



**Global Tunnelling Experts
Danmark ApS**
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Global Tunnelling Experts' personal data policy for staff data and recruitment purposes

Global Tunnelling Experts have adopted this personal data policy for staff data and recruitment purposes, which applies to all group employees in connection with the processing of personal data about our employees and job applicants.

We are data controllers

As employers, Global Tunnelling Experts are data controllers of the personal data that we collect and process about our employees – present, potential and former employees – and we must ensure protection of the rights enjoyed by our employees under personal data legislation.

About Global Tunnelling Experts

Global Tunnelling Experts consist of a group of companies, which are all joint data controllers in relation to the data that Global Tunnelling Experts process about you. You can find further information about the companies [here](#).

Global Tunnelling Experts Turkey and Global Tunnelling Experts Qatar are placed in unsecure third countries. The Global Tunnelling Experts group has therefore concluded Standard Contractual Clauses adopted by the European Commission to ensure sufficiently protection of personal data shared with Global Tunnelling Experts Turkey and Global Tunnelling Experts Qatar.

Global Tunneling Experts UK Ltd. are based the United Kingdom (UK). UK withdrew from the European Union on 31 January 2020 and became a third country. As part of the new trade deal between EU and UK, the EU agreed to delay transfer restrictions until 30 June 2021 (known as the bridge). This enables personal data to flow freely from the European Economic Area (EEA) to the UK until either adequacy decisions are adopted, or the bridge ends. The Global Tunnelling Group and Global Tunneling Experts UK Ltd. has concluded Standard Contractual Clauses adopted by the European Commission to secure free and safe transfer of data to Global Tunneling Experts UK Ltd.

You can find further information about transfer of data to third countries in the below section “Transfer of personal data to third countries”.

You are always welcome to contact your nearest Global Tunnelling Experts office if you have questions about our processing of your personal data.

Global Tunnelling Experts have appointed Global Tunnelling Experts (Danmark) ApS as the point of contact for questions about Global Tunnelling Experts' processing of personal data:

Global Tunnelling Experts Denmark
Gulagervej 3
DK-4173 Fjenneslev
Contact: Claus Nielsen E: gdpr@global-tunnelling-experts.com

When we ask you to make your personal data available to us, we inform you about which data about you we process and for which purpose. You receive the information at the time when we collect your personal data.

If we collect data about you from others, e.g. a supplier, authority or partner, we inform you about it within 30 days of having collected your personal data – but usually sooner. We also inform you about the purpose of the collection and the legal basis entitling us to collect your personal data.

Processing of personal data

The purpose of Global Tunnelling Experts' processing of your personal data is administration and management of the employment relationship, including your terms of employment in the form of pay, holidays and other matters that continually and naturally arise as part of the employment.

If you are interested in working for Global Tunnelling Experts, you can contact us and be registered in our database on the basis of an informed consent. We will then keep necessary data about you with a view to being able to offer you relevant work at specific job sites with Global Tunnelling Experts' customers.

When we enter into an employment contract with you about a specific job site, the employment contract concluded is for an indefinite period of time.

You may terminate the employment contract at any time in accordance with the current notices of termination, following which you will no longer be offered work at job sites with Global Tunnelling Experts' customers.

If you do not want to share necessary and relevant data with Global Tunnelling Experts in connection with your employment, it may mean that the employment relationship cannot be continued, or that we cannot offer you work at certain job sites. We will inform you if that is the case.

We collect the data from you, your LinkedIn profile, job sites in connection with evaluation and from relevant national and foreign authorities. Our personal data policy contains a list of the categories of data that we collect about our employees.

To be able to properly manage the employment relationship, including offering our employees relevant work, Global Tunnelling Experts collect the following categories of personal data about our employees:

General data:

Name
Contact details
Employment to date
Training and education
Certificates
Other skills
Pictures
Shoe and clothes sizes
Sickness absence
Evaluations
Information about visas, work and residence permits
Relevant social data

Sensitive data:

Health information
Religion

Other data:

Personal identification number
Data about criminal activities and offences

We check and update your personal data

We only process personal data about our employees that are relevant and adequate for the specific employment relationship and the purposes defined above. Hence, we do not use personal data other than those needed for a specific purpose.

The type of personal data that is necessary to collect and store for the operation of our business may have been laid down by law. The type and scope of the personal data that we process may also be necessary to perform a contract or other legal obligation resting on us according to the law.

With a view to ensuring that we only process relevant and necessary personal data for each of our determined purposes, we ensure that we only collect the necessary amount of data. We also ensure through internal guidelines that the scope of processing is not unnecessarily large and that the storage period is not too long.

To protect you against unauthorized persons getting access to your personal data, we use IT solutions and have adopted guidelines that ensure that personal data are only accessible for relevant employees.

The legal basis for Global Tunnelling Experts' processing of personal data

We process *general data* for the purpose of performing the employment contract we have concluded with each employee. The processing of general data may also be necessary as a result of a legal obligation resting on us.

