

Global Recruitment Privacy Notice

Alleima Group

Last updated: June 2026.

Introduction

Global scope

Alleima's data protection framework is based on the principles of Regulation (EU) 2016/679 (the "**EU GDPR**") and the UK General Data Protection Regulation, as retained EU law under Section 3 of the European Union (Withdrawal) Act 2018 (the "**UK GDPR**") (together, the "**GDPR**"). These principles guide our global approach to the protection of personal data.

The rights described in this privacy notice reflect the requirements of applicable data protection laws and apply to the extent such laws govern the relevant processing activity. Your rights under this privacy notice may vary based on your location, the Alleima entity involved, and how your personal data is processed.

Where local data protection laws impose additional or differing requirements, such requirements may be addressed through local privacy notices, supplemental disclosures, or specific contractual arrangements.

Who is covered by this information

This privacy notice covers our use of personal data in connection with our recruitment activities at Alleima. It applies to candidates who have applied for a position at Alleima or who have otherwise been in contact with us in a recruitment context, including individuals who have created a candidate account. It also applies to referees provided by candidates.

Who is responsible for the processing of your personal data

There are normally several companies involved in different stages of the recruitment process, such as the Alleima company that is recruiting for the position, the Alleima company employing the recruiting team and/or the hiring manager, and any other Alleima companies or third parties assisting with recruitment.

Depending on the activity, these companies may either be jointly responsible (joint controllers) or independently responsible (separate controllers) the processing of your personal data. For more details, see our [detailed information on our use of personal data](#)

Alleima has entered into the Alleima Intra-Group Data Transfer Agreement (AIGDTA) that sets out the roles and responsibilities of each Alleima entity when processing your personal data as joint controllers. You have the right to obtain the essence of this arrangement upon request. This privacy notice also reflects the key elements of that arrangement.

For more information about the relevant Alleima entities, please click [here](#).

Personal data that we collect about you

In the below table we describe what categories of personal data that we process with examples of types of personal data.

<i>Categories of personal data</i>	<i>Examples of types of personal data</i>
<i>Account details</i>	Username (email address) and authentication credentials
<i>Background check data</i>	Information relating to background checks carried out, including the type of check and the outcome
<i>Communication data</i>	Content in e-mail and other forms of communication
<i>Contact information</i>	Address, e-mail address, phone number
<i>Demographic data</i>	Information regarding your profile normally provided by you in your application documents, for example age and citizenship
<i>Employment data</i>	Information about your current position and employer
<i>Identity data</i>	Name, personal identity number (where voluntarily provided by you)
<i>Performance data</i>	Interview evaluation, candidate assessments
<i>Picture, video and audio material</i>	Photo included in your resume, and any video or audio material uploaded by you as part of your application
<i>Skills data</i>	Education, professional experience, courses, qualifications, supporting training documentation, languages spoken
<i>Test data</i>	Information from tests completed as a part of the recruitment process, such as the type of test, date of testing and test results

From which sources we collect personal data

We collect personal data from the following sources:

- **You.** We collect personal data that you provide to us, for example in your application, resume and cover letter.
- **Recruitment agencies.** Where applicable, we use recruitment agencies to assist us in recruiting for certain positions. In such cases, we collect the personal data they share with us.
- **Reference persons.** As part of the recruitment process, we may carry out reference checks and collect the personal data that reference persons provide about you.
- **Group companies.** Companies within the Alleima group may share personal data with each other where relevant for the recruitment process or related communication.
- **Publicly available sources.** We may collect personal data about you from publicly available sources, such as social networking platforms or public registers.
- **Background check companies.** We may collect personal data about you from background check companies we collaborate with, depending on the position you have applied for and how far you have progressed in the recruitment process.
- **Other third parties.** We may also receive personal data about you from other external third parties, for example in connection with communication relating to your application.

For which purposes we use your personal data

We collect and use personal data for various purposes. To read more about which personal data, which legal basis that we rely on for the processing of your personal data for each purpose and for how long your personal data is stored in relation to the relevant categories of individuals, please see our [detailed information on our use of personal data](#).

