



# Roschier Recruitment Privacy Policy

Updated 14 October 2025

## **1. What is the purpose of this policy?**

We, at Roschier respect the privacy of the individuals who apply for a position at Roschier (hereinafter "You" or "the Candidate") and We comply with applicable data protection legislation when We process personal data during the recruitment process.

This Recruitment Privacy Policy applies to both Roschier Advokatbyrå AB and Roschier Attorneys Ltd (jointly referred to as "Roschier" or "We" unless otherwise specified) and informs You about how Roschier collects and processes Your Personal Data during the recruitment process, and what Your data protection rights are as You apply for a position at Roschier.

If You have any questions about how Your personal data is processed or if You would like to exercise Your rights as described in this Privacy Policy, please contact our privacy team at [privacy@roschier.com](mailto:privacy@roschier.com).

## **2. What is "personal data" and "processing of personal data"?**

The term "personal data" refers to any information which is directly or indirectly connected to an individual. "Processing" of personal data refers to any activities taken with regard to personal data, for example collection, recording, organization, use, transfer, disclosure, storage, combination, deletion, erasure and other measures.

## **3. What kind of personal data will Roschier process?**

We will process personal data regarding our Candidates as set out in the "Data Processing Matrix" available below. We will only process personal data for the purposes described in the Data Processing Matrix.

We collect personal data primarily directly from the Candidates themselves during the recruitment process and from the appointed recruitment team which has been in contact with You during the recruitment process. We may also receive personal data about You from individuals who You have designated as Your references and from external service providers, for example in the context of tests and assessments carried out by using third-party providers.

If You are offered and You accept an employment offer from Us, we will transfer any relevant personal data about You to Roschier's systems for processing of employee personal data and Roschier's Employee Privacy Policy will apply.

## **4. How is my personal data processed?**

Roschier processes personal data for the purposes described in the Data Processing Matrix, available below. We have taken appropriate technical and organizational measures for the protection of Your personal data to ensure that only authorized people have access to personal data. We use technical security systems, such as firewalls, encryption technologies, passwords and anti-virus programs to prevent and avoid unauthorized use of personal data.

## **5. To what categories of third parties may my personal data be disclosed?**

### **Companies engaged by Roschier**

To enable us to administer the recruitment process and fulfil the purposes set out in the Data Processing Matrix, we may share Your personal data with certain third-party suppliers. These are companies which provide us with systems which are necessary for carrying out the recruitment process and include service providers for recruitment systems and online assessments. When third-party providers process personal data on our behalf and according to our instructions, they are acting as data processors and they may not use Your personal data for their own purposes.

**For applicants in Sweden only:** We conduct background checks at the final stages of recruitment processes and order such background checks from a third-party provider, 2Secure. We will share Your name, email address, personal number and CV with 2Secure. 2Secure will then carry out a background check independently, acting as a data controller, and compiles a report about their findings which will be delivered to us. 2Secure will provide information about their processing of Your personal data before initiating the background check.

### **Authorities**

Roschier may need to provide personal data to relevant authorities in accordance with mandatory law and in order to fulfill legal mandatory obligations in both jurisdictions.

## **6. To what countries will my personal data be transferred?**

We only process Your personal data within the EU and EEA.

## **7. Who has access to my personal data?**

Personal data will only be available to authorized employees at Roschier that are involved in the recruitment process.

## **8. For how long will my personal data be processed?**

We will not store or process personal data for a period longer than necessary to fulfill the purposes described in the Data Processing Matrix, available below. Accordingly, when the purpose has been fulfilled for a specific type of personal data, we will stop using the personal data for that purpose and, if the same data is not relevant for any other purpose, delete the relevant personal data as soon as reasonably possible.

## 10. What are my rights regarding my personal data?

### Right to access and rectification

You have the right to request access to Your personal data. This includes the right to be informed whether personal data about You is being processed, what personal data is being processed, and the purpose of the processing.

You also have the right to rectify or add personal data if the personal data is inaccurate or incomplete. As soon as We become aware of any inaccurate personal data about You being processed, we will always rectify such personal data without undue delay and notify You accordingly.

### Right to erasure

You may also request that Your personal data be erased, e.g. if the personal data is no longer necessary with regard to the purposes for which it was collected, if the processing is based on Your consent and You withdraw Your consent for a specific processing and there is no other legal ground for processing Your personal data, if You object to the processing of personal data where We do not have an overriding legitimate interest, the processing is unlawful, or the personal data has to be erased to enable us to comply with a legal requirement. If You have any questions about Your right to erasure, please contact us (please see section 1 for contact details). Please note that We may reject Your request if the processing is permitted or required according to law or any other relevant legal ground.

### Right to object

You are also entitled to object to our use of Your personal data that We base on our legitimate interest. If You object, we will no longer process your personal data unless We can show that We have compelling legitimate grounds for the processing that overrides Your interests or rights and freedoms, or if We need it to establish, exercise or defend legal claims.

### Right to restriction

You can request us to restrict the processing of Your personal data in the following situations:

- if the processing is no longer necessary for the purposes it was collected or otherwise processed,
- if You believe the personal data may not be correct,
- if You believe that the processing is unlawful, and/or
- if You have objected to processing based on our legitimate interest.

