

## Information concerning Processing of Personal Data – Ukrainian Professional Support Center

### 1. Background

Thank you for showing interest in the Ukrainian Professional Support Center (the "UPSC"), which is organized by the Skill Shift Initiative (Sw. *Beredskapslyftet*). To allow us to administer your participation, we need to collect and use your personal data. This privacy notice describes the Skill Shift Initiative's (company registration no. 802538-7759) personal data processing in its capacity as a controller (below the "Skill Shift Initiative", "us", "our" or "we"), and is directed towards those who (i) notify their interest in their capacity as a job applicant in participating in the UPSC; (ii) undergo training within the scope of the UPSC; or (iii) participate (either physically or digitally) in any of the Skill Shift Initiative's events that are arranged within the scope of the UPSC. This privacy notice is also directed towards those who represent an employer that notifies its interest in the UPSC.

We are concerned about protecting your personal data. The purpose of this privacy notice is to provide you with sufficient information about how we process your personal data and your rights within the scope of the UPSC. We process your personal data in accordance with applicable data protection legislation, including the General Data Protection Regulation ("GDPR").

For information about how your personal data is processed by the employers participating in the UPSC and which may process your personal data within the scope of recruitment processes, please contact the recruitment firm. Contact us if you need help getting in contact with the right person. If you have gone through a recruitment process and got a job, please read the employer's privacy notice about how the employer processes your personal data.

### 2. What personal data do we process?

#### Registration of your candidate profile

**Purpose:** When you register for the UPSC [here](#) and before you apply for a job via the Skill Shift Initiative within the scope of the UPSC, we will ask you to register a candidate profile. We process your personal data to enable you to participate in the UPSC and to enable us to administer your candidate profile, and thus be able to match your background and skills with available jobs.

**Categories of personal data:** We collect your first name and surname, email address, address (street address, postcode, city and country), telephone number, date of birth, gender, legal status in Sweden, information about whether you have a work permit and driving licence, language skills and other skills, preferences in terms of working hours and form of employment, previous work experience, and other information you provide directly to us by registering your candidate profile (e.g. your CV, personal letter, educational background, grades, experience, files, URLs to links containing information about you, links to social media or other information you choose to upload).

**Legal basis:** We need to process your personal data that you state in your candidate profile to enable us to administer your registration and your job applications in order to comply with our agreement with you to try to match you with potential employers.

**Storage time and/or criteria:** We will process your personal data for such time as you participate in the UPSC and will subsequently erase the personal data, unless we need the personal data to comply with any of our other purposes stated in this privacy notice.

## Selection and recruitment process

**Purpose:** If you have applied for a job within the scope of the UPSC, we need to process your personal data that we previously received from you when you registered your candidate profile (see above) to enable us to match your skills and background with an appropriate employer. If we have concluded that your candidate profile matches the job you have applied for, we need to process your personal data that we previously received from you via your candidate profile and your job application to enable us to present you as a candidate to the potential employer. This includes sharing requisite personal data about you that you sent to us with relevant employers within our network of organizations.

**Categories of personal data:** We will share personal data that you previously sent to us via your candidate profile and, where applicable, other information you chose to add to your job application for a specific job (e.g. reasons for the application).

**Legal basis:** We need to process your personal data for the purpose of administering your job application and sharing your personal data with potential employers in order to ensure that the recruitment process (e.g. selection, interviews and employment) can be carried out in order to comply with our agreement with you to try to match you with potential employers.

**Storage time and/or criteria:** We will process your personal data that is collected for recruitment purposes until the recruitment process is concluded and for up to 12 months afterwards. However, we may store certain data for a longer period of up to 2 years in order to defend ourselves against legal claims from candidates (e.g. alleged discrimination).

## Training and events

**Purpose:** Within the scope of your participation in the UPSC, the Skill Shift Initiative will invite you to training sessions and events to help you to get closer to the job market and to teach you more about relevant subjects. We will use your personal data for the purpose of inviting you to our training sessions and events. If you register for one of our training sessions and/or events, we will also use your personal data to enable us to arrange the training sessions and events. This includes potentially sharing requisite information about you with potential third parties, such as arrangers that help us to hold training sessions and/or events.

**Categories of personal data:** Personal data that is processed is the same data that we processed at earlier stages in the process (mainly contact details), but we may also collect from you any dietary preferences, where applicable.

**Legal basis:** We consider that we have a legitimate interest, based on a balance of interests, in processing your personal data to enable you to participate in the training sessions and events we arrange within the scope of the UPSC. If we ask you for your dietary preferences, these preferences will only be collected after you have granted your consent to the processing.

**Storage time and/or criteria:** We will process your personal data for such time as you participate in the UPSC and will subsequently erase the personal data, unless we need the personal data to comply with any of our other purposes stated in this privacy notice. If we process your personal data with your consent, your personal data will remain until you withdraw your consent or the purpose of our processing otherwise ends.

## Statistical analyses

**Purpose:** We may also use your personal data in order to produce statistics and perform statistical analyses of candidate demographics and evaluations of participation in the UPSC project. This includes sharing the statistics with our finance providers in aggregated form, which means that it will not be possible to relate the data included in the statistics to you as an individual.

**Categories of personal data:** We use relevant personal data that you sent to us via your candidate profile (e.g. gender, age and place of residence).

**Legal basis:** We consider that we have a legitimate interest, based on a balance of interests, in processing your personal data within the scope of our statistical analyses to enable us to evaluate and improve the UPSC and our operations, for example by adapting, administering and altering the UPSC to ensure diversity within the UPSC, and to enable us to comply with our obligations to our finance providers.

**Storage time and/or criteria:** We will process your personal data for such time as is necessary to enable us to compile the statistics. We will subsequently stop processing your personal data for this purpose, or ensure that your personal data is anonymized, unless we need the personal data to comply with any of our other purposes stated in this privacy notice.