How we share your personal data

Transfer of personal data to other external recipients (controllers)

We share your personal data with various external recipients, where necessary, for the purposes for which we process your personal data as described in this privacy notice. These recipients are responsible (controllers) for their own processing of your personal data, unless we have stated otherwise.

To read more about for which purposes that we share your personal data and the legal bases for such sharing, please see our [detailed information on our use of personal data](#), where we have outlined in relation to each purpose for processing of personal data the external recipients that we share your personal data with.

Transfer of personal data to service providers (processors)

We also transfer personal data to service providers that we have engaged when necessary for the purposes for which we process personal data as described in this privacy notice. These service providers provide, for example, IT, recruitment and communication services to us.

The service providers which process personal data on our behalf and in accordance with our instructions act as data processors. These service providers may not process your personal data for their own purposes and are contractually and legally obligated to protect your personal data and to ensure appropriate security and confidentiality.

Where we process your personal data

As a main rule, we store your personal data within the EU/EEA. However, in certain cases, we transfer your personal data to recipients located in third countries outside the EU/EEA, for example to service providers engaged by us or Alleima group companies in such countries.

To ensure an essentially equivalent level of protection for your personal data when transferred (or otherwise made available) to service providers in third countries which do not provide an adequate level of protection, we generally rely on the EU Commission's adopted [standard contractual clauses for international transfers](#) according to decision 2021/914 and implement supplementary measures as necessary to ensure an essentially equivalent level of protection for your personal data as provided under the EU GDPR.

We also rely upon adequacy decisions issued by the EU Commission where personal data is transferred to countries and recipients covered by such decisions (i.e. where the EU Commission has determined that such country and/or recipient provides an adequate protection). By way of example, this includes the EU-US Data Privacy Framework for transfers to the United States and the UK adequacy decision for transfers to the United Kingdom.

Similarly, where your personal data is processed by an Alleima entity in the UK, transfers of personal data outside the UK (restricted transfers) will only occur where the recipient is located in a country or territory subject to an "adequacy regulation" issued by the UK Government. This includes, for example, transfers to the EU/EEA and the United States. Transfers to other countries that are not subject to adequacy regulations may also occur, in which case we rely on the UK-approved [standard data protection clauses for restricted transfers](#), and implement supplementary measures as necessary to ensure an essentially equivalent level of protection for your personal data as provided under the UK GDPR.

Your rights

You have the following rights in relation to your personal data under the GDPR:

- Access to and receive a copy of your personal data (Article 15).
- Rectify or supplement your personal data (Article 16).
- Delete your personal data (Article 17).
- Object to a processing of your personal data (Article 21).
- Restrict a processing of your personal data (Article 18).
- Obtain a copy of your personal data and have your personal data transferred to an external recipient (data portability) (Article 20).

Where the UK GDPR applies, for example if your personal data is processed by an Alleima company established in the UK, you also have the right to lodge a complaint about our processing of your personal data (Section 164A of the Data Protection Act 2018, as amended by the (Data Use and Access) Act 2025).

Automated individual decision-making

We do not carry out any automated individual decision-making which have legal effects or similar significant effects on you.

Further information on your rights

Please note that each right above comes with certain caveats and exemptions. This means that these rights only may be successfully exercised in certain situations. For more information on your rights and when they apply, see for example the information provided by the Swedish Authority for Privacy Protection available on their [website](#).

Exercise your rights

If you wish to exercise your rights at any time, please contact by using the [form](#) on our website.

If possible, we would be grateful if you use the e-mail address that you have registered with us or used when you have previously been in contact with us. This would make it easier for us to manage your request.

Right to lodge a complaint

You have the right to lodge a complaint with your supervisory authority. For more information about the relevant data protection authorities and how to contact them, see: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

Where the UK GDPR applies, for example if your personal data is processed by an Alleima company established in the UK, you also have the right to lodge a complaint with us about how we process your personal data. If you wish to lodge such a complaint, please contact us by using the [form](#) on our website.

For information about the data protection authority in the UK, the Information Commissioner's Office (ICO), see: <https://ico.org.uk/global/contact-us/>.

If you have any questions

Please contact us by e-mail at privacy@alleima.com if you have any questions about this privacy notice,

how we use your personal data or if you wish to exercise your rights.

