

**RECRUITMENT PRIVACY NOTICE****SKANSKA****1 INTRODUCTION**

In our recruitment process, we collect, store and process different categories of personal data for various purposes. We recognize the need to protect any personal data we process, as well as the need for transparency in regard to the data processing and its purposes. For this reason, Skanska has developed this recruitment privacy notice (the “**Privacy Notice**”) to describe how we handle data during our recruitment process.

Throughout this Privacy Notice, the term “**processing**” is used to cover all activities involving your personal data, including e.g., collecting, handling, storing, sharing, accessing, using, transferring, and disposing of your personal data.

“**applicant**” or “**applicants**”, means all persons who has applied for a job at Skanska and is currently in a recruitment process at Skanska.

“**applicable data protection laws**” means all legislation and regulations, including regulations issued by relevant supervisory authorities, protecting the fundamental rights and freedoms of individuals and, in particular, their right to privacy with respect to the processing of personal data that from time to time apply to this Privacy Notice, including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “**GDPR**”) as well as laws and regulations supplementing the GDPR.

“**personal data**” means any information relating to an identified or identifiable natural person.

“**retention period**” refers to the period during which we process your personal data for a certain purpose. Please note that the category of personal data in question (e.g., your name) may still be processed by us for other purposes, as outlined in section 4 below.

**2 WHO IS THE DATA CONTROLLER FOR THE PERSONAL DATA?**

The Skanska company that you are applying to (referred to as “**Skanska**”, “**we**”, “**our**” or “**us**”) is the data controller for the processing of your personal data as described in this Privacy Notice. We may also act as a joint controller together with other Skanska entities for certain group-wide services. However, in practice this distinction does not have an impact on your rights and freedoms in relation to your personal data. You will never have to “figure out” which Skanska-entity is responsible for a certain processing activity, and you can always contact us by using the contact details at the bottom of this Privacy Notice, and we will make sure that your question or concern is handled in an appropriate manner.

**3 FROM WHERE DO WE COLLECT YOUR PERSONAL DATA?**

We collect your personal data from (i) yourself, which you submit to us, (ii) your references, which you have submitted to us, and (iii) our suppliers which provides us with assessments reports based on your responses.

**4 WHY DO WE PROCESS YOUR PERSONAL DATA?**

**4.1 General administration of your recruitment process**

Skanska process your personal data to administrate the recruitment process. This includes processing your personal data to determine your skills, qualifications, and interests. To verify your information, we may contact your references and then process personal data related to you provided by your references.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>&gt; Contact details (for example name, address, and telephone number)</li> <li>&gt; Information regarding the position applied for and work preferences</li> <li>&gt; Information regarding current employment</li> <li>&gt; Education</li> <li>&gt; Work experience</li> <li>&gt; Qualifications (e.g., language proficiencies and other special skills)</li> <li>&gt; Information from personality tests, psychometric tests, and suitability tests, including your responses as well as reports and assessments that have been generated by our supplier</li> <li>&gt; References</li> <li>&gt; Additional information that has been provided by you in your CV and/or personal letter</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in administrating your recruitment process, determining your suitability, and verifying your information.</p> <hr/> <p><b>Exemption for special categories of data</b></p> <hr/> <p>n/a</p>
<p><b>Retention period</b></p>	
<p>Your personal data is retained during the recruitment process. When the recruitment process is done, we will store your personal data for 24 months to exercise, establish or defend legal claims. If you are hired by Skanska, we will store your personal data during your employment in accordance with Skanska’s employee privacy policy.</p>	

**4.2 Conducting background checks**

If the position you apply for requires local background checks Skanska will to the extent permitted by law process your personal data for the purpose of conducting background checks.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>&gt; Contact information (for example name, address, and telephone number)</li> <li>&gt; Formal qualifications</li> <li>&gt; Financial information</li> <li>&gt; References</li> <li>&gt; Personal data available social media platforms</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest of carrying out background checks.</p> <hr/> <p><b>Exemption for special categories of data</b></p> <hr/> <p>n/a</p>

<b>Retention period</b>
Your personal data is retained during the recruitment process. When the recruitment is done, we will store your personal data for 24 months to exercise, establish or defend legal claims.