### Right to data portability

If you request access to personal data about You that You have provided and if the personal data is being processed automatically and/or in accordance with a contract between You and Roschier, You may request that the data is provided in a structured, commonly used and machine-readable format and You may also request that the personal data is transmitted to another controller, if this is technically feasible.

**Right to submit a complaint**

If You have any complaints about how We process Your personal data, or would like further information, please contact our privacy team at [privacy@roschier.com](mailto:privacy@roschier.com).

If You wish to file a complaint with a national supervisory authority regarding our processing of Your personal data, you may do so by contacting Your local data protection authority. The relevant authority in Sweden is Integritetsskyddsmyndigheten ([www.imy.se](http://www.imy.se)) and, in Finland, the Data Protection Ombudsman ([www.tietosuoja.fi](http://www.tietosuoja.fi)).

**14. Updates to the policy or processed data**

In order to ensure that We comply with data protection law, this Privacy Policy may be changed at any time. We will inform You of any changes made.

This Privacy Policy was last updated on 14 October 2025.

## Data Processing Matrix

Purpose	Personal data type	Legal ground	Retention time or criteria
<b>Managing the recruitment process</b>	<ul style="list-style-type: none"> <li>• Identification data (e.g. name, personal identity number)</li> <li>• Contact information (e.g. name, address, telephone number, email address)</li> <li>• Application materials (e.g. CV, job qualifications, educational background, former employers, career history, performance information)</li> <li>• Video material recorded through Jobylon during the recruitment process</li> <li>• Data in Your communication with us (such as the content of e-mails)</li> <li>• Other information necessary for the recruitment that You provide us with during the recruitment process</li> </ul>	<p>Legitimate interest – the processing is necessary to fulfil our legitimate interest in managing the recruitment process.</p> <p>Contact us if You would like to know more about how We have balanced Your interests against ours.</p>	During the recruitment process.
<b>Saving Your application for future recruitment processes</b>	<ul style="list-style-type: none"> <li>• Identification data (e.g. name, personal identity number)</li> <li>• Contact information (e.g. name, address, telephone number, email address)</li> <li>• Application materials (e.g. CV, job qualifications, educational background, former employers, career history, performance information)</li> <li>• Data in Your communication with us (such as the content of e-mails)</li> <li>• Other information necessary for the recruitment that You provide us with during the recruitment process</li> </ul>	<p>Consent – You may consent to Roschier being able to take Your application into consideration in future recruitments for similar positions.</p> <p>You can withdraw Your consent at any time by contacting us at <a href="mailto:privacy@roschier.com">privacy@roschier.com</a>.</p>	If You have agreed to have Your information saved by us, your application will be stored for a maximum of 2 years or until You request us to remove Your application.
<b>Taking references</b>	<ul style="list-style-type: none"> <li>• Identification data (name)</li> </ul>	To the extent we collect information from a third party (reference), the	During the recruitment process.

	<ul style="list-style-type: none"> <li>• Application materials (e.g. CV, job qualifications, educational background, former employers, career history, performance information)</li> <li>• Information received from the individual which you have designated as your reference</li> <li>• Other information necessary for the recruitment that You provide us with during the recruitment process</li> </ul>	<p>processing is based on your consent.</p> <p>You can withdraw Your consent at any time by contacting us at <a href="mailto:privacy@roschier.com">privacy@roschier.com</a>.</p>	
<b>Carrying out controls and tests</b>	<ul style="list-style-type: none"> <li>• Test data (e.g. test results, time of the test and type of test)</li> </ul>	<p>Consent to the extent required by local laws. Otherwise, legitimate interest – the processing is necessary to fulfil our legitimate interest in carrying out controls, personality and ability tests.</p> <p>Contact us if You would like to know more about how We have balanced Your interests against ours.</p>	During the recruitment process.
<b>For Candidates in Sweden only: Ordering and reviewing a background check report from 2Secure</b>	<ul style="list-style-type: none"> <li>• Identification data (e.g. name, personal identity number)</li> <li>• Application materials (e.g. CV, job qualifications, educational background, former employers, career history)</li> <li>• Information included in 2Secure's final report (The information which is included in the report is determined by 2Secure. Typically, the report includes 2Secures findings relating to economic details, education &amp; CV verification as well as media &amp; social media exposure.)</li> </ul>	<p>Legitimate interest – the processing is necessary to fulfil our legitimate interest in ensuring the Candidate's suitability and reliability to handle sensitive information and assignments, to protect Roschier's reputation and to uphold high professional and ethical standards.</p> <p>Contact us if You would like to know more about how We have balanced Your interests against ours.</p>	During the recruitment process.
<b>Managing and responding to potential legal claims</b>	<ul style="list-style-type: none"> <li>• Categories of personal data described in the Data Processing Matrix</li> </ul>	Legitimate interest – the processing is necessary to fulfil our legitimate	24 months after the recruitment process.

<b>related to our recruitment process</b>	which are necessary in order to manage and respond to potential legal claims	interest in managing and responding to legal claims. To the extent the data includes special categories of data, our processing ground is defending legal claims.  Contact us if You would like to know more about how We have balanced Your interests against ours.	
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