You can also find contact details to each Alleima entity [here](#).

Contact details to our appointed Data Protection Officer in Germany: datenschutz@atarax.de.

Detailed information on our use of personal data

Introduction

In this detailed information on our use of personal data, we in explain the purposes for which we use personal data, the categories of personal data processed for each purpose, our legal basis for the use, for how long we store personal data and with which external recipients (in their role as controllers) that we share your personal data for each purpose.

Detailed information on our use of personal data

Job applicants

Manage the recruitment process

Examples of what we do: We process your personal data to manage the recruitment process, for example to collect and review your application (including your resume and cover letter), carry out interviews, evaluate your application, and communicate with you during the recruitment process.

Categories of personal data:	Legal basis:	External recipients:
- Contact information^{1, 2} - Identity data^{1, 2} - Performance data^{1, 2} - Demographic data^{1, 2} - Skills data^{1, 2} - Employment data^{1, 2} - Picture, video and audio material^{1, 2}	<i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The processing is necessary to satisfy our legitimate interest in managing the recruitment process. It is our assessment that our legitimate interest outweighs your interest in not having your personal data processed for this purpose, especially since you have applied for the position or otherwise shown interest in working at Alleima. Without such processing, we otherwise would not be able to assess you as a candidate.	- Recruitment agencies - Group companies

Storage period: Personal data is stored for this purpose during the recruitment process.

Data controller: The Alleima companies employing the recruiting team and/or the hiring manager act as joint controllers for this processing activity.

Carry out background checks

Examples of what we do: Depending on the position you have applied for and how far you proceed in the recruitment process, we may process your personal data to carry out appropriate background checks, such as social media checks and credit checks. If any background checks are relevant, we will let you know in advance.

Categories of personal data:	Legal basis:	External recipients:
- Contact information^{1, 2, 3} - Identity data^{1, 2, 3} - Background check data^{1, 3} - Performance data^{1, 3}	<i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The processing is necessary to satisfy our legitimate interest in carrying out relevant background checks. It is our assessment that our legitimate interest outweighs your interest in not having your personal data processed for this purpose, especially since we	- Recruitment agencies - Third parties carrying out background checks - Group companies

have a strong interest in ensuring that appropriate individuals are hired for the positions in question.

Storage period: Personal data is stored for this purpose during the recruitment process.

Data controller: The Alleima company where the HR team responsible for background checks is employed acts as controller for this processing activity.

Carry out pre-employment tests

Examples of what we do: Depending on the position you have applied for and how far you proceed in the recruitment process, we will process your personal data when carrying out and reviewing the results of pre-employment tests, such as personality and aptitude tests, if you have agreed to participate in such tests.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
- Contact information^{1, 2, 3} - Identity data^{1, 2, 3} - Test data^{1, 3}	<i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The processing is necessary to satisfy our legitimate interest in carrying out relevant pre-employment tests. It is our assessment that our legitimate interest outweighs your interest in not having your personal data processed for this purpose, especially since we have a strong interest in ensuring that appropriate individuals are hired for the positions in question.	- Recruitment agencies - Third parties carrying out tests - Group companies

Storage period: Personal data is stored for this purpose during the recruitment process.

Data controller: The Alleima company employing the recruiting team and/or the hiring manager act as joint controllers for this processing activity. Where pre-employment tests are carried out in collaboration with third-party providers, the Alleima companies may also act as joint controllers with such providers.

Carry out reference checks

Examples of what we do: We process your personal data to carry out reference checks, for example to communicate and verify your qualifications and learn more about your background, experience, and skills.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
- Communication data^{2, 3} - Skills data^{2, 3} - Identity data^{1, 2, 3} - Employment data^{1, 2, 3}	<i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The processing is necessary to satisfy our legitimate interest in contacting referees in order to obtain an opinion about you in connection with the recruitment process. It is our assessment that our legitimate interest outweighs your interest in not having your personal data processed for this purpose, especially since we have a strong interest in ensuring that appropriate individuals are hired for the positions in question. We will only contact your stated referees.	- Referee - Recruitment agencies - Group companies

Storage period: Personal data is stored for this purpose during the recruitment process.

Data controller: The Alleima company employing the recruiting team acts as controller for this processing activity.

