

## **GDPR. General Data Protection Regulation. European personal data regulation. Data Protection Act.**

The company Albæk Document accordingly how and why we treat all personal data – both the ordinary personal data and the sensitive personal information.

All Data collection have a relevant purpose and is based on a factual basis. Every time We choose to collect data about a candidate, we consider the following:

1. Is this data relevant or irrelevant – from a factual point of view?
2. Can I document how I collected this data, for example with a consent?
3. Have I informed the candidate where and how I store his data – and did I know what the candidate should do to be deleted again, or gain insight into what I have?

Note: The Data Protection Supervisory Authority concluded on 30 September May 2018 that you may receive applications by email as long as they do not contain sensitive or confidential material. However, this does not change that we still have to keep track of how to store data, including applications.

### **The difference between ordinary personal data and sensitive personal data**

When we relate to GDPR, it is important to distinguish between two groups of personal data, as there are particularly stringent requirements for handling of Group 2 – the personal data. We Must, for example, Not process Sensitive personal Information, unless there is explicit consent of the person whose information you are processing.

Personal data can be divided into two categories – Common line Personal Information and Sensitive personal Information.

### **General personal Data (no consent is required)**

- Photo
- Name
- Email
- Address
- Passports, driving licences, etc.
- Application, CV, date and position of employment, working area and work phone.
- Information on economic, tax, debt or significant social problems
- Sick days
- Conditions of Service
- Family relationships
- Home or car
- Offence (is separately regulated in the Data Protection Act but is considered to be normal. Personal data)

- Sensitive personal Information (Not stored)
- Race or ethnicity
- Political, religious or philosophical beliefs
- Health or sexual relations/orientation
- Genetic and biometric data
- Membership of the trade union
- Social Security Number

You can read more about personal data on the website of the Data Protection Authority.

### **Two processes we use to a GDPRCompliant:**

#### 1. Storing digitally and avoiding Printed material

If You, as Candidate/Coachee, want to be deleted again, we can find every Data Digital. We avoid to print normal Personal data, such as CVS's and Applications and personal profiles.

#### 2. Delete Data after 6 Months from the end of the course

Our TEST systems have some automatic "delete rules" or "reminders" built into their system so that data on the different candidates is automatically deleted within 6 months. after completion. For example, the results of the candidates /Coachees Personality tests or simple email correspondence.

### **We have set up the following delete rules:**

- All mails are deleted after 6 months
- All results of the personal tests are deleted after 6 Months in the person testing system that generates them – and they are deleted after 6 months in our human resources system.
- All Documents forwarded – including CV's and applications – are automatically deleted when the proces is completed. CVS and applications are only saved if we have received a new consent statement from the candidate/fokuspersonen.