

## DATA PROTECTION POLICY

### 1. Who does this policy apply to and who is responsible for the processing?

This data protection policy applies to anyone who apply for employment with Advokatfirmaet BAHR AS. BAHR is responsible for processing your personal data in compliance with applicable privacy laws in Norway, which also includes the General Data Protection Regulation (GDPR). BAHR is the controller and is the party we refer to as “BAHR”, “us” or “we” in this policy.

Our contact information is: Advokatfirmaet BAHR AS (business registration number 919 513 063) Tjuvholmen allé 16, 0252 Oslo.

Separate data protection policies apply to our clients and employees.

### 2. What personal data do we process?

When you apply for a position with us, we process the personal data you submit to us in the recruitment process. This is normally identifying information, contact details, qualifications, work experience and skills. Some applicants choose to send us their picture. In the later stages of the recruitment process we collect your country of residence/tax residence, working permit, compensation information, the references you provide us with and the information they share with us.

We may prepare internal notes during the recruitment process. We will only note information that we consider to be relevant to our assessment of whether you are suited for the position in question or another position with us. In an interview, we will focus both on your professional and personal competence.

### 3. Why do we process your personal data?

We process your personal data for recruitment purposes when we assess you for potential employment. The legal basis for processing your personal data for this purpose is your consent, which you provide by sending us a job application, resume and other documents or information.

You may also choose to join our talent pool. We use this when researching potential new hires. All candidates who send us open job applications will be added to the talent pool for a period of three years. Other candidates will only be added to this pool after collecting an explicit consent.

We also use your personal data for statistical purposes and analytics of our recruitment process. The legal basis for this processing is our legitimate interests of continuously improving this process and understanding our position in the job market, cf. the GDPR article 6 no. 1 (f).

## **4. Do we share your personal data with others?**

### **4.1 Data processors**

We do not transfer your personal data to others. However, your personal data will be accessible to those of our suppliers who process personal data on our behalf. To secure your rights, we have entered into data processing agreements with them which, among other things, mean that your personal data cannot be used for other purposes. Our suppliers have a corresponding duty to enter into data processing agreements with their subcontractors which ensure that these are subject to the same obligations that apply to our suppliers.

Some of our suppliers are located in countries outside the EU/EEA. This means that personal data can be transferred or is accessible from a country with a regulatory framework that does not provide the same level of protection of personal data compared to the rules in Norway. To ensure your privacy, such transfer will only take place in accordance with the privacy legislation currently in force, for example by us entering into the Standard Contractual Clauses for International Transfers which is approved by the EU Commission.

### **4.2 Other third parties**

We will not disclose your personal data to others unless there is a legal basis for such transfer. For example, if the disclosure is required by law, necessary to fulfil our agreement with you or to achieve a legitimate interest pursued by the company.

If you applied for a position as Corporate Legal Intern we may share your application documents with our current partners for this position. The disclosure will be based on your consent.

## **5. What is your privacy protection rights?**

You are entitled to request access to and rectification or erasure of your personal data or restriction of processing or to object to processing as well as the right to data portability. You can read more about these rights on the Norwegian Data Protection Authority's website: [www.datatilsynet.no](http://www.datatilsynet.no).

You may at any time withdraw your consent for processing your personal data. If you choose to withdraw your consent, we will not be able to assess you for employment. You may change or delete your the personal data you register in your profile within our system. Username and password to your profile will be sent by email when your application is registered in the system

Contact us by sending an email to [hr@bahr.no](mailto:hr@bahr.no) if you would like to use any of these rights.

If you have any concerns about how we process your personal data, we appreciate hearing from you. You may also file a complaint with the Norwegian Data Protection Authority.

## **6. How long do we keep your personal data?**

We retain your personal data for one year after the end of a recruitment process. The end of a recruitment process is the date where a job offer from us is accepted by a candidate for an advertised job opening. Personal data about candidates who are part of our talent pool will be retained for a period of three years.

We will delete your personal data if you withdraw the application before the recruitment process is finished.

We will not delete your personal data if this is necessary in order for BAHR to determine, assert or defend legal claims, or if we are legally bound to retain personal information. If you accept a job offer from us, we will not delete your personal data. Instead, we will process this personal data in accordance with our privacy policy for employees.

## **7. Measures to safeguard your personal data**

BAHR is concerned with ensuring that unauthorised persons do not gain access to your personal data. BAHR therefore uses several forms of security technology that provide good protection against unauthorised access to or abuse of your personal data.

## **8. Changes to this policy**

We will update our privacy policy if there are any changes to our processing for recruitment purposes. You will always find the latest updated policy on our website.

Updated: 11 May 2023