

# Personnel Privacy Policy

## 1 Introduction

At Linkfire we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that Linkfire collects from or about you, and how we use and to whom we disclose that information.

## 2 Application

Linkfire is a company with operations both inside and outside of Denmark.

Linkfire has adopted a series of Privacy Policies in order to address the specific privacy concerns of certain groupings of individuals and specific issues relating to the use of our services. This Privacy Policy applies to the personal information of all individuals who seek to be, are, or were employed by Linkfire (collectively "personnel"), unless the personal information is collected, used or disclosed while using the Linkfire websites. This personal information is dealt with in the Linkfire "Privacy Portal".

If you are unsure of which Privacy Policy applies to you, please contact the office of our Data Privacy Officer for more information.

## 3 Organizations Covered by this Policy

The Linkfire Group ("Linkfire Group") includes the parent company, Linkfire ApS. and its affiliated entities, including companies in Europe and North America operating partnership known as "Linkfire".

All references in this Privacy Policy to "Linkfire", "we", "us", "our" and like terms should be interpreted accordingly.

Linkfire Aps is the data controller for the purposes of the personal data processed under this Policy.

## 4 Policy of Compliance

It is Linkfire's policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and / or an individual's right to privacy are different from one jurisdiction to another. This Privacy Policy was developed to guide the activities of Linkfire. In addition, specific privacy practices may be adopted to address the specific privacy requirements of particular jurisdictions.

This Privacy Policy has a limited scope and application and the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Policy applies to you, please contact the office of our Privacy Officer for more information.

## 5 What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications. Personal information does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual).

## 6 What Personal Information Do We Collect?

We collect and maintain different types of personal information in respect of those individuals who seek to be, are, or were employed by us, including the personal information contained in:

- resumes and/or applications;
- references and interview notes;
- photographs and video;
- letters of offer and acceptance of employment; employment contracts;
- mandatory policy acknowledgement sign-off sheets;
- payroll information; including but not limited to social insurance number, bank details, pay cheque deposit information, and pension payment information;
- wage and benefit information;
- forms relating to the application for, or in respect of changes to, health and welfare benefits; including, short and long term disability, medical and dental care; and
- beneficiary and emergency contact information.

In addition to the examples listed above, personal information also includes information such as name, home address, telephone, personal email address, date of birth, personnel identification number (such as SSN/CPR-number), and marital status, and any other information necessary to Linkfire's business purposes, which is voluntarily disclosed in the course of a person's application for and employment with Linkfire.

As a general rule, Linkfire collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).

From time to time, we may utilize the services of third parties (including other members of the Linkfire Group) in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

## 7 Why Do We Collect Personal Information?

The personal information collected is used and disclosed for our business purposes, including establishing, managing or terminating your employment relationship with Linkfire. Such uses include:

- determining eligibility for initial employment, including the verification of references and qualifications;
- administering pay and benefits in collaboration with local tax authorities;
- processing employee work-related claims (e.g. worker compensation, insurance claims, etc.)
- establishing training and/or development requirements;
- conducting performance reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- gathering evidence for disciplinary action, or termination;
- establishing a contact point in the event of an emergency (such as next of kin);
- complying with applicable labour or employment statutes; eg. collaboration with tax authorities or Immigration/VISA services
- compiling directories;
- ensuring the security of company-held information; and
- such other purposes as are reasonably required by Linkfire.

## 8 Monitoring

The work output of Linkfire's employees, whether in paper record, computer files, or in any other storage format belongs to us as per our general IP policy. This work output, and the tools used to generate it, are always subject to review and monitoring by Linkfire.

In the course of conducting our business, we may monitor employee activities and our premises and property. For example, some of our locations are equipped with surveillance cameras. These cameras are generally in high risk areas like office thresholds. Where in use, surveillance cameras are there for the protection of employees and third parties, and to protect against theft, vandalism and damage to Linkfire's goods and property. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority. Pursuant to our Information Security Policy, we have the capability to monitor all employees' computer and e-mail use.

This section is not meant to suggest that all employees will in fact be monitored or their actions subject to constant surveillance. We have no duty to monitor. It is meant to bring to your attention the fact that such monitoring may occur and may result in the collection of personal information from employees (e.g. through their use of our resources). When using Linkfire equipment or resources employees should not have any expectation of privacy with respect to their use of such equipment or resources.

## 9 How Do We Use Your Personal Information?

We may use your personal information:

- for the purposes described in this Privacy Policy; or
- for any additional purposes that we advise you of and where your consent is required by law we have obtained your consent in respect of the use or disclosure of your personal information.

