

# CIP Privacy Notice (Recruitment)

## 1. INTRODUCTION

Copenhagen Infrastructure Partners ("CIP") is committed to protect the privacy of your personal data. This Privacy Notice explains how CIP processes the personal data submitted via CIP EasyCruit and otherwise obtained by CIP in connection with the recruitment process.

The purpose of collecting personal data about you during the recruitment process is to assess whether you are a qualified candidate for a vacant position with CIP. In this document, you can read more about the data we process about you during the recruitment process.

## 2. DATA CONTROLLER

The CIP company which has the vacant position to be filled is the data controller for the processing of your personal data in connection with the recruitment process. In case of doubt in terms of which CIP company that is the data controller, please contact us as described below in clause 16.

## 3. WHEN WE RECIEVE YOUR APPLICATION

The personal data registered about you during the recruitment process are those provided in your application, CV and other enclosed documents.

We typically register the following personal data: Name, address, date of birth, legal gender, telephone number, e-mail address, education(s) and education results, career history, recommendations/references and residency

We process these personal data in accordance with article 6(1)(b) of the General Data Protection Regulation (GDPR) as you submitted the personal data to us with a view to entering into an employment contract with us.

## 4. WE ASSESS THE APPLICATION

We specifically assess the qualifications of each individual applicant relative to the vacant position. When we have read the applications, we select candidates for interview(s). The candidates not invited for an interview will be notified to such effect.

## 5. WHEN WE HAVE SELECTED YOU FOR AN INTERVIEW

In connection with the interview process, we receive additional data about you, which we register for purposes of the further recruitment process.

We process these personal data in accordance with article 6(1)(b) of the GDPR as you provided the personal data to us with a view to entering into an employment contract with us.

If, in connection with the interview process, you indicate that our Talent Acquisition Team may use your personal data to assess you in relation to another vacant position in CIP, we may also process your personal data for this purpose. If so, our processing of your personal data will be based on article 6(1)(f) of the GDPR (the balancing of legitimate interests). Our legitimate interest in such connection is to assess whether you are qualified for this other vacant position.

## 6. DATA FROM SOCIAL MEDIA

In connection with the recruitment process, it may be relevant for us to perform searches on social media, such as LinkedIn.

To the extent that the data is publicly available, we collect data about candidates from social media in accordance with article 6(1)(f) of the GDPR on the balancing of interests. We do it to be able to assess whether your profile matches the company and the specific position.

## **7. DATA FROM PERSONALITY TESTS**

In connection with recruitment for some positions, the company may – where permissible according to local law – ask you to complete a personality test. We always assess whether this is relevant for the position in question. The purpose of the test is to assess your competencies and qualifications as a potential employee and to assess whether your profile matches the company and the specific position.

We register the data from the personality test in accordance with article 6(1)(f) of the GDPR on the balancing of interests as the test is necessary to ensure that your profile matches the contents of the position.

## **8. DATA FROM PROFICIENCY TESTS**

In connection with recruitment for some positions, the company may ask you to complete a proficiency test. We always assess whether this is relevant for the position in question. The purpose of the test is to assess your competencies and qualifications as a potential candidate for the specific position.

We register the data from the proficiency test in accordance with article 6(1)(f) of the GDPR on the balancing of interests as the test is necessary to ensure that your profile matches the contents of the position.

## **9. DATA FROM PREVIOUS EMPLOYER**

For some positions, we need to obtain references from previous employers which you have indicated for example in your CV. If we obtain references from one or more of your previous employers, we will register the data we receive, such as your former duties and your performance at the employer(s) in question.

We process these data in accordance with article 6(1)(f) of the GDPR on the balancing of interests.

Before we obtain any references, we will obtain your consent. We obtain references to be able to assess whether your profile matches the specific position, and we store the data to be able to document your employment relationship history.

## **10. DATA FROM SCREENINGS (CRIMINAL RECORD ETC.)**

In connection with recruitment for some positions, the company may – where permissible according to local law – ask you to submit your criminal record. The positions for which this is relevant have been selected based on the (potential) position and function within CIP. We process this data in accordance with art. 10 of the GDPR and, for Danish employees, in accordance with section 8(3)(2) of the Danish Data Protection Act on the balancing of interests related to criminal data.

