

## **Privacy Policy for Applicants to SAMSØE & SAMSØE and ENVII**

### **1. IN GENERAL**

We are committed to protecting the data privacy and security of all individuals who submit an application to Samsøe & Samsøe and Envii, whether in response to a specific job posting, via an unsolicited application, or through external recruitment channels. This Privacy Policy describes how Samsøe & Samsøe and ENVII (hereinafter "the Group", "we", "us" or "our") collect and process your information.

The data controller responsible for your personal information is:

P & P Holding  
CVR 32325807  
Ryesgade 19C  
2200 København N  
Denmark

If you have any questions regarding our processing of your personal data, please contact [HR@samsøe.com](mailto:HR@samsøe.com).

### **2. WHAT PERSONAL DATA DO WE COLLECT DURING THE APPLICATION AND HIRING PROCESS**

The Group collects and processes personal data that is relevant and necessary for the management of the application and employment process. The categories of data we may process include:

- Name
- Address
- Phone number
- Email address
- CPR number (where required for employment)
- Educational background
- CV
- Application materials
- In connection with cooperation with international offices, tax and bank account information may be processed when necessary for payroll administration
- Photograph (where applicable)
- Certificates, relevant courses, and any other supplementary documents submitted in connection with the application (where applicable).
- References (Note: references will only be collected with the applicant's prior consent and agreement)

The Group processes this data to ensure the proper and efficient conduct of recruitment and employment procedures, as well as to comply with legal obligations. All processing is carried out on a lawful basis, including consent, fulfillment of contractual or legal obligations, or legitimate interest where applicable.

### **3. PURPOSE OF PERSONAL DATA PROCESSING**

The Group processes personal data of applicants for the purpose of carrying out the recruitment and hiring processes in an efficient, lawful and transparent manner. The processing includes the following purposes:

- To provide a qualified basis for our decision regarding potential employment.
- To document and manage the recruitment and employment process.
- To plan and conduct interviews and assessments.
- To store the application for future positions (with consent).

### **4. LEGAL BASIS FOR PROCESSING THE APPLICANT'S PERSONAL DATA**

The Group has a legitimate interest in processing the information you provide in connection with the application and employment process. The purpose is to assess whether to offer you employment and to document the considerations underlying decisions made during the process, in accordance with Article 6(1)(f) of the General Data Protection Regulation (hereafter GDPR). This applies, among other things, to information regarding identity, education, work experience, and application materials.

If you provide consent for the Group to obtain information from previous employers, references, or other third parties, the processing of such information will also be based on your consent, in accordance with Article 6(1)(a) of the GDPR.

If you wish to withdraw any consent given in connection with the recruitment process, you may contact [HR@samsoe.com](mailto:HR@samsoe.com). Please note that withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal. Any withdrawal will only take effect from the time we receive your notification.

### **5. DISCLOSURE OF PERSONAL DATA**

Generally, the Group does not disclose applicant data to third parties outside the company.

However, personal data may be shared with external partners, including recruitment agencies or IT providers, who process the data on behalf of the Group solely to support the recruitment process. All third-party processors are required to handle the information confidentially and in accordance with applicable data protection legislation.

In situations where the Group shares personal data with external IT service providers, we act as the data controller, and the providers assume the role of data processors. Binding agreements have been concluded with the providers, specifying that personal data may only be processed in accordance with the instructions issued by the Group.

Where processing of personal data involves foreign offices, we may process tax and account information via the above systems, as well as payroll information, where applicable, when necessary for payroll administration and compliance with applicable laws.

**Purpose:** To carry out application and employment processes and to manage payroll processing.

## **6. STORAGE AND DELETION OF APPLICANT DATA**

The Group retains the personal data you provide in connection with the application and employment process only for as long as necessary to fulfill the purposes of processing. This includes assessing your suitability, documenting the decision-making process, and complying with legal obligations. Once the data is no longer required for these purposes, it will be deleted or anonymized in a way that makes it impossible to identify you.

As a general rule, information about applicants who are not offered employment is retained for up to six (6) months after the completion of the application process, unless you have given consent for longer retention, for example, in our candidate pool.

If you are employed by the Group, your personal data will be retained for the duration of your employment and for a period of up to five (5) years from the end of the financial year in which your employment ends, in accordance with statutory limitation periods and the retention requirements under Chapter 5 of the Danish Bookkeeping Act (bogføringslovens kapitel 5).

If you wish to have your personal data deleted before the end of the specified retention period, you may contact [HR@samsoe.com](mailto:HR@samsoe.com). In such cases, we will delete your data unless there is a legal requirement or other legitimate reason to continue retention.

## **7. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA**

As a data subject, you have certain rights under the GDPR. To ensure transparency regarding the processing of your data, the Group, as the data controller, informs you of your rights. If you wish to exercise any of your rights, please contact us at [HR@samsoe.com](mailto:HR@samsoe.com). Your rights include the following:

### **7.1 RIGHT TO ACCESS**

You have the right to access the personal data collected about you. We may refuse requests that are manifestly repetitive, require disproportionate technical effort, or affect the rights of another person-

### **7.2 RIGHT TO RECTIFICATION**

You have the right to have any inaccurate or incomplete personal data about you corrected. Upon request, we will update, amend, or delete your personal data, except for data that must still be processed due to a legal obligation or our continuing legitimate interest.

### **7.3 RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)**

In certain circumstances, you have the right to request the deletion of your data before the time we would normally delete it. To the extent that continued retention of your data is necessary, e.g., to comply with legal obligations or to establish, exercise, or defend legal claims, we are not required to delete your personal data.

### **7.4 RIGHT TO RESTRICT PROCESSING**

In certain situations, you have the right to restrict the processing of your personal data to storage only, e.g., if you have contested the accuracy of the data and we are verifying its correctness, or if the data is no longer necessary for processing but is required by you to establish, exercise, or defend legal claims.

#### 7.5 RIGHT TO OBJECT

In certain situations, you have the right to object to our processing of your personal data, and always if the processing is for direct marketing purposes. Upon request, we will assess whether our legitimate interest overrides your interests, rights, and freedoms, or whether your personal data is necessary to establish, exercise, or defend legal claims.

#### 7.6 RIGHT TO DATA PORTABILITY

In certain situations, you have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to have such data transferred from one data controller to another.

#### 7.7 RIGHT TO WITHDRAW CONSENT

You have the right to withdraw any consent you have given us for a specific processing of personal data at any time.

#### 7.8 RIGHT TO LODGE A COMPLAINT

You may lodge a complaint with the Danish Data Protection Agency (Datatilsynet) at any time regarding our processing of personal data. Further information about your rights as a data subject is also available on the [Datatilsynet](#) website.

### 8. UPDATES TO THIS POLICY

We regularly review our Privacy Policy to ensure that it remains up to date, valid, and in compliance with applicable laws and principles of personal data processing.

Any new versions of the applicant Privacy Policy will be published on our website.

This Privacy Policy is effective as of 26. May 2026.