We may use your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

## 10 When Do We Disclose Your Personal Information?

We may share your personal information with our employees, contractors, consultants and other parties (including other members of the Linkfire Group) who require such information to assist us with establishing, managing or terminating our employment relationship with you, including: parties that provide products or services to us or on our behalf and parties that collaborate with us in the provision of products or services to you. In some instances, such parties may also provide certain information technology and data processing services to us so that we may operate our business. We may share personal information with such parties both in and outside of your home jurisdiction, and as result, your personal information may be collected, used, processed, stored or disclosed in Europe and in the United States of America, and in some cases, other countries. Personal information is only transferred by us to another country, including within the Linkfire Group, if this is required or permitted under the applicable privacy legislation, in particular only in as far as a reasonable level of data protection is assured in the recipient country.

When we share personal information with such parties we typically require that they only use or disclose such personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy.

In addition, personal information may be disclosed or transferred to another party (including to another member of the Linkfire Group outside of your home jurisdiction) in the event of a change in ownership of, or a grant of a security interest in, all or a part of Linkfire through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Further, your personal information may be shared or disclosed:

- as permitted or required by applicable law or regulatory requirements. In such a case, we will endeavor to not disclose more personal information than is required under the circumstances;
- to comply with valid legal processes such as complying with tax processes, cooperating with governmental institutions
- as part of Linkfire's regular reporting activities to other members of the Linkfire Group (including outside of your home jurisdiction);
- to protect the rights and property of Linkfire;

- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- with your consent where such consent is required by law.
- On our homepage, e.g. image, full name and work email address

In congruence with Article 15c, you have the right to request detailed information regarding who we shared your data with by contacting the office of our Data Privacy Officer.

## 11 Notification and Consent

Privacy laws do not generally require Linkfire to obtain your consent for the collection, use or disclosure of personal information for the purpose of establishing, managing or terminating your employment relationship. In addition, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

To the extent that your consent is required, we will assume, unless you advise us otherwise, that you have consented to Linkfire collecting, using and disclosing your personal information for the purposes stated above (including any other purposes stated or reasonably implied at the time such personal information was provided to us).

Where your consent was required for our collection, use or disclosure of your personal information, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

## 12 How is Your Personal Information Protected?

Linkfire endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect your personal information from loss and unauthorized access, copying, use, modification or disclosure.

## 13 How Long is Your Personal Information Retained?

Except as otherwise permitted or required by applicable law or regulatory requirements, Linkfire endeavors to retain your personal information only for as long as it believes is necessary to fulfill the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

- **Maternity and Paternity:** 6 years from the end of employment.
- **Financial records:** NATIONAL LEGAL REQUIREMENTS (tax, salary/pay, working time)
- **Application and Recruitment Records:** 24 months.
- **All Personnel Files and Records:** 6 years from the end of employment.
- **Redundancy Records:** 6 years from the end of employment.
- **Sickness Absence Records:** 6 years from the end of employment.

## 14 Updating Your Personal Information

It is important that the information contained in our records is both legally accurate and current. If your personal information happens to change during the course of your employment, you are legally obliged to keep us informed of such changes. This is in order for us to comply with legal requirements for your employment as well as to be able to cooperate with national authorities as required by local law, e.g. tax authorities.

## 15 Access to Your Personal Information

You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information, please contact the office of our Privacy Officer using the contact information set out below. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to

search for and provide you with the personal information that we hold about you. If you require assistance in preparing your request, please contact the office of our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions.

## 16 Inquiries or Concerns?

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact the office of our Privacy Officer by email. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are unsatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner applicable for your jurisdiction.

## 17 Privacy Officer

We have appointed a Privacy Officer to oversee compliance with this Privacy Policy. The contact information for our Privacy Officer is as follows:

Tobias Demuth - DPO  
privacy@linkfire.com

## 18 Revisions to this Privacy Policy

Linkfire may from time to time make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will communicate any revised version of this Privacy Policy. Any changes to this Privacy Policy will be effective from the time they are communicated, provided that any change that relates to why we collect, use or disclose your personal information will not apply to you, where your consent is required to such collection, use or disclosure, until we have obtained your consent to such change. This Privacy Policy was last reviewed August 1, 2018.

## 19 Interpretation of this Privacy Policy

Any interpretation associated with this Privacy Policy will be made by the Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'. This Privacy Policy does not create or confer upon any individual any rights, or impose upon Linkfire any rights or obligations outside of, or in addition to, any rights or obligations imposed by the privacy laws applicable to such individual's personal information. Should there be, in a specific case, any inconsistency between this Privacy Policy and such privacy laws, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

Linkfire Aps is the data controller for the purposes of the personal data processed under this Policy.