

# Desert Control GDPR and Privacy Policy for Job Seekers and Applicants

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# Desert Control GDPR and Data Privacy Policy for Job Seekers and Applicants

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## INTRODUCTION

As employer, we feel an additional responsibility to protect your personal data. Whether you are a job seeker, are employed by us today or have been in the past, you can rest assured that we value your privacy and that we have taken the necessary steps to align ourselves with the [Personal Data Act](#), including the GDPR.

This Privacy Policy explains how we collect and use (process) personal data in our business. Desert Control AS, by the CEO, is the data controller for the processing.

### This Privacy Policy applies to:

Desert Control AS  
Business address: Grenseveien 21, 4313 Sandnes, Norway  
Org.nr.: 919415630  
Email address: post@desertcontrol.com

Desert Control by the general manager, is *the data controller* for personal data where we determine for ourselves the purpose of the processing and the instruments used. The day-to-day responsibilities are further delegated to key people in the organization. Note that the delegation only includes the *tasks* and not the responsibility.

Please read this Privacy Policy first carefully and in particular your privacy rights in the *Your Rights* section below. If you have any questions about your rights or how we process your personal data (such as job seeker or otherwise), we encourage you to contact the Data Protection Officer or your immediate manager.

**We take privacy seriously and have taken steps to ensure that we provide clear information about how we process your data and what rights you have. Contact us if you feel something is unclear or missing.**

## HOW WE COLLECT ABOUT JOB SEEKERS, APPLICANTS, AND EMPLOYEES

*We process (i.e. collect, use, store, record, record) personal data about you at various stages of the "employee journey":*

1. When you are in dialogue with us about a position you are interested in
2. When applying for a position (job seeker)
3. Once you have got a job with us (is employed)
4. When you are a former employee

This Statement applies to the processing of personal data concerning you for points 3 and 4 above; when you are employed by us today and what happens to your personal data after the employment has ended.

We do not use automated decision-making or profiling in employment.

## OTHER PRIVACY STATEMENTS

For the processing of personal data about visitors to the website, customers (potential, existing and former), contacts and others, see the company's general GDPR and Privacy Policy separately.

## YOUR RIGHTS

With the Personal Data Act, and in particular the New Data Protection Regulation (GDPR), privacy is stronger than ever before. If you have any questions or concerns about the processing of your privacy, you can contact you at any time to gain access or exercise any of your other rights, as described below.

### **How long do you have to wait for an answer?**

If you wish to exercise one of your rights, you are entitled to a response as soon as possible, and no later than within one month. If we receive many inquiries and/or they are complex in nature, we can extend this deadline by another two months and we will inform you of such a postponement within one month.

## PRIVACY RIGHTS

Below you can read about your privacy rights, with links to supplementary information from the Norwegian Data Protection Authority.

### Access to your own information

You may request access to any information we process about you and, if necessary, a copy thereof.

[Read more about your right to access](#)

### Correction of personal data

You may ask us to correct or supplement information that is erroneous or misleading.

[Read more about your right to rectified information](#)

### Deletion of personal data

In some situations, you may ask us to delete information about yourself (but not always).

[Read more about your right to erasure](#)

### Restriction of processing of personal data

In some situations, you may also ask us to restrict the processing of information about you.

[Read more about your right to restriction](#)

### Object to the processing of personal data

If we process information about you on the basis of our duties or on the basis of a trade-off of interest, you have the right to object to this processing.

[Read more about your right to protest](#)

### Data portability

If we process information about you on the basis of consent or an agreement, you may ask us to transfer your personal data directly to you, or to another data controller.

[Read more about your right to transfer information](#)

### Complaint to the Norwegian Data Protection Authority

We hope you will speak directly to us if you feel we are not complying with the rules of the Personal Data Act, so we can try to resolve the matter in a good way for you. You can also complain to the Norwegian Data Protection Authority, which will then process the case further. [Read about how to do it, here](#)

## HOW WE PROCESS YOUR PERSONAL DATA

When you apply to get employed by us, we must process a number of personal data about you, but still no more than what we believe is necessary to fulfil our purposes. We process personal data differently based on where you are in your employee journey.

*There may be different:*

- types of personal data
- purpose
- legal basis
- systems
- and times of storage and deletion

Below you can read more about the treatments we make when you are in contact with us about and/or applying for a position with us. The overall purpose of processing your personal data in a recruitment process is to answer any questions you have and to process your application.

### Third parties and data processors we use in the recruitment process

To manage the recruitment process effectively, we use various platforms to advertise and manage job applications, such as job seeker portals and staffing agencies. Depending on your position and where and how it is advertised, you may be asked to create a profile to submit your question and/or application. This is clearly reflected in each job advertisement.

