



## Privacy Notice for Job Candidates

### 1. WHY AND HOW WE PROCESS YOUR PERSONAL DATA

This privacy notice (the “**Privacy Notice**”), together with other information provided at the time of collection of your personal data, describes how Mölnlycke Health Care AB, reg. No. 556547-5489, including all its affiliates (“**Mölnlycke**”, “**we**”, “**us**” and “**our**”) will process your personal data when you apply for a job at Mölnlycke. The Privacy Notice applies to both current employees of Mölnlycke who apply for another job within our organization and external applicants seeking a job at Mölnlycke.

Mölnlycke’s processing of personal data as described in this Privacy Notice is in all cases subject to the requirements of applicable local law. To the extent this Privacy Notice conflicts with local law in your jurisdictions, local law controls how Mölnlycke is processing your personal data.

The data controller for the processing of your personal data as described in this Privacy Notice is Mölnlycke Health Care AB. You may read more about how and why Mölnlycke process personal data in general, please visit <https://www.molnlycke.com/privacy-center/> or you can contact us at phone number: +46 31 722 30 00.

You can also contact our Data Protection Officer (DPO) directly via email at [privacy@molnlycke.com](mailto:privacy@molnlycke.com), if you have any questions or concerns.

The type of personal data we process is generally limited to what we need in order to engage with you about Mölnlycke career opportunities, consideration of your application for employment to specific roles at Mölnlycke, including to conduct lawful employment screening (where applicable). Below, we provide more details regarding the processing and what personal data (hereinafter referred to as “**Personal Data**”) that we process for each purpose.

#### To select and recruit candidates based on submitted application documents

<p><b>What we are doing with the Personal Data:</b></p> <p>We collect your application documents, create your candidate profile in our recruitment system, perform interviews, take references, and administer personality and intelligence tests.</p>	<p><b>Categories of Personal Data:</b></p> <p><i>Personal Data</i></p> <ul style="list-style-type: none"><li>a) Personal information (such as first and last name)</li><li>b) Contact information (such as your address, e-mail address and phone number)</li><li>c) Application documents (such as CVs and cover letters)</li><li>d) Picture (if provided by you as part of your CV)</li><li>e) Information provided about you during interviews and reference taking, such as reviews from previous employers</li><li>f) Test results from personality and intelligence tests</li></ul>
<p><b>Legal basis:</b> Legitimate interest where our legitimate interest is to be able to evaluate your merits and skills in connection with selections for and decisions on recruitment. Compliance with a legal obligation to document information on education, work experience and other merits relating to those who become employed in order to comply with anti-discrimination laws..</p>	
<p><b>Retention period:</b> The information is retained during the application process and until you are either employed by us or you provide your consent to us retaining your profiling (when you are not selected). If you are not selected, the data will regardless be stored for 1 years to enable us to establish, assert or defend legal claims. If you decide to maintain in our talent community, we will store your personal information for an additional 1 year period.</p>	

**To assess conditions for employment in the country where you have applied for a job**

<p><b>What we are doing with the Personal Data:</b></p> <p>We control your citizenship and residence/work permit and provide notifications to competent national authorities as required by law regarding your Personal Data.</p>	<p><b>Categories of Personal Data:</b></p> <p><i>Personal Data</i></p> <ul style="list-style-type: none"> <li>a) Personal information (such as first and last name, address)</li> <li>b) Contact information (such as email address, phone number)</li> <li>c) Employment information (such as start date of employment and employment terms)</li> <li>d) Social security number (or equivalent information)</li> </ul> <p><i>Sensitive Personal Data</i></p> <ul style="list-style-type: none"> <li>a) Copy of a decision from the competent national migration authority on residence and work permits (which may reveal your ethnical origin)</li> <li>b) Residence permit card / LMA card (which may reveal your ethnical origin)</li> </ul>
<p><b>Legal basis:</b> Compliance with a legal obligation to control and document the right to stay and work in the country where you have applied for a job and to inform the applicable national authorities of the employment in accordance with migration legislation.</p>	
<p><b>Retention period:</b> The information is retained during your employment and up to 1 year after the employment has ended.</p>	

