual. Anonymous data and information that does not relate to an identified or identifiable natural person is not considered personal data.

#### 3. Personal data collected and processed by Landsvirkjun

We collect and store various personal data about applicants, and processing and collection partially depends on the nature of the job applied for.

Following are examples of data Landsvirkjun collects about applicants:

- contact information, such as name, social security number, address, telephone number and e-mail address;
- job applications;
- CV and information regarding education, training and job experience;
- information from referees and recruitment offices where applicable; and
- information from job interviews.

In addition to the above-mentioned data, Landsvirkjun may also collect and process other information that you provide to Landsvirkjun during the application process. For certain jobs, we may ask applicants to undergo a personality test.

In general, the company collects personal data directly from you, but we may request information from the referees you specify in your application. In other cases, where personal information is collected from a third party, the company will endeavor to inform you of such collection.

In the event that you are offered a job with the company, the company may request a copy of or information from your criminal record in connection with certain jobs, prior to entering into an employment contract.

#### 4. Why do we collect personal data and on what basis?

We collect personal data about applicants first and foremost to assess their qualifications for the job in question.

The personal data we collect about you is processed in connection with your application for a job with the company, i.e. based on your request to enter into a contract with the company.

In cases where a criminal record is requested, it is based on legitimate interests of the company, since the job is of the nature that the interests of the company to obtain information from the criminal record obviously outweigh the interests of the applicant in keeping the information secret.

It should be noted that if you do not provide Landsvirkjun with the requested information in the recruitment process, it may result in the company not being able to hire you.

### 5. Access to personal data and transfer to third parties

Access to data regarding applicants is exclusively for Landsvirkjun's human resources division and the directors and supervisors of the job applied for. If a recruitment office is used during the recruitment process, the recruitment office also has access to data regarding applicants as a third party.

Landsvirkjun may also provide limited personal data about applicants to referees. Furthermore, your personal information may be shared with third parties that provide the company with IT services.

Landsvirkjun will not transfer your personal data outside the European Economic Area unless permitted by applicable privacy legislation.

Your personal data may be transferred to a third party to the extent permitted or required based on applicable laws or rules, such as to the National Archives. Also, your personal data may be transferred to a third party to respond to legal measures such as house searches, subpoenas or a court order. Transfer may also be necessary in the event of an emergency or to ensure the safety of Landsvirkjun's employees or third parties.

#### 6. How is the security of personal data ensured?

Landsvirkjun is a certified company according to the ISO 27001 standard on Information Security Management Systems. The scope of certification covers all employees and all activities at the company's headquarters.

Landsvirkjun seeks to take appropriate technical and organizational measures to protect your personal data. These measures are intended to protect personal data from being accidentally lost or altered and against unauthorized access, copying, use or dissemination.

Applications and other data related to the recruitment process are stored in an electronic form and hosted in Landsvirkjun's access-controlled computer system. Paper copies of applications and supporting documents of applicants called in for interviews will be destroyed after the recruitment process is over.

#### 7. Retention period

As Landsvirkjun is subject to a retention obligation based on the Public Archives Act No. 77/2014, the company is prohibited from disposing of or destroying any document which falls under the scope of the Act, unless specifically authorized by the national archivist.

## 8. Changes and corrections to your personal data

It is important that the personal data processed by Landsvirkjun are both accurate and pertinent. During the application process it is therefore important that you notify the company of any changes that may occur to the personal data you have provided to us.

Please direct all updates to Sturla J. Hreinsson, the company's Human Resources Manager.

### 9. Your rights regarding the personal data processed by the company

You have the right to obtain confirmation whether we process personal data about you or not, and if so, you may request access to the data and information on how it is processed. You may also be entitled to obtain a copy of the data. In certain circumstances, you may request from the company that we send data which you have provided us yourself or that originates with you, directly to a third party.

Due to Landsvirkjun being subject to the obligation to retain almost all data processed by the company, as further detailed in Article 7 in this Privacy Policy, your right to erasure of personal data is limited. However, in certain circumstances, you may have the right to restrict the processing of your personal data, such as if you believe that the data Landsvirkjun processes about you is incorrect. In such circumstances, you may require that while examining the accuracy of the data, their processing will be limited.

If the processing of your personal data is based on legitimate interests of the company, you also have the right to object to such processing.

Your aforementioned rights are not absolute. Thus, laws may obligate the company to reject a request for erasure or access to data. In addition, the company may reject your request in consequence of the company's rights, such as based on intellectual property rights or the rights of third parties, such as to privacy, if the company considers these rights to prevail.

In the event where we cannot meet your request, the company will seek to explain why the request was rejected, taking into consideration legal restrictions which may apply.

# 10. Inquires of applicants and complaint to the Data Protection Authority

If you wish to exercise the rights described in Article 9 of this Policy, or if you have any questions regarding this Privacy Policy or how the company processes your personal data, please contact Ingvar Christiansen, the company's Data Protection Officer, cf. Article 11 in this Policy.

If you disagree with the company's processing of personal data, you may submit a complaint to The Data Protection Authority (www.personuvernd.is).

#### 11. Contact information

We have appointed a Data Protection Officer which oversees the enforcement of this Privacy Policy.

Below you can find his contact information:

Ingvar Christiansen personuvernd@landsvirkjun.is +354 515 9000

The company's contact information:

Landsvirkjun Háaleitisbraut 68 103 Reykjavík Iceland

#### 12. Revision

Landsvirkjun may from time to time change this Privacy Policy in accordance with changes to applicable laws or regulations or as a result of changes in the way the company processes personal data.

Any changes that may be made to this Policy will take effect after the updated version has been published on Landsvirkjun application website or presented to applicants in another verifiable manner.

This Privacy Policy replaces an original Privacy Policy adopted on 5 June 2018.

Reykjavík, 7 October 2020.