

Privacy Notice for Candidate

1. **The controllers** of your personal data are PRA Group Europe Portfolio AS, Oslo, Zug branch, Switzerland and PRA Group Europe Holding S.à.r.l., Luxembourg, Zug Branch, Switzerland (hereinafter “we” “our” and “us”).
2. **Contact point** for matters concerning data protection:
 - a) e-mail: hr-dataprotection@pragroup.eu
 - b) post: Bundesstrasse 5, 6300 Zug, Switzerland
3. **Purpose of processing personal data and legal basis:**

Application: activities carried out in the course of receiving and assessing applications, including reviewing general applications or applications for specific jobs which may be received directly from you or via a recruitment agency. This may involve the processing of your CV, name, address, employment history, academic and professional qualifications, age and nationality.

Article 31(1) of the FADP - we process your application on the basis of a consent provided to us when applying for a position;

Assessment: activities carried out in the course of the recruitment process to ensure your suitability for roles at PRA Group which may involve the processing of your CV, assessment centre interviews (such as a role play, group exercise or presentation), interview (face to face, telephone or video), technical assessments or other appropriate tests for the role, shortlisting the candidates;

Article 31(1) of the FADP - on the basis of our legitimate interest as your potential employer;

Defend our interest: after the end of the recruitment process, we will process your data in order to defend against claims that may result from the recruitment process.

Article 31(1) of the FADP on the basis of our legitimate interest as your potential employer;

Future recruitment: If you agree to the storage of your data after the recruitment process in which you participated, we may retain your application for future recruitments that we may carry out.

Article 31(1) in connection with Article 6(6) of the FADP on the basis of your consent.

If you are **the successful candidate** (we have offered you to conclude an employment contract) additionally we will process your data in purposes set out below.

Pre-contractual process: we will process your personal data prior to entering an employment contract in order to prepare Your contract and the measures necessary for you to start performing your employment duties

Article 31(1) and Article 31(2)(a) of the FADP on the basis of pre-contractual processing, legal obligation and our legitimate interest, as your future employer

Pre-employment screening (PES): pre-employment screening activities carried out in-house or third party provider for the purposes of identity verification, education qualifications checks, employment checks, credit history and criminal records check. In some cases we will seek information from third parties, such as references from former employers.

Article 31(1) of the FADP on the basis of our legitimate interest, as your future employer and your consent where required

Verification of sanctions lists (including OFAC). We check whether your data is on sanctions lists, including lists maintained by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC). If your data appears on the OFAC sanction lists, we will share this information with PRA Group, Inc., which will mean the transfer of your data to the USA (for more information about data transfers, read section 5 of data recipients).

Article 31(1) of the FADP on the basis of our legitimate interest, which is to implement internal group policies

4. Source of data

If you did not send us your application directly, we have obtained your data included in your CV, job application and other data you may have provided from the recruitment agency or from the person that have recommended you in the referral program. We may also obtain your personal data during the pre-employment screening from our service provider.

5. Data recipients and data transfer

- a) For the abovementioned purpose(s) we can disclose your data to the following recipients: (i) to any of our related affiliates within the PRA Group of companies; (ii) recruitment and other third party agencies; (iii) vendors that provide us with services, such as IT service providers or HR system provider;

- b) Your personal data may be **transferred to a recipient in a third country**¹ for example, in connection with the use of a foreign IT subcontractor or in connection with the provision of intra-group services. Additionally, if your data appears on the OFAC sanction lists, we will share this information with PRA Group, Inc., which will mean the transfer of your data to the USA;
- c) If we transfer Your personal data to countries without an adequacy decision from the Swiss Federal Council, we ensure an adequate level of protection by entering into the standard contractual clauses approved by the Swiss Federal Data Protection and Information Commissioner ("FDPIC") or relying on another legally recognised safeguard. You may request a copy of applicable safeguards via the contact details above. In any case, data transfers outside Switzerland will be carried out in accordance with the rules set out in Article 16 and 17 of the FADP.

6. Data Storage

Your personal data is stored for the duration of the recruitment activity and after its completion:

- a) for unsuccessful candidates personal data will be kept for a period necessary to defend our interests but for no longer than 12 months;
- b) if the candidate is successful, the documents will be transferred to the your personal file and the applicable legal timeframes will be applicable.

7. Your Rights

We also would like to inform you that, subject to further legal obligations, you have the following **rights**:

- a) Right to access to your personal data - Article 25 of the FADP;
- b) Right to rectify your personal data - Article 32(1) of the FADP;
- c) Right to erasure (right to be forgotten) - Article 32(2)(c) of the FADP;
- d) Right to data portability - Article 28 of the FADP;
- e) Right to object to processing - Article 30(2)(b) of the FADP;
- f) Right to not to be subject to a decision based solely on automated processing including profiling – Article 21 of the FADP;
- g) Right to lodge a complaint to a competent supervisory authority, if you believe that the processing of your personal data is unlawful. The name of the competent supervisory authority is the following: *the Federal Data Protection and Information Commission*

8. Right to withdraw a consent

Where the processing of your personal data is based on consent given to us for one or more specific purposes, you may withdraw your consent at any time. We would like to inform you that withdrawal of the consent does not affect the lawfulness of the processing before its withdrawal. If you wish to withdraw your consent, please contact us. You can find our contact details in point 2.

9. Automated decision-making

We are not making automated decision based on your personal data.

10. Requirement to provide data

Providing data in the recruitment process is voluntary, but it is necessary to participate in the recruitment process. Failure to provide required personal data may mean that we will not be able to consider your application. Providing data for the purpose of concluding a contract with the selected candidate is a necessary condition for conclusion of an employment contract. Failure to provide data will prevent the conclusion of the contract.

¹ A third country is a country located outside of Switzerland and the European Economic Area ("EEA"). The EEA includes the Member States of the European Union, Iceland, Liechtenstein and Norway.