**To send out emails with job alerts**

<p><b>What we are doing with the Personal Data:</b></p> <p>If you opt-in, we will use your email address and your provided preferences to send out other job openings that might be of interest to you.</p>	<p><b>Categories of Personal Data:</b></p> <p><i>Personal Data</i></p> <ul style="list-style-type: none"> <li>a) Personal information (such as first and last name)</li> <li>b) Contact information (such as your address, e-mail address and phone number)</li> <li>c) Preferences, such as location of work, area of work.</li> </ul>
<p><b>Legal basis:</b> To provide you with the requested job alert services falls within the legal basis performance of a contract.</p>	
<p><b>Retention period:</b> The information is retained for 1 year, unless you decide to terminate the service before that. If you decide to maintain in our talent community, we will store your personal information for an additional 1 year period</p>	



## To maintain your candidate profile after the recruitment process

<p><b>What we are doing with the Personal Data:</b></p> <p>If you consent, we will keep your recruitment profile for a period after the recruitment process is over. This will enable us to keep your profile in our talent pool and consider you for other or future opportunities in any of the Mölnlycke companies and affiliates.</p>	<p><b>Categories of Personal Data:</b></p> <p><i>Personal Data</i></p> <ul style="list-style-type: none"><li>a) Personal information (such as first and last name)</li><li>b) Contact information (such as your address, e-mail address and phone number)</li><li>c) Application documents (such as CVs and cover letters)</li><li>d) Picture (where applicable)</li><li>e) Information provided about you during interviews and reference taking, such as reviews from previous employers</li><li>f) Test results from personality and intelligence tests</li></ul>
<p><b>Legal basis:</b> We will only maintain your recruitment profile after the initial recruitment process is finished if you have given your explicit consent to it.</p>	
<p><b>Retention period:</b> We will keep your Personal Data as long as you consent to the processing. We delete all inactive profiles on a continuous basis and will delete your account when it has been inactive for at least 1 year.</p>	

## To perform employment screening (if you are in scope)

<p><b>What we are doing with the Personal Data:</b></p> <p>If you are in scope (such as if you are applying for a management/executive position or a position subject to certain regulatory requirements on e.g., certification) and subject to applicable national law, third-party agencies engaged by Mölnlycke will perform necessary reference/background checks, in order for them to suggest suitable candidates for the position to Mölnlycke. Such third parties will inform you about the processing of your Personal Data in their separate notices, provided that you are in scope for such checks.</p>	<p><b>Categories of Personal Data:</b></p> <p><i>Personal data:</i> Provided that you are in scope, the applicable third-party agency will process information that such party determines is relevant for the position that you apply for (such as information about criminal convictions and offences, provided that such information can be processed according to applicable law).</p>
<p><b>Legal basis:</b> Legitimate interest where our legitimate interest is to recruit suitable candidates for certain positions that require further evaluation (such as executive positions).</p>	
<p><b>Retention period:</b> The information is retained by the third-party agency during the application process, and in accordance with the retention policies communicated in their separate notices.</p>	



**To evaluate our work with diversity, equality, and inclusion**

<p><b>What we are doing with the Personal Data:</b></p> <p>If you consent, we will collect data about your gender and/or nationality in order to be able to document and publish (on an aggregate basis) Mölnlycke’s work with diversity, equality, and inclusion within our workforce and within our recruitment process. This information will only be used for this specific purpose and will not be visible for the recruiters or other Mölnlycke personnel.</p>	<p><b>Categories of personal data:</b></p> <p><i>Personal Data</i></p> <ul style="list-style-type: none"> <li>a) Your gender</li> <li>b) Link between nationality and position applied for, including your candidate profile</li> </ul> <p><i>Sensitive Personal Data</i></p> <ul style="list-style-type: none"> <li>a) Information about your primary nationality (which may reveal your ethnical origin)</li> </ul>
<p><b>Legal basis:</b> We will only collect data about your nationality for this purpose if you have given your explicit consent to it.</p>	
<p><b>Retention period:</b> The information is retained during the application process and until you are either employed by us or you provide your consent to us retaining your profiling (when you are not selected). If you are not selected, the data will regardless be stored for 1 years to enable us to establish, assert or defend legal claims. If you decide to maintain in our talent community, we will store your personal information for an additional 1 year period.</p>	

**2. HOW WE COLLECT YOUR PERSONAL DATA**

We collect Personal Data from the following sources:

- From you directly (such as when you create an account and profile in the career’s portal and when you share your social media profile with us).
- From recruitment agencies when you are recommended to us by such agencies.
- From your colleagues and/or managers when giving you a reference.
- From companies who do pre-employment screening for us.

**3. HOW WE SHARE AND TRANSFER YOUR PERSONAL DATA**

**Recipients:** We will share your Personal Data with the following recipients:

Recipients:	Such as:
Suppliers or vendors assisting Mölnlycke.	Our IT-service providers (such as of the recruitment system) and recruitment agencies (such as headhunters).
Other Mölnlycke entities.	Mölnlycke entities in other countries.