### **Participation of employers in the UPSC**

**Purpose:** We collect and process personal data about you if you represent an employer when you notify an interest in participating in the UPSC. We process your personal data for the purpose of receiving a notification of interest in participating in the project, in order to communicate/answer questions from you about the UPSC, and to enable us to offer candidates for your workplace.

**Categories of personal data:** We collect your first name and surname, and your email address. We also collect information about your workplace and the resources you need.

**Legal basis:** We consider that we have a legitimate interest, based on a balance of interests, in processing your personal data that you state in the notification of interest to enable us to administer your notification of interest, to communicate/answer questions from you about the UPSC, and to enable us to offer appropriate resources/candidates for your workplace.

**Storage time and/or criteria:** We process your personal data for such time as is necessary to enable us to administer a notification of interest, offer appropriate candidates for your workplace, and carry out the UPSC project.

## **3. Transfers and disclosure of personal data**

In order to fulfil the purposes associated with our personal data processing, we will need to transfer your personal data to organizations in our network that advertise available jobs within the scope of the UPSC. Thus, when you apply for a job within the scope of the UPSC, relevant employers will be granted access to the personal data required to enable them to engage or employ you. These organizations are separate controllers for the purposes of your personal data.

The Skill Shift Initiative also engages services and systems suppliers of IT, communications and e.g. our website provider, which process personal data on our behalf (referred to as "**processors**"). Our processors are only permitted to process personal data according to our instructions and are also under a legal obligation to take appropriate technical and organisational safeguards to protect the data.

Where applicable, we may also disclose personal data where necessary to recipients other than those stated above, who act as independent controllers, such as finance providers for the Skill Shift Initiative, public authorities in order to comply with applicable legislation, a request/order from a court or public authority, and in order to safeguard our legitimate interest in establishing, exercising and defending legal claims.

#### 4. Transfers to third countries outside the EU/EEA

We endeavour to process all data within the EU, but, in certain cases, may transfer personal data to recipients in countries outside the EU/EEA, which do not have the same level of protection for personal data as within the EU. We will take necessary measures to ensure that the personal data is sufficiently protected, for example by entering into the European Commission's standard contract clauses (Art. 46.2 of the GDPR), available [here](#).

#### 5. Your rights

You have certain rights associated with how we process your personal data. You can find a description of these rights below. Please contact us if you would like to exercise your rights (please see section 6 below for contact details).

- **Right to request access (extract from the register).** You have the right to request information about the personal data we are processing about you, for example by requesting an extract from the register. This includes the right to receive details of whether or not we are processing personal data about you, the categories of personal data that are being processed, and the purpose of the processing.
- **Right to request rectification.** If you consider that certain personal data about you is inaccurate or incomplete, you have the right to request rectification of or to supplement your personal data.
- **Right to object to processing.** You have the right to object to our personal data processing when we base the processing on a legitimate interest. You also have the right to object at any time to processing of personal data that is being used for direct marketing purposes, including profiling. If you object to our processing, we will no longer continue the processing which is based on our legitimate interest, unless we can demonstrate compelling legitimate grounds for the processing which override your privacy interest or for the establishment, exercise or defence of legal claims.
- **Right to request restriction of the processing.** You have the right to request that we restrict the processing of your personal data if (i) you consider that the personal data is inaccurate and have requested rectification, and we must restrict the processing during the period in which the accuracy of the data is being investigated; (ii) you consider that the processing is incompatible with applicable data protection legislation and you are opposed to the erasure of personal data and instead request restriction of the use of the data; (iii) you consider that the personal data is no longer necessary for the purpose for which it is being processed, but you need it in order to establish, exercise or defend legal claims; or (iv) you have objected to the processing in accordance with the section entitled "**Right to object to processing**" above pending our assessment of our legitimate grounds.
- **Right to request erasure.** In certain cases, you can request that the personal data be erased if (i) it is no longer necessary for the purpose for which it was collected; (ii) the processing is based on your consent and you withdraw consent; (iii) the processing is taking place for direct marketing purposes and you object to the processing; (iv) you object to the processing in accordance with the section entitled "**Right to object to processing**" above and we do not have legitimate grounds that override your privacy interest; (v) you consider that the processing is incompatible with applicable data protection legislation; or (vi) the personal data must be erased to enable us to comply with a legal obligation. Please note that we can deny your request if the processing is permissible or is required to comply with a legal obligation, or to enable us to establish, exercise or defend legal claims.

- **Right to request data portability.** If we are processing personal data that you have personally provided by virtue of your consent or in order to comply with an agreement with you, and the processing is carried out by automated means, you also have the right to receive the personal data relating to you in a structured, commonly used and machine-readable format (referred to as "**data portability**") for transfer to another controller.
- **Right to submit a complaint to a competent data protection authority.** If you are not satisfied with the way in which we are processing your personal data, you have the right in all cases to submit a complaint to the competent data protection authority in the country in which you live or work or in which a potential infringement of applicable data protection legislation has occurred. [Here](#) is a list of the data protection authorities within the EU (in English). The competent data protection authority in Sweden is the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*) ([www.imy.se](http://www.imy.se)).
- **Right to withdraw consent.** For processing for which we expressly state that we are obtaining your voluntary consent, you may at any time withdraw your consent to our processing of such personal data.

## 6. Contact details and questions

Please contact us if you have any questions or comments about this policy or the Skill Shift Initiative's processing of personal data, or if you would like to exercise any of your rights set out above. Contact: Malin Crona, telephone number: 072-308 72 94, email address: [malin.crona@beredskapslyftet.se](mailto:malin.crona@beredskapslyftet.se)