Finally, processing may be necessary for the purposes of the legitimate interests pursued by us or by a third party. It may be both during and after the termination of the employment relationship.

The legal basis for the processing of *sensitive personal data* follows from the General Data Protection Regulation and the Danish Data Protection Act.

We process *health data* if it is necessary to comply with either our customers' or your employment related health or social law obligations and/or rights.

For example, it will often be necessary for us to obtain a health certificate before posting staff at specific job sites. We only receive information about the result in relation to whether the posting involves a low, medium or high risk to the individual employee.

Furthermore, the processing of sensitive data may be necessary for the establishment, exercise or defense of legal claims.

Data about *religion* are only processed if the employee has given express consent to the processing of such data.

If you choose to withdraw the consent, it will not affect the legality of our processing of your personal data based on the consent up to the time of your withdrawal. If you withdraw the consent all personal data about religion obtained about you will be deleted.

Your *civil registration number/identification number* is processed

- o when required by law;
- o if disclosure is necessary to ensure unique identification or is required by a public authority; or
- o if it is necessary in order to comply with our or your employment, health or social law obligations and rights.

Data about *criminal offences* are only processed to the extent it is necessary for the performance of the employment contract, including when required in connection with obtaining a work permit.

Transfer of personal data to third countries

If you agree to work on a jobsite outside the EU, Global Tunnelling Experts will have to transfer some of your personal data to receivers placed outside EU.

We will only transfer necessary and relevant personal data to relevant receivers and only with the purpose of administration and management of the employment relationship. On your request, you will receive information about the specific personal data that are or will be transferred and the specific receivers.

A third country is any country, which is not member of the EU or the (EØS) EEA Corporation. You can find a list over the EU/EEA countries [here](#).

Global Tunnelling Experts Turkey, Global Tunnelling Experts Qatar and Global Tunnelling Experts UK Ltd. are unsecure third countries. The Global Tunnelling Experts group has therefore concluded Standard Contractual Clauses adopted by the European Commission to ensure sufficiently protection of personal data shared with Global Tunnelling Experts Turkey, Global Tunnelling Experts Qatar and Global Tunnelling Experts UK Ltd.

Adequate third countries offers an adequate level of protection of personal data. Only the European Commission can declare a third country as “adequate”. Such a decision is called an Adequacy Decision. That means that transfer of personal data to an adequate third country is comparable to a transmission of data within the EU. You find the list of the current adequate third countries [here](#).

Any other country is an unsecure third country. The legal basis for Global Tunnelling Experts transfer of your data to receivers placed in unsecure third countries is the employment contract with you.

We will only transfer personal data to an unsecure third country if it is necessary for the performance of the employment contract or the implementation of pre-contractual measures taken at your request, cf. the General Data Protection Regulation art. 49, para 1, litra b.

We erase your personal data when they are no longer necessary

We erase your personal data when they are no longer needed for the purpose for which we collected, processed and stored the personal data in question.

Personal data collected in connection with an employment relationship will be stored for some time after the end of the employment relationship. Generally, personal data will be stored for seven years after the end of the employment relationship.

Global Tunnelling Experts employ people from many different countries and post our employees at job sites all over the world. Consequently, the storage period has been determined on the basis of the statute of limitations with the longest deadline for claims arising from the employment relationship and its termination, and which Global Tunnelling Experts are obliged to observe.

However, your personal data will not be erased if our processing is necessary for a longer period, e.g. to observe a legal obligation or for the purpose of establishment, exercise or defense of legal claims.

We do not disclose your personal data without a legal basis

We always ensure that a legal basis exists before we disclose your personal data to a third party.

We will not obtain your consent if we are legally obliged to disclose your personal data, e.g. as part of reporting to an authority, or if the disclosure is necessary for the performance of the employment contract we have concluded with you about posting at a specific job site.

Security

We protect your personal data and have internal rules about data security

We have adopted internal rules about data security, which contain instructions and measures that protect your personal data against destruction, loss or alteration, against unauthorized disclosure and against unauthorized access to or knowledge of them.

We have established procedures for the allocation of access rights to those of our employees who process any personal data that contain information about personal interests and information that is otherwise considered confidential. We check the actual access through supervision. To avoid data loss, we continually back up our data.

In case of a security breach that results in a high risk of discrimination, ID theft, financial loss, loss of reputation or other significant inconvenience for you, we will notify you about the security breach as soon as possible and in accordance with the provisions laid down in law.

If your personal data are processed by an external partner/sub supplier, e.g. in connection with a cloud solution, we ensure that a data processing agreement has been made, and that the partner in question has adequate security procedures in

place and that compliance with such procedures is audited on an ongoing basis, e.g. by the use of IT suppliers who maintain relevant certification about IT and data security.

Your rights

You can read more about your rights [here](#)