**Transfer:** Mölnlycke operates globally and therefore Personal Data may need to be transferred to countries outside of where the Personal Data was originally collected. As Mölnlycke is headquartered in the European Union (“EU”), Personal Data will generally be processed within the EU. We will also transfer your Personal Data to countries outside the EU and the European Economic Area (“EEA”) for the purpose of sharing information about your application within our company group and with our IT-service providers used for recruitment, which are established outside of EU/EEA. Such countries outside EU/EEA include USA, China, Chile, Thailand, Singapore, Brazil, Canada, Japan, Australia, India, South Africa, New Zealand, Malaysia and South Korea.

If we transfer your Personal Data from a country which requires that so called *transfer mechanism* are used to safeguard your rights, we will rely on one of the official options, as applicable. This could e.g., be:

- European Commission’s Adequacy Decisions. This means that the European Commission has assessed and decided that your Personal Data will be equally protected in that country as within the EU/EEA. You can



access a list of the countries that the European Commission has decided provide an adequate level of data protection here: [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en).

- European Commission's standard contractual clauses. These clauses function as a contract between Mölnlycke and the recipient, with the purpose of safeguarding your rights. You may access the European Commission's standard contractual clauses here: <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021D0914>.

Please contact Mölnlycke's DPO for specific information.

#### 4. YOUR RIGHTS

In this section we describe your rights as a data subject. You can exercise them by contacting us, using the contact details above. Please note that not all rights listed below are absolute and there are exemptions which can be valid.

Your rights are the following:

**Right of access.** You have the right to obtain a confirmation as to whether or not we process your Personal Data. If that is the case, you also have the right to receive copies of the Personal Data concerning you that we process as well as additional information about the processing, such as for what purposes the processing occurs, relevant categories of Personal Data and the recipients of such Personal Data.

**Right to rectification.** You have the right to have your Personal Data corrected (rectified) and/or complemented if it is wrong and/or incomplete.

**Right to erasure.** You have the right to request that we erase your Personal Data without undue delay in the following circumstances: (i) the Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (ii) you withdraw your consent on which the processing is based (if applicable) and there is no other legal ground for the processing; (iii) you object to our processing of Personal Data, and we do not have any overriding legitimate grounds for the processing; (iv) the processed Personal Data is unlawfully processed; or (v) the processed Personal Data has to be erased for compliance with legal obligations.

**Right to restriction.** You have the right to restrict the processing of your Personal Data in the following circumstances: (i) you contest the accuracy of the Personal Data during a period enabling us to verify the accuracy of such Personal Data; (ii) the processing is unlawful, and you oppose erasure of the Personal Data and request restriction instead; (iii) the Personal Data is no longer needed for the purposes of the processing, but are necessary for you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing of the Personal Data, pending the verification whether our legitimate grounds for our processing override your interests, rights and freedoms.

**Right to object.** You have the general right to object to our processing of your Personal Data when it is based on our legitimate interest. If you object and we believe that we may still process your Personal Data, we must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

**Right to data portability.** If your Personal Data has been provided by you and our processing of your Personal Data is based on your consent or on the performance of a contract with you, you have the right to receive the Personal Data concerning you in a structured, commonly used and machine-readable format in order to transmit these to another service provider where it would be technically feasible and can be carried out by automated means.

**Right to withdraw consent.** When our processing of your Personal Data is based on your consent, you have the right to withdraw your consent at any time. Please note that the lawfulness of any processing based on your consent before its withdrawal is not affected by the withdrawal. We will keep information regarding your withdrawal for as long as is necessary for us to ensure that all your Personal Data relating to your former consent is erased, to the applicable extent.

**Complaints to the supervisory authority.** If you believe that our processing is performed in breach of applicable data protection legislation, we encourage you in first-hand to contact us in order for us to oversee your complaints. You may at any time also file a complaint with the relevant supervisory authority where you are located. You can find contact details to each local EU supervisory authority by visiting the website of European Data Protection Board, [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en).



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## 5. SECURITY MEASURES

We have taken measures to ensure that your Personal Data is handled in a safe way. For example, access to systems where Personal Data is stored is limited to our employees and service providers who require it in the course of their duties. Such parties are informed of the importance of maintaining security and confidentiality in relation to the Personal Data we process. We maintain appropriate safeguards and security standards to protect your Personal Data against unauthorized access, disclosure or misuse. We also monitor our systems to discover vulnerabilities.