Further, for some positions, CIP may control that you have the educational background as informed in the application or during the recruitment process, etc. Therefore, in addition to the documentation on your educational level, we may – where relevant and where permissible according to local law – engage with an external party (professional provider of background screening) to ensure verification of the educational information. We process these data in accordance with article 6(1)(f) of the GDPR on the balancing of interests as the screening is necessary to pursue CIP's legitimate interest in controlling that certain groups of candidates have sufficient and relevant qualifications.

## **11. RESIDENCE AND WORK PERMIT**

Your employment is conditional on you having a valid work and residence permit. If, due to your citizenship, you need a work and residence permit to work lawfully in Denmark, we will also obtain a copy of your work and residence permit.

We obtain any work and residence permit in accordance with article 6(1)(c) of the GDPR as we have an obligation under section 59(5) of the Aliens Act to ensure that this is in order.

## **12. STATISTICS**

In connection with the recruitment process, we register some of your personal data (e.g. gender) for statistical purposes.

We process this data on the basis of article 6(1)(f) of the GDPR on the balancing of interests, and our legitimate interest is to be able to make statistical summaries, e.g., for use in connection with our ambitions for a diverse and inclusive workplace. The data registered for statistical purposes is not included in the assessment of your suitability for the position you have applied for.

### **13. RECIPIENTS OF YOUR PERSONAL DATA**

If you are asked to complete a personality test and/or a proficiency test, your personal data will be shared with external suppliers of such tests.

If the data controller is not CIP P/S (our Danish entity), the data controller may share your personal data with CIP P/S, as this is where our Talent Acquisition department and management are based. The legal basis on which we share your personal data is article 6(1)(f) of the GDPR on the balancing of interests, and our legitimate interest is to administer the recruitment process in accordance with our procedures.

If the data controller is not CIP P/S, and if you are offered a position within CIP, we may share your personal data with our Employment Law department, which is also based within CIP P/S, in order to prepare an employment agreement. The legal basis on which we share this data is article 6(1)(c) and article 9(2)(b) of the GDPR as the disclosure is necessary to comply with a legal obligation to which CIP is subject.

### **14. INTERNATIONAL TRANSFERS OF PERSONAL DATA (OUTSIDE THE EU/EEA)**

If the recruitment process concerns a position in a CIP company within the EU/EEA, your personal data will not be transferred outside the EU/EEA, unless you specifically have given consent to such transfer. In such case, the transfer will be based on the European Commission's standard contractual clauses, which you can get a copy of by contacting CIP as described below in clause 16.

### **15. DATA RETENTION**

We store your personal data for as long as necessary to fulfil the purposes described above.

If you have completed a personality test and/or a proficiency test, the information obtained in that connection will be deleted no later than 6 months after the recruitment process has been completed.

If you do not end up taking a position within CIP, your personal data will be stored for up to six months after the recruitment process has been completed, unless specific reasons make it necessary (and therefore permissible) to store the data for a longer period. Your candidate profile at CIP EasyCruit will be deleted when it has been inactive for six months.

If you are employed by CIP, your personal data will be transferred to your personal employee folder.

### **16. YOUR RIGHTS**

Subject to the conditions set out in the applicable data protection legislation (which we are able to inform you about, should you require more information), you enjoy the following rights in respect of the personal data that we hold:

- The right to request access to the personal data
- The right to rectify or correct the personal data
- The right to erase the personal data
- The right to restrict the processing of the personal data
- The right to have the data provided to you in a portable format
- The right to object to the processing of the personal data

You also have the right to lodge a complaint with the competent supervisory authority, such as the Danish Data Protection Agency. Please consult their website for how to submit a complaint at [www.datatilsynet.dk](http://www.datatilsynet.dk).

### **17. CONTACT**

Please submit a request to exercise a legal right in relation to your personal data, or an enquiry if you have a question or complaint about the handling of your personal data to [cip-gdpr@cip.dk](mailto:cip-gdpr@cip.dk).

You may also contact us at the following postal address:

Copenhagen Infrastructure Partners P/S  
Gdanskgade 18  
2150 Nordhavn  
Denmark

This Privacy Notice was last modified in June 2024. We may update this privacy Notice at any time by publishing an updated version here. The new modified or amended Privacy Notice will apply from that revision date. Therefore, we encourage you to review this Privacy Notice periodically to be informed about how we are protecting your information.