Introduction

At IFS, your trust is important to us. Our commitment to trust is built into every hire, every employee process and every solution we deliver to our customers.

As a market-leading, customer-led company, we strive to stay compliant with data and security regulations, as well as maintain high standards that help protect our company and our customers who rely upon us.

At IFS we are dedicated to being compliant with laws and regulations. Business integrity as an integrated part of our core values. Safeguarding our customers trust and privacy is of the outmost importance to us.

This Recruitment Privacy Policy describes how Industrial and Financial Systems, IFS AB (IFS) and its affiliates handle and process your personal data in connection with recruitment processes. The local IFS entity of the country in which you apply for a job, is the controller for processing your personal information as described in this Privacy Policy. A list of IFS entities is available here at ifs.com/legal

Why does IFS collect your Personal Data

As part of our talent acquisition process, IFS collects and processes personal data to assist with our different phases of a recruitment process. We process data from potential job applicants in our talent pool to communicate opportunities at IFS and news updates. We process data from job applicants to allow IFS to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We also need to process your personal data prior to entering into a contract with you in accordance with our legal obligations. For example, it is required to check a successful applicant's eligibility to work in the country where the job is based before employment starts.

Legal basis for IFS Processing your Personal Data

When you are applying for a job with us, IFS in its role as data controller, follows the legal basis for processing your personal data to the extent that is necessary for the performance of a contract. We may process your personal data in our talent pool based on legitimate interest, or in some instance based on your consent. There may also be other occasions where IFS needs to process data from job applicants on the basis of legitimate interest, for example if needing to respond to a legal process or claim.

IFS makes sure that these interests are in balance with the rights and freedoms of job applicants, employees or workers and has conducted a balance of interest test to ensure this is the case in the way we process your data.

IFS will only process health information if it needs to make reasonable adjustments for a candidate. This is to carry out its obligations and exercise specific rights in relation to employment.

Where IFS processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes as required by applicable equal opportunities legislation (legal obligation).

For some roles in certain jurisdictions, IFS is obliged to seek information about criminal convictions and offences. Where IFS seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment/to comply with a regulatory requirement to establish whether or not an individual has committed an unlawful act or been involved in dishonesty or other improper conduct/reasons of substantial public interest.

As part of using this service you are asked to review and acknowledge that you understand how we will process your data as documented in this privacy policy. We hold a record of how your data was collected, on which basis we are processing the data in your candidate profile as is necessary in accordance with data protection regulations. Any questions regarding this privacy policy should be sent to privacy@ifs.com

What Information Does IFS Collect?

IFS collect the following information about you in connection with the recruitment process:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements; (where permissible by local jurisdiction).
- information about health concerns or disabilities, for which IFS may be required to make reasonable adjustments;
- information about your entitlement to work in the Country for where the role is based.
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

IFS collect this information through application forms, CVs or resumes, passport or other identity documents, or directly through interviews or other forms of assessment including online PPA questionnaire or tests.

IFS will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. IFS will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Who Has Access To Data?

Your information will be shared internally within IFS for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

IFS will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. IFS will then share your data with former employers to

obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks if these are required for the role.

Your information may also be disclosed to our service providers who assist us with running our business and who process your information for us on our behalf, including recruitment and IT service providers (for example background checking services).

Your data may be transferred outside the European Economic Area (EEA) in the cases where either the position is based outside of the EEA or where IFS employees involved in the hiring process reside outside of the EEA. Where this is necessary, data is transferred outside the EEA in accordance with EU model clauses to ensure its safeguarding.

Automated Decision Making

Whilst certain elements of the recruitment system help with guiding a match to the role's requirements, decisions on selection for interview and future employment are made by IFS staff.

How Does IFS Protect Your Data?

IFS takes the security of your data seriously. We have technical and organisational measures and controls in place to help prevent your data from being lost, accidentally destroyed, misused or disclosed, nor accessed except by our employees in the proper performance of their duties.

IFS utilises the services of SmartRecruiters as part of our recruitment process and who act as a data processor on behalf of IFS. They provide the platform within which the recruitment process is executed and whose processing responsibility is limited to ensuring the continued availability of the service only. IFS has reviewed their technical and organisational controls to ensure adequacy in accordance with their processing of your personal data as part of the recruitment process. These controls cover the integrity, confidentiality and availability of your personal data, including use of data encryption in transit and at rest, least privileged access rules and real-time data redundancy

and replication and are certified in accordance with appropriate certifications, as detailed within IFS Trust Center.

How Long Does IFS Keep Your Data?

IFS retains candidates' data as long as it is necessary for the purposes it was collected for, in accordance with applicable laws in the country where the specific position is based. IFS retains data in the talent pool in accordance with applicable legislation. If you wish to know how long we store your data based on a particular country's applicable legislation please email privacy@ifs.com

Your Rights

As a data subject, you have the following rights in relation to IFS' processing of personal data:

- Right to withdraw your consent;
- Right to access your personal data and obtain a copy of it;
- Right to rectification;
- Right to erasure;
- Right to object against IFS' processing of your personal data;
- Right to restriction of processing;
- Right to data portability; and
- Right to lodge a complaint at the supervisory authority.

If you would like to exercise any of these rights, please contact us at privacy@ifs.com.

What If You Do Not Provide Personal Data?

You are under no statutory or contractual obligation to provide data to IFS during the recruitment process. However, if you do not provide the information, IFS may not be able to process your

application properly or at all. If your application is successful, it will be a condition of any offer of employment that you provide evidence of your right to work in the Country within which the position is based and provide satisfactory references.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Recruitment Privacy Policy updates and questions

IFS may update this Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Policy.

Industrial and Financial Systems, IFS Aktiebolag (Swedish company reg. no 556122-0996) is the data controller for the purposes of this Policy.

If you have any questions or concerns about the Recruitment Privacy Policy, please contact IFS Global Data Privacy Officer at privacy@ifs.com

How to contact us

If you have questions regarding this privacy statement or if you wish to exercise your rights of access, rectification, erasure, restriction of processing, data portability, objection to automated decision-making please contact us via:

<u>privacy@ifs.com</u> or Privacy, IFS World Operations AB, Teknikringen 5, 581 15 Linköping, Sweden. In your letter/email please state your full name and contact information.

You may also reach out to our Data Protection Officer (DPO) at <u>ifsdpo@synchlaw.se</u>.

Revised and posted/updated as of 1st September 2022.