**4.3 Record keeping and communication of future career opportunities**

If you give your consent, Skanska will store your personal data to enable us to provide you with information in the future regarding other career opportunities that fit your profile. You may at any time request that we remove your personal data and unsubscribe to any information regarding career opportunities at Skanska.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>&gt; Contact information (for example name, address, and telephone number)</li> <li>&gt; Education</li> <li>&gt; Work experience</li> <li>&gt; Qualifications (e.g., language proficiencies and other special skills)</li> <li>&gt; References</li> </ul>	<p><i>Consent.</i> The processing is based on your consent that is given in connection with providing us with your information.</p>
	<b>Exemption for special categories of data</b>
	n/a
<b>Retention period</b>	
Your personal data is retained during the recruitment process. When the recruitment process is done, we will store your personal data until you withdraw your consent to the processing. We will, however, not store your personal data for a longer period than 24 months after the recruitment process is done.	

**4.4 Establish, exercise and defend legal claims**

We may process your personal data for the purpose of establishing, exercising, and defending legal claims (for example in connection with a dispute or legal process).

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>&gt; Contact information (for example name, address, and telephone number)</li> <li>&gt; Information regarding the position applied for and work preferences</li> <li>&gt; Information regarding current employment</li> <li>&gt; Education</li> <li>&gt; Work experience</li> <li>&gt; Qualifications (e.g., language proficiencies and other special skills)</li> <li>&gt; Information from personality tests, psychometric tests, and suitability tests, including your responses as well as reports and assessments that have been generated by our supplier</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest of establishing, exercising, or defending legal claims, for example in connection with a dispute or legal process.</p>
	<b>Exemption for special categories of data</b>
	Special categories of personal data, including criminal data, are only processed to fulfil our legitimate interest of establishing, exercising, or defending legal claims.

<ul style="list-style-type: none"> <li>&gt; References</li> <li>&gt; Additional information that has been provided by you in your CV and/or personal letter</li> </ul>	
<b>Retention period</b>	
<p>Your personal data is retained during the period necessary to establish, exercise and defend the legal claim, for example in connection with a dispute or legal process.</p> <p>Personal data is not stored for this purpose for longer than 10 years from the conclusion of the legal process in question.</p>	

## 5 RECIPIENTS THAT WE SHARE PERSONAL DATA WITH

### 5.1 Other data controllers

Where necessary, we share your personal data with others. The recipient is the data controller for the processing of your personal data unless we have stated otherwise.

Recipients	Purpose(s)	Legal basis
<ul style="list-style-type: none"> <li>&gt; Courts and arbitration tribunals</li> <li>&gt; Employers' organisations</li> <li>&gt; Trade union organisations</li> <li>&gt; Public authorities</li> <li>&gt; External advisers</li> <li>&gt; Insurance companies</li> </ul>	<p>To exercise, establish or defend legal claims.</p>	<p>To fulfil our <i>legitimate interest</i> of managing and defending legal claims, e.g., in relation to a dispute.</p>
<ul style="list-style-type: none"> <li>&gt; Skanska group companies</li> </ul>	<p>For record-keeping and communication of future career opportunities.</p>	<p>The processing is based on the <i>consent</i> that is given in connection with providing us with your information.</p>

### 5.2 Service providers

To fulfil the purposes of the processing of your personal data, we transfer personal data to external parties such as service providers that we have engaged. These parties provide services within the areas of, inter alia, IT (such as data storage, support, and management services). These external parties will act as data processors of Skanska and may only process your personal data in accordance with our instructions and not for their own purposes. Skanska is the data controller for the processing of personal data that these external parties carry out on our behalf. These transfers are necessary for us to carry out the recruitment process.

For research and statistical purposes, we prepare anonymous, aggregate, or generic data for a number of purposes outlined above. As we consider that you cannot reasonably be identified from this information, we may share it with external parties such as our partners, advertisers, industry bodies, media and/or the general public. However, we apply a restrictive approach to ensure a high level of security and safety.