Future recruitment

Examples of what we do: If you give your approval to such storage, we will store your application documents for future recruitment, for example to contact you if we have a vacancy for a position that suits your profile.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
• Contact information¹ • Identity data¹ • Performance data¹ • Demographic data¹ • Skills data¹ • Employment data¹ • Picture, video and audio material¹	<i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The processing is necessary to satisfy our legitimate interest in storing your personal data for future recruitment. It is our assessment that our legitimate interest outweighs your interest in not having your personal data processed for this purpose, especially since you have voluntarily requested or approved such storage.	1. Group companies

Storage period: Personal data is stored for this purpose for a period of up to 12 months following the end of the recruitment process for the position that you have applied for and for each subsequent 12-month period (or a shorter period depending on which Alleima company your application relates to) thereafter for which you have given your approval to the personal data being stored for this purpose.

Data controller: The Alleima company employing the recruiting team and Alleima EMEA AB act as joint controllers for this processing activity.

Manage your candidate account

Examples of what we do: If you have created a candidate account on Alleima's website, we will process your personal data to manage your candidate account, for example to set up your user account to allow you access to your account and its features (such as receiving alerts for new job openings and tracking ongoing applications).

Depending on the information you upload to your account, the personal data that we process may vary.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
• Account details¹ • Contact information¹ • Identity data¹ • Performance data¹ • Demographic data¹ • Skills data¹ • Employment data¹ • Picture, video and audio material¹	<i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The processing is necessary to satisfy our legitimate interest in managing your account. It is our assessment that our legitimate interest outweighs your interest in not having your personal data processed for this purpose, especially since you voluntarily created the account.	1. Group companies

Storage period: Personal data is stored for this purpose for as long as your user account is active. Your user account is active if you have used the account during the last 12 months, for example logged in with your user account.

Data controller: Alleima EMEA AB acts as controller for this processing activity.

Follow up and evaluate the recruitment process

Examples of what we do: We process your personal data to follow up on and evaluate the recruitment process, for example to create reports and statistics on the number of applications for a position.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
- Skills data¹ - Demographic data¹ - Identity data¹	Legitimate interest (Article 6.1 (f) of the GDPR). The processing is necessary to satisfy our legitimate interest in following up and evaluating the recruitment process. It is our assessment that our legitimate interest outweighs your interest in not having your personal data processed for this purpose, especially since statistics and reports will be compiled and stored at an aggregated level.	Group companies

Storage period: Reports and results at an aggregated level which do not contain any personal data, including statistics, are stored until further notice.

Data controller: Alleima EMEA AB acts as controller for this processing activity.

Fulfil legal obligations in connection with the recruitment

Examples of what we do: We process your personal data to fulfil relevant legal obligations in connection with the recruitment, for example to manage work permits, as applicable, and respond to legal requests from authorities.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
Personal data as necessary to fulfil the applicable legal obligation in each case.	Fulfil legal obligation (Article 6.1 (c) of the GDPR). The processing of your personal data is necessary to fulfil our legal obligations in connection with the recruitment.	- Public authorities - Trade unions

Storage period: Personal data is stored for this purpose for as long as required under applicable local laws.

Data controller: The Alleima company that is recruiting for the position and is subject to the legal obligation acts as controller for this processing activity. To the extent other Alleima companies are involved in the processing activity, such as the Alleima companies employing the recruiting team and/or the hiring manager, and any other Alleima company assisting with work permits, that Alleima company and those companies act as joint controllers.

Referees to job applicants

Carry out reference checks

Examples of what we do: We process your personal data to carry out reference checks, for example to communicate with you as a referee and verify the relevant candidate's qualifications and learn more about the candidate's background, experience, and skills.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
- Communication data^{1, 2} - Employment data^{1, 2} - Contact information^{1, 2} - Identity data^{1, 2}	Legitimate interest (Article 6.1 (f) of the GDPR). The processing is necessary to satisfy our legitimate interest in communicating with you as a referee	- Recruitment agencies - Group companies

in order to obtain your opinion about the relevant candidate.

It is our assessment that our legitimate interest outweighs your interest in not having your personal data processed for this purpose, especially since we have a strong interest in ensuring that appropriate individuals are hired.

