

# Recruitment Privacy Notice

NRC and its entities are committed to respecting your privacy and protection of your personal data. We define personal data as information that directly identifies an individual or that makes an individual identifiable when combined with other information.

This Recruitment Privacy notice (“Privacy Notice”) applies to the processing of personal data in relation to recruitment related processes and programs. This Privacy Notice only applies to the personal data of job applications, potential candidates for employment, and those who participate in our candidate pool.

By submitting your application to us, you acknowledge that:

- You have read and understood this Privacy Notice and agree to the use of your personal data as set out herein.
- Your personal data may be transferred and processed worldwide, including in countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Privacy Notice.
- You are not required to provide any requested information to us, but your failure to do so may result in our not being able to continue your candidacy for the job for which you have applied.
- All your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.

## CONTENT OF THE PRIVACY NOTICE

This Privacy notice covers the following areas:

- Data controller
- Why we collect information
- How we may use your personal data and the lawful basis for doing so
- Automated decision-making
- Who we may disclose your personal data to
- How we protect your personal data
- Your privacy rights
- How long we keep your personal data
- How changes to this Privacy notice will be made
- Contacting us or the data protection authority

## DATA CONTROLLER

Norwegian Refugee Council  
VAT number 977 538

- We, Norwegian Refugee Council (NRC), as an independent humanitarian organisation are working to protect the rights of displaced and vulnerable people during crisis.
- NRC is responsible for processing your personal data in accordance with the General Data Protection Regulation (GDPR), applicable national and Norwegian laws.

## PERSONAL DATA WE COLLECT

The types of personal data that we request from you and the ways that we process it are determined by a combination of the requirements of the country in which the role you apply for is located and the country in which you reside. When you apply to multiple locations or for a role available in multiple countries, the personal data we request and how we process it depends on the requirements of all the countries where the position is located and where you reside.

Personal data we usually collect directly from you when you apply for a role with us through our online recruitment process includes name, work and educational history, achievements, identity documents, test results, any information that may be required due to legal requirements (e.g. residence or work permits) and other categories of data that you voluntarily decide to share with us via the applicant portal. We also process data about you which is created by our recruiting personnel in the course of their interactions with you during the recruiting process or through your participation in our assessment tools.

If you are offered a position with us, we may need to gather more information to carry out background and criminal record checks, as allowed by law. This is particularly relevant for roles involving interaction with vulnerable individuals. Additionally, we may ask you to self-disclose any investigations, allegations, or convictions related to sexual misconduct. This is to fulfil our safeguarding responsibility towards the vulnerable populations we serve and to meet our legal and donor obligations.

Under limited circumstances and to the extent permitted or required by law, we may also process special categories of data (such as health, disabilities, ethnicity) when it is necessary for a safe and successful placement in the country where the role is needed, to support our efforts to create an inclusive and diverse work environment, to provide reasonable accommodations or facilities, and to fulfil our duty of care obligations

## USE OF YOUR PERSONAL DATA

We collect and process personal data for the purpose of the recruitment process and your request for considering your application, which among other includes the following activities:

- identifying and evaluating candidates for potential employment, as well as for future roles that may become available;
- to communicate with you during the recruitment process;
- to evaluate the information provided by you, references you have provided, your assessment and test;
- if you receive an offer from us, conducting background checks, including, to the extent permitted by applicable law, screening against sanctions lists;
- maintaining records in relation to recruiting and hiring;
- protecting our legal rights to the extent authorised or permitted by law; and
- emergency situations where the health or safety of one or more individuals may be endangered.

We may also analyse your personal data or aggregated/pseudonymised data to improve our recruitment and hiring process.

## **THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

Our processing of your personal data for the purposes mentioned above is based in one or several of the following legal grounds:

- in part, on our legitimate interests to identify a suitable candidate, to communicate with you, to evaluate the information and references provided by you, as well as your assessments and tests, and to conduct background screenings (more details can be found in the Privacy Notice regarding the screening of individuals), and more generally, to protect NRC, its employees, and the vulnerable people we serve;
- in part, on your consent, where you create a profile in our applicant portal to apply and manage positions you are interest in, and where you allow us to process that information to consider you for future opportunities that may be a good match for your skills and experience. Moreover, you can use your profile to apply for future job openings without filling out information each time, enhancing your experience with us and simplifying our recruitment process for you. You have full control to update, manage, and delete your data from the applicant portal;
- in part, on our performing contractual and precontractual measures relating to our potential employment relationship with you;
- in part, to meet our legal obligations under the Norwegian and international regulations on anti-money laundering and counterterrorism and to protect the welfare of the vulnerable people we serve. For example, this may involve checks against international terrorism and sanction lists, as detailed in our Privacy notice concerning the screening of individuals.

## **THIRD PARTIES THAT THE DATA WILL BE SHARED WITH**

- NRC uses technical solutions owned or supported by third party providers when processing your personal data. <e.g.: Lexis Nexis (Bridger Insight), Oracle (NRC People), Talentech Webcruiter), Recright Oy (RecRight), Trustcruit Oy (Trustcruit), Xref (AS) Pty (Xref), Aon Assessments (Aon) are suppliers, who process personal data on NRC's behalf.>
- When we hire someone in a country where NRC does not have a registered legal entity, NRC will use a third-party provider, Deel Inc., to act as an Employer of Record. This means that Deel Inc. will handle all aspects of employment, including compliance, payroll, taxes and benefits.
- If the position is a joint role with other NGOs, your CV will be shared with our affiliates.
- NRC may share your personal data with others, such as authorities, suppliers, partners, and consultants. We disclose personal data to authorities to the extent we are under legal obligation to do so. This includes supervisory authorities in relevant countries.