**5.3 Appropriate safeguards for transfers of personal data outside the EU/EEA**

Skanska uses suppliers and third-party providers to process personal data in a manner that may include transfer of personal data to countries outside of the EU/EEA area (so called “**third countries**”). These transfers are necessary for providing our services.

With these suppliers and partners, Skanska has entered data processing agreements including provisions safeguarding such third country transfers with appropriate safety measures.

Transfers of personal data outside of the EU/EEA area will be processed/performed in accordance with applicable data protection laws, including the GDPR. Such transfers either rely upon an adequacy decision from the European Commission or legal safeguards through the European Commission’s Standard Contractual Clauses (SSC’s) for transfer of personal data outside of the EU/EEA area, combined with supplementary technological and organisational protection measures including encryption and anonymization/pseudonymization.

Should you have any questions regarding Skanska’s transfers of personal data to countries outside the EU/EEA area, please contact our HR department or otherwise by using the contact details provided at the end of this Privacy Notice. You are entitled to receive a copy of any documentation demonstrating that appropriate safeguards have been taken to protect your personal data during a transfer to a third country.

To learn more about third country transfers, please read [here](#).

**6 YOUR RIGHTS**

Under applicable data protection laws, you have certain rights in relation to the processing of your personal data. We process your personal data to the extent necessary to fulfil your rights. Please submit requests for exercising your rights by contacting us using the contact details set out below.

You have, under certain circumstances, the right to exercise the following rights:

<b>Access</b>	You may request confirmation whether personal data about you is processed by us and, if that is the case, access your personal data and additional information regarding the operation, such as the purposes of the processing. You are also entitled to receive a copy of the personal data undergoing processing.
<b>Object to certain processing</b>	You have the right to object to the processing of your personal data based on a legitimate interest for reasons which concern your particular situation. In such a situation, we will stop using your personal data where the processing is based on a legitimate interest, unless we can show that the interest overrides your privacy interest or that the use of your personal data is necessary to manage or defend legal claims.
<b>Rectification</b>	You have the right to obtain from us the rectification of inaccurate personal data concerning you.
<b>Erasure</b>	You may have your personal data erased under certain circumstances, such as when your personal data is no longer needed for the purposes for which it was collected.

<b>Restriction of processing</b>	You may ask us to restrict the processing of your personal data to only comprise storage of your personal data under certain circumstances, such as when the processing is unlawful, but you do not want your personal data erased.
<b>Withdrawal of consent</b>	You have the right to at any time withdraw your consent to the processing of personal data to the extent the processing is based on your consent.
<b>Data portability</b>	You have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used, and machine-readable format and ask for the information to be transferred to another data controller (where possible).

Click [here](#) to read more about the rights that you have in relation to the processing of your personal data.

### **Complaints to the supervisory authority**

In case of any complaints regarding Skanska's privacy practices, you have the right to lodge a complaint with the competent supervisory authority. For more information, please visit the relevant authority's website. In Sweden, the supervisory authority is the Swedish Authority for Privacy Protection. You can learn more about how to lodge a complaint with the Swedish Authority for Privacy Protection [here](#).

## **7 CONTACT US**

If you have any questions or concerns regarding the processing of your personal data, please contact our HR department. You may also contact one of our data protection managers by using the contact details below.

### **Skanska's data protection manager**

*Skanska AB*

*Att: Data Protection Manager (DPM)*

*Address: Warfvinges väg 25, 112 74 Stockholm, Sweden*

*Phone: +46 10 448 00 00*

*Email: [dpm\\_absfs@skanska.se](mailto:dpm_absfs@skanska.se)*

## **8 CHANGES TO THIS PRIVACY NOTICE**

Periodically, we may update this Privacy Notice when we, e.g., change our processing routines. When we do this, we will take all reasonable measures to inform you of such updates (unless the changes are non-material or insignificant). If you have any questions regarding our use of your personal data, do not hesitate to contact the individual at Skanska who has been responsible for your recruitment process or our HR department or otherwise reach out to us by using the contact details set out above.

*This Privacy Notice was last updated: May 21, 2024*