Storage period: Personal data is stored for this purpose during the recruitment process.

Data controller: The Alleima company employing the recruiting team acts as controller for this processing activity.

Job applicants and referees

Manage sales and restructuring of all or parts of the business

Examples of what we do: If all or parts of the business would be sold, or in any other way transferred or restructured, we process your personal data where necessary for this purpose. Should the business be transferred to a buyer, your personal data would also be transferred and disclosed to the buyer. The buying company would in such case be responsible (data controller) for your personal data and the processing that takes place for the same purposes as stated in this privacy notice, unless you receive any other information in connection with the sale.

Categories of personal data:

Relevant categories of personal data as are necessary to manage the sale or re-structuring of all or parts of the business in each case.

Legal basis:

Legitimate interest (Article 6.1 (f) of the GDPR). The processing of your personal data is necessary to satisfy our legitimate interest in managing a sale or restructuring of all or parts of the business.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose if the buyer carries out the same or similar type of business that we do.

External recipients:

1. Buyers/investors
2. Potential buyers/investors
3. External advisors
4. Group companies
5. Public authorities

Storage period: Personal data is stored for this purpose for the period that is necessary to manage the sale or the restructuring.

Data controller: The Alleima company that is or was recruiting for the position acts as controller for this processing activity. To the extent other Alleima companies are involved in the processing activity, the recruiting Alleima company and those companies act as joint controllers.

Establish, exercise and defend legal claims

Examples of what we do: We process your personal data where necessary to manage, defend and exercise legal claims in an individual case, for example in connection with a dispute or a court proceeding.

Categories of personal data:

Relevant categories of personal data needed for managing and defending a legal claim in the individual case.

Legal basis:

Legitimate interest (Article 6.1 (f) of the GDPR). The processing of your personal data is necessary to satisfy our legitimate interest in managing, defending and exercising legal claims.

External recipients:

1. Counterparty
2. Courts
3. Debt collecting companies
4. External advisors

It is our assessment that our legitimate interest clearly outweighs your interest of not having your personal data processed for this purpose.

5. Insurance companies
6. Relevant authorities
7. Group companies

Storage period: Personal data is stored for this purpose for the period as necessary to manage, defend and/or exercise the legal claims.

Data controller: The Alleima company to which the legal claim relates acts as controller for this processing activity. To the extent other Alleima companies are involved in the processing activity, that Alleima company and those companies act as joint controllers.

Fulfil our legal obligations

Examples of what we do: We process your personal data where necessary to fulfil our legal obligations, for example accounting obligations and obligations under the GDPR.

Categories of personal data:

Relevant categories of personal data that are necessary to fulfil the specific legal obligation.

Legal basis:

Fulfil legal obligation (Article 6.1 (c) of the GDPR). The use of your personal data is necessary to fulfil our legal obligations.

External recipients:

1. Relevant authorities

Storage period: Personal data is stored for such period that is necessary for us to fulfil the specific legal obligation.

Data controller: The Alleima company to which the legal obligation relates acts as controller for this processing activity. To the extent other Alleima companies are involved in the processing activity, that Alleima company and those companies act as joint controllers.

Respond to legal requests

Examples of what we do: We process your personal data to respond to legal requests from authorities, for example law enforcement, tax authorities or any other authorities.

Categories of personal data:

All categories of personal data as necessary to respond to and evaluate the request in each case.

Legal basis:

Fulfil legal obligation (Article 6.1 (c) of the GDPR). The processing of your personal data is necessary to fulfil our legal obligations.

Legitimate interest (Article 6.1 (f) of the GDPR). If there is no explicit legal obligation requiring that we respond to the legal request, but we consider that we and the public authority have a legitimate interest (which outweighs your privacy interest), we rely on this legitimate interest for the use of your personal data for this purpose.

External recipients:

1. Relevant authorities

Storage period: Personal data is stored for this purpose for the period that is necessary to respond to the specific legal request and thereafter for the period as necessary to document the request and our response to the request.

Data controller: The Alleima company to which the legal request relates acts as controller for this processing activity. To the extent other Alleima companies are involved in the processing activity, that Alleima company and those companies act as joint controllers.