

Privacy Statement

For Recruitment at InflowControl

TABLE OF CONTENTS

DEFINITIONS AND ABBREVIATIONS	3
INTRODUCTION	4
THE PURPOSE OF PROSECCING PERSONAL DATA	5
PERSONAL DATA PROCESSED	5
DISCLOSURE OF PERSONAL DATA.....	5
TRANSFER AND DISCLOSURE OF PERSONAL DATA.....	6
NOTIFICATION AND CONSENT	6
PROTECTION OF YOUR PERSONAL DATA	6
PERSONAL DATA RETENTION	7
UPDATE OF PERSONAL DATA	7
ACCESS, CORRECTIONS AND DELETING PERSONAL DATA	7
INQUIRIES OR CONCERNS	8
REVISIONS TO THIS PRIVACY STATEMENT	8

DEFINITIONS AND ABBREVIATIONS

Term	Definition
Personal data	Personal Data is any information related to a person that can be used to identify the person directly or indirectly. It can be anything from a name, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer IP address. Personal Data does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual).
Legal basis	A legal basis for processing personal data. The most relevant bases are a law, an agreement, consent, or a legitimate interest.
Legitimate interest	Legitimate interest can be used as a basis for processing personal data. It is relevant to consider whether legitimate interest can be used as the legal basis if the business cannot obtain valid consent, has statutory authority, or processes personal data based on contractual terms. A business can process personal data if it is necessary to safeguard a legitimate interest that outweighs the individual's privacy interests. This means choosing the least invasive processing method.
Consent	A voluntary, explicit, and informed declaration by the data subject that they accept the processing of their personal data.
Processing	Any handling of personal data, such as collection, registration, organization, structuring, storage, adaptation or modification, retrieval, consultation, use, disclosure, dissemination, compilation or merging, restriction, deletion, or destruction.
Controller	The entity that determines the purpose of processing personal data and the means to be used. CEO serves as the controller at InflowControl and has, together with the Board of Directors the responsibility for processing personal data in InflowControl.
Processor	The entity that processes personal data on behalf of the controller.
Data Subject	The person to whom the personal data can be related
GDPR	General Data Protection Regulation
DPA	Data Processing Agreement. An agreement between the data processor and the data controller (or between the data processor and another data processor) on how personal data should be handled.

INTRODUCTION

This Privacy Statement provides information about personal data processing, data usage, processing methods and data disclosure during the recruitment process. This Privacy Statement applies to the Personal Data of all individuals (the Data Subject) registering their personal data in InflowControl's recruitment management system and used for recruitment purposes.

The Privacy Statement also informs Data Subjects of their rights related to protection of Personal Data.

THE PURPOSE OF PROSECCING PERSONAL DATA

Personal Data of Data Subjects, shall be collected, used, or otherwise processed in connection to recruitment to positions in InflowControl. The basis for the processing of the personal data is:

- Legitimate interest
- Consent for background checks and testing of applicants

PERSONAL DATA PROCESSED

InflowControl collects and maintains several types of Personal Data in respect of Data Subjects when applying for a position in InflowControl or sending an open/general application not related to a specific position (General CV). This includes e.g. the Personal Data contained in:

- contact information such as name and address, telephone number(s), date of birth, gender, country of residence, nationality, and email address;
- details about an individual's work experience and qualifications
- CV and attachments such as, but not limited to, certificates and references,
- answers to screening questions (predefined questions)
- interview notes
- contact information for referees and related correspondence
- assessment of applicant
- if uploaded by the applicant, application text and/or photo of the applicant
- after prior consent from the applicant, occupational tests
- after prior consent from the applicant, access to background checks

DISCLOSURE OF PERSONAL DATA

Personal Data may be shared with employees, recruitment agencies, consultants and other parties who require such information to assist with fulfilling the purpose of processing.

TRANSFER AND DISCLOSURE OF PERSONAL DATA

Personal Data is only transferred to external parties, outside the InflowControl Group if required or permitted under the applicable privacy legislation. When Personal Data is shared with external parties, the external party must enter into a Data Processing Agreement (DPA) with InflowControl in compliance with GDPR. Such parties may only use or disclose Personal Data in a manner consistent with the use or disclose Personal Data in a manner consistent with the use and disclosure provisions of this Privacy Statement.

- If permitted or required by applicable law or regulatory requirements. In such a case, disclosure of Personal Data will not exceed what is required under the circumstances.
- To comply with valid legal processes such as search warrants, subpoenas, or court orders; or
- With consent where required by law.

NOTIFICATION AND CONSENT

In some situations, however, consent might be required for the collection, use or disclosure of Personal Data. In such cases you may at any time, subject to legal or contractual restrictions and reasonable Statement, consent may be withdrawn. If choosing to withdraw, please contact the recruitment team.

PROTECTION OF YOUR PERSONAL DATA

InflowControl endeavours to maintain physical, technical, and procedural safeguards that are appropriate to the sensitivity of the Personal Data in question. These safeguards are designed to protect Personal Data from loss and unauthorised access, copying, use, modification, or disclosure.

PERSONAL DATA RETENTION

InflowControl collects and maintains several types of Personal Data in connections with recruitment such as CV, applications, contact information, tests, internal assessments, reference checks, internal notes, etc. The information is retained only for as long as we believe is necessary to fulfil the purposes for which the Personal Data was collected and for no longer than one year after the recruitment has been finalised.

For personal data submitted as a General CV, personal data will be retained until the Data Subject contacts InflowControl and requests deletion. For personal data related to a specific position the personal data will be retained for a period of one year after the recruitment process is finalised for the Data Subject that are not hired for the position. For the Data Subject hired for the position internal retention rules apply and will be submitted to the employee.

Notwithstanding the other provisions outlined above, electronic records containing personal data will be retained if such record(s) may be relevant to any ongoing or prospective legal proceedings; and to the extent that we are required to do so by law.

UPDATE OF PERSONAL DATA

It is important that the Personal Data in the records is both accurate and current. If Personal Data happens to change, please keep InflowControl informed of such changes.

ACCESS, CORRECTIONS AND DELETING PERSONAL DATA

Data subjects have the right to access information about their Personal Data. To review, verify, correct, or delete Personal Data, data subjects should send an email to their contact at InflowControl. The company will take necessary steps to confirm the data subject's identity before providing any information regarding personal data. The request will, when the requestor's identity is confirmed, be answered within 30 days. In some instances, the request may take longer, but the company will inform the data subject accordingly and send an answer at the latest within 90 days.

The right to access Personal Data is not absolute. There are instances where laws or regulations allow or require refusal to provide some Personal Data. Statutory requirements may also prevent deletion of some Personal Data. If a request cannot be fulfilled, an explanation of the reasons will be provided, subject to legal or regulatory restrictions.

INQUIRIES OR CONCERNS

For questions about this Privacy Statement, concerns about Personal Data management, or to file a complaint, please contact the CFO. Questions will be answered and steps taken to address issues at earliest convenience and at the latest within one month after the request is made.

To file a complaint regarding compliance with this Privacy Statement or violations of rights, complaints may be sent to the CFO or to Datatilsynet.

REVISIONS TO THIS PRIVACY STATEMENT

InflowControl may from time to time make changes to this Privacy Statement to reflect changes in legal obligations or in the manner of dealing with Personal Data. A revised version of this Privacy Statement will be communicated. The applicable and updated Data Protection Statement is available on www.inflowcontrol.com. Any changes to this Privacy Statement will be effective from the time they are communicated. Any change that relates to collection, use, or disclose your Personal Data, requiring consent, will not apply until consent has been obtained.