As of 01.01.2021, we use the following third parties in our recruitment process:

- Finn.no ([Privacy Policy](#))
- LinkedIn ([Privacy Statement](#))
- Staffing agency Visindi

We may also process personal data about you in other systems and with other data processors, as described in the next section.

### **Before applying for a position**

If you haven't applied for a position with us yet, we may still be processing personal information about you, for example if you send us an email or message via contact form on the website to ask about a position you are curious about, or maybe you call us directly. You may be able to disclose your name, phone number, email address and more. We have established procedures for reviewing and deleting such personal data regularly.

For more information about how we process such inquiries, including which data processors we use for this, please refer to our General Privacy Policy.

If you create a profile with a third party we use, as described above, it is these who are the data controller for your personal data as long as you do not apply for a position with us. If, on the other hand, you submit an application to us through such a partner, we will be the data controller for the personal data associated with the application.

*Please read their respective privacy statements for information about how they process your personal data (including purpose, legal basis and retention period).*

### **When applying for a position**

If you want to apply for a position with us, we need to process your personal data in order to assess the application. The recruitment process involves us processing information you provide to us in this connection, which may be, depending on the type of position, personal data such as:

- Full name
- Address
- Phone number
- Email address
- Birthdate
- Application
- Resume
- Diplomas
- Testimonials
- Skill assessments (solving case studies, etc.)
- Social media profiles
- Personality tests
- Notes from interviews
- Presentations you've given or submitted
- Case assignments from interview process

We also often speak to references you provide and do your own surveys of testimonials you have sent us.

Your job application is managed in the job seeker portal such as LinkedIn, Finn.no, and/or at the staffing agency. General applications are deleted in the portal within 120 days. Application with status employee or interview deleted in the portal within 12 months.

The purpose of the processing is to manage your job application, and the legal basis is Article 6-1(b) GDPR; *to implement measures at the job seeker's request before an agreement is concluded.*

We may also look up information about you in open sources such as social media and public records, check out certificates you have submitted and speak to references you have provided. The purpose is to ensure that we hire the right candidate, and the legal basis is Article 6-1(f) of the GDPR, where the legitimate interest is to find the right candidate for the position, and where the privacy consideration in this particular situation weighs less than this interest.

You can also choose to keep your profile in the job seeker portal, at the staffing agency and/or with us, in case you wish to apply for another position in the future. In this case, the legal basis for this processing is Article 6-1(1) of the GDPR; *your consent*. Your personal data will be deleted if you withdraw your consent or if you do not actively renew it at our request within 12 months.

### **Treatment of special categories of personal data**

Special categories are personal data about racial or ethnic origin, political opinion, religion, philosophical conviction or union membership, genetic and biometric information, health information, information about sexual relationships or sexual orientation ([read more on the Data Protection Authority's website](#)).

When applying for a job with us, you do not need to provide special categories of personal data. You can still choose to do so, for example if you have a disability that requires facilitation in the workplace or in your employment.

The legal basis for the processing of special categories of personal data in this regard is Article 6-1(b) of the GDPR); *to implement measures at the job seeker's request before an agreement is concluded*, as well as Article 9-2 letter b); *treatment is necessary to fulfil our obligations in the field of employment law in accordance with the law.*

## SECURITY AND SHARING OF PERSONAL DATA

You should feel confident that we take your privacy seriously. We have carried out risk assessments and introduced technical and organizational security measures to protect your personal data. For more details on this, please refer to our General Privacy Policy.

We only share personal data that is essential and/or that we are required by law to share. We quality ensures all the data processors and suppliers we use, for example by entering into data processing agreements. Where we share personal data about you stored outside the EU/EEA, we also collect the necessary guarantees (e.g. EU standard contracts). Suppliers/partners must sign confidentiality and security procedures as needed.

## REPORTING VIOLATIONS

Desert Control asks that any violations are reported to Desert Control's CEO, or the Chairman, or the Board of Directors to whom contact information is found on the Company webpage.

## INQUIRIES AND UPDATES

All inquiries and questions should be addressed to Desert Control's CEO.

Desert Control's Board of Directors may update this GDPR and Data Privacy Policy from time to time.

The Board of Directors  
Desert Control AS  
Sandnes, Norway, 8. March 2021

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Knut Nesse  
Chairman

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Brage Wårheim Johansen  
Board member

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Arnfinn Matre  
Board member

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Geir Hjellvik  
Board member

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Marit Røed Ødegaard  
Board member

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Kristian P. Olesen  
Board member

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Ole Kristian Sivertsen  
Chief Executive Officer