

PRIVACY POLICY APPLICANTS

1. INTRODUCTION

This Privacy Policy provides information about how we collect and process personal data related to job applicants throughout the recruitment process, including through the Application Tracking System (ATS) Jobylon and, where applicable, through assessments used as part of the recruitment process, as well as your rights regarding your personal data and how to enforce them.

The data controller for the processing of your personal data is the Varner company to which you apply for employment. This may be Varner AS or one of its subsidiaries in Norway, Sweden or Finland, including Bik Bok, Carlings, Cubus, Dressmann, Junkyard, LESS, Varner Brand Stores/Levi's Store, Varner Retail, Varner Supply and Volt.

In some cases, Varner AS provides recruitment and HR administration services to its subsidiaries. When processing personal data on behalf of a subsidiary, Varner AS acts as a data processor rather than a data controller.

For the purposes of this Privacy Policy, the relevant employing company and/or Varner AS, as applicable, may hereinafter be referred to as the "Company".

2. WHAT PERSONAL DATA THE COMPANY HAS ABOUT YOU

Typical personal data we record about you are name, date of birth/confirmation, that you are over 17 years old, residential address, email address and phone number, valid work permit, CV, other information you provide to us and such as any preferential rights, where applicable, information you provide during interviews, reference calls and internal reviews.

Health information is only processed if it is relevant to the application process.

Information about your experience, name and contact details etc. may also be collected using publicly available sources such as LinkedIn. As part of the recruitment process, we may also seek additional information about you from the Internet, including social media.

3. LEGAL BASIS AND PURPOSE

The processing of your information in connection with your application is necessary to fulfil your desire to work with us, either because you voluntarily have applied for a position, subscribed to our job list, or applied for an advertised position.

Therefore, the legal basis for processing your information in connection with your application is that the processing is necessary to take steps at your request prior to entering a contract with us. We may also be required to process personal data to comply with legal obligations or where we have a legitimate interest that is not overridden by your privacy rights.

We need to confirm your identity and background and use your contact information, information from references, and internal evaluations to assess whether we can offer you a position.

If you have applied for a specific position in the Company, we may ask for your consent to use your application for recruitment to other relevant positions within the Company than the one you are currently applying for. If you have applied for a position in our stores or sent in an open application, we will use your application for recruitment to relevant positions within the Company to take steps to enter into an employment agreement.

4. WHO THE COMPANY SHARES YOUR PERSONAL DATA WITH

We use data processors that assist us with different processes in Varner. Different categories of data processors are specified below:

- Suppliers operating IT systems
- Suppliers assisting with the operation of various core systems
- Suppliers assisting with security, e.g. access control systems
- Suppliers assisting with recruitment-related services Jobylon acts as a data processor and processes personal data only on behalf of and in accordance with the instructions of the relevant data controller/Company. Where Varner AS provides recruitment administration services to a subsidiary, Jobylon may process personal data on behalf of that subsidiary through services administered by Varner AS. Appropriate data processing agreements are in place to ensure compliance with applicable data protection legislation.

Personal data in Jobylon is processed and stored within the EU/EEA.

5. PERSONALITY AND ABILITY ASSESSMENTS (ASSESSIO)

If personality or ability assessments are used as part of a recruitment process, you will receive separate information before completing the assessment.

Participation in such assessments is voluntary and based on your consent. Before completing any assessment, you will be asked to provide consent for the processing of personal data related to the assessment.

The personal data processed may include assessment responses, scores, reports and analyses generated through the Assessio platform.

You may withdraw your consent at any time through the Assessio platform or by contacting your recruitment contact person. Withdrawal of consent does not affect processing carried out before the consent was withdrawn.

Assessio acts as a data processor on behalf of Varner and processes personal data only in accordance with Varner's instructions and the applicable data processing agreement.

6. GEOGRAPHICAL STORAGE OF PERSONAL DATA

Personal data is stored and handled by the services of Jobylon.

Personal data is stored and handled by the services of Assessio where assessments are used as part of the recruitment process.

We store personal data in relevant recruitment systems and, where applicable, in personnel folders and electronic systems located at the Service Office in Varner AS.

In certain cases, personal data may be accessed from or made available to recipients located outside the European Economic Area (EEA). Where such transfers occur, appropriate safeguards are implemented in accordance with applicable data protection legislation.

7. HOW LONG WE STORE YOUR PERSONAL DATA

We store your personal data only as long as necessary in connection with the application, maximum 24 months.

If you do not get the job, we may ask for your consent to save your CV for possible later offers.

8. THE APPLICANT'S RIGHTS

The Privacy Policy grants you several rights related to your personal data. You may request in-depth information about how we process information about you, and you have the right to access your personal data.

If your personal data is incorrect, you have the right to have it corrected. Personal data we may not have a legal basis for processing shall be deleted and you may claim this if we have not done it on our own initiative.

You may request that we restrict the use of your information. You have the right to data portability and to request that your personal data be transferred to you or to another business in a structured, commonly used and machine-readable format.

You may object to the use of your personal data where the processing is not based on a legal obligation.

If you believe that we process your personal data without legal basis, you may also complain to the relevant Data Protection Authority. However, we encourage you to contact us first so that we can address your concerns and clarify any misunderstandings: privacy@varner.com.

Supervisory authorities:

For Norway:	For Sweden:	For Finland:
Norwegian Data Protection Authority (Datatilsynet)	Swedish Authority for Privacy Protection (Datainspektionen)	Office of the Data Protection (Tietosuojavaltuutetun toimisto)

The Data Protection Policy contains more detailed provisions regarding these rights and possible exceptions. If you wish to exercise your rights, please contact us using the contact information below. We will respond as soon as possible and normally within 30 days.

This Privacy Policy may be updated periodically. You will be informed of any significant changes (e.g. by e-mail or on our website), but we also recommend that you review this Privacy Policy from time to time to ensure that you are aware of any amendments.

9. CONTACT INFORMATION

We are available for any questions you may have – feel free to use the contact information below.

Varner HR Department

Phone: +47 66 77 31 00

E-mail to our Data Protection Officer: privacy@varner.com

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