## **TRANSFER OF PERSONAL DATA TO RECIPIENTS IN COUNTRIES OUTSIDE THE EU/EEA**

NRC's international and head office/representative office recruitment is accessed and managed by the NRC Global Recruitment Centre (GRC) in Nairobi, Kenya. The GRC functions as a branch office of NRC Global in Oslo and adheres to data protection standards set by Norwegian Data Protection Laws and GDPR.

All country specific recruitment and interviews are accessed and managed by the HR team where the position for which you are applying is(are) based, as well as by the recruiters and interviewers working in different countries within the NRC global entity.

- Regional office in Oslo, Norway for Asia and Latin-America: Afghanistan, Bangladesh, Iran, Myanmar, Colombia (incl. Ecuador and Panama), Venezuela, Honduras (NCA (Northern Central America) including Honduras, El Salvador and potentially Guatemala and Mexico).
- Regional office in Warsaw, Poland for Central and Eastern Europe: Moldova, Poland, Romania, Ukraine.
- Regional office in Dakar, Senegal for Central and West Africa: Cameroon, CAR, DR Congo, Mali, Burkina Faso/ Niger, Nigeria.
- Regional office in Nairobi, Kenya for Eastern Africa and Yemen: Djibouti, Ethiopia, Kenya, Somalia, South Sudan, Tanzania, Uganda, Yemen.
- Regional office in Amman, Jordan for Middle East: Iraq, Jordan, Lebanon, Libya, Palestine, Syria.

In some cases, NRC may transfer personal data to organizations in so-called third countries (countries outside of the European Economic Area). Where such transfer is made, NRC ensures one of the following conditions apply:

- the EU Commission has decided that there is an adequate level of protection in the country in question, or
- the latest Standard Contractual Clauses are executed, and any export of your personal data only takes place in accordance with data protection law of EU including GDPR,

## HOW LONG WILL THE DATA BE STORED?

NRC will keep your data:

- for as long as it is needed for the purposes for which your data was collected *<e.g.: 12 months after the end of the recruitment process, or 24 months if you have confirmed your interest in being considered for future relevant positions.>*
- as long as necessary for requirements stipulated in laws and regulations for the respective purpose.

## AUTOMATED DECISION-MAKING

We are not using automated decision-making.

## HOW WE PROTECT YOUR PERSONAL DATA

Keeping your personal data safe and secure is at the center of how we work. We use appropriate security measures to protect any information we hold from loss, misuse and unauthorized access, disclosure, alteration and destruction:

- technical *<e.g.: implementing role-based access control to ensure that only authorized personnel can access certain information; utilizing secure, verified software from reputable vendors.>*
- organizational *<e.g.: conducting regular security awareness training sessions for employees to recognize and respond to security threats; carefully selecting and regularly reviewing third-party vendors to ensure they meet the organization's security standards.>*
- administrative *<e.g.: ensuring compliance with relevant laws and regulations.>*

## YOUR RIGHTS

You, as a data subject, have the following rights in respect of personal data we hold about you:

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|---|--|
| • Request access to your personal data:               | You have a right to access the personal data we keep about you. Your right to access may, however, be restricted by legislation, protection of other persons' privacy and consideration for our humanitarian activity. |
| • Request correction of incorrect or incomplete data: | If the data is incorrect or incomplete, you are entitled to have the data rectified, within the restrictions stipulated in applicable legislation.   |
| • Request erasure:                                    | You have the right to request erasure of your data when:   |

- you withdraw your consent to the processing and there is no other legitimate reason for processing.
  - you object to the processing and there is no justified reason for continuing the processing.
  - the processing is unlawful.
  
- Limitation of processing of personal data:
 

If you contest the data's accuracy or lawfulness, or object to processing, you can request restriction to storage only. This will continue until accuracy, or our interests are verified. If erasure isn't an option, or processing is needed for a legal claim, you can request storage-only processing. We may process your data for legal claims or with your consent.
  
- Data portability:
 

You have a right to receive personal data that you have provided to us in a machine-readable format. This right applies to personal data processed by automated means only and on the lawful basis of consent or performance of a contract. Where secure and technically feasible the data can also be transmitted to another data controller by us.
  
- Lodge a complaint:
 

You have the right to lodge a complaint with your Regulator/Data Protection Authority. NRC hopes to resolve any queries or concerns you may have, however if you are unsatisfied with the reply received, you may then refer your complaint to the relevant Regulator/Data Protection Authority in your jurisdiction. In Norway the competent data protection authority is:

Datatilsynet

Postboks 458 Sentrum 0105 Oslo

<https://www.datatilsynet.no/>

Your request to exercise your rights will be assessed based on individual circumstances. We may retain and use your information to comply with legal obligations, resolve disputes, and enforce agreements.

## HOW CHANGES TO THIS PRIVACY NOTICE WILL BE MADE

We continually improve and develop our services and operations, which may lead to updates in this Privacy Notice required by change in business processes or applicable law. Where the changes are significant and/or affect your data subject rights, we will take additional steps to inform you of these changes.

Please review this Privacy Notice regularly to keep up to date.

## CONTACTING US

If you have any question in relation to how NRC processes your personal data, this Privacy Notice, or would like to exercise your rights, please contact us at:

Legal address:	Prinsens gate 2, 0152 Oslo, Norway
NRC Data Protection Officer:	Shadab Khan
E-mail:	<a href="mailto:data.protection@nrc.no">data.protection@nrc.no</a>