Privacy Policy

1. Introduction

We at Talentwise value your integrity. This privacy policy explains how we collect, store, and share your personal data.

2. Data Controller

Talentwise AS is the data controller for the processing of your personal data that involves collecting and compiling information into a report in connection with the following checks:

- Education verification
- Residential address
- Emigration and immigration
- Citizenship
- Driving license categories
- HPR number
- Presence in editorially controlled media
- Activity on social media
- Employment history (employers, periods of employment, occupation)

Company name: Talentwise AS

Organisation number: 925 116 173

Postal address: Værftsgata 1C, 1511 Moss

Email: info@refapp.no

3. Data Processed

As the data controller, we process the following personal data:

- Degrees
- Grades

- Educational institutions
- Periods of study
- Current residential address
- Historical residential addresses
- Citizenship
- Relocation from Norway to another country
- Relocation to Norway from another country
- Emigration from Norway to another country
- Driver's license
- HPR number
- Information from editorially controlled media (for example, statements in interviews in publicly accessible articles)
- Information from open social media profiles (for example, public posts and comments)
- Employment history

4. Purpose of the Processing

We process your personal data for the following purposes:

- To verify your information on behalf of the client.
- To compile a report for the client to support their employment decision.

5. Legal Basis

The processing of personal data is carried out based on the legal ground of **legitimate interest** according to Article 6.1 f of the General Data Protection Regulation (GDPR)

6. Sources

The personal data we process may come from various sources:

- **The Diploma Registry (Vitnemålsportalen).** If your educational information is available in the Diploma Registry, you can log in to the Diploma Registry and share your study results with us from there.
- **Educational institutions where you have studied.** If your educational information is not available in the Diploma Registry or if you do not share the information from the Diploma

Registry with us, the information may be collected directly from the relevant educational institution.

- **The State Register of Employers and Employees (Aa-registeret).**
- **The National Population Register (Folkeregisteret).**
- **The Norwegian Public Roads Administration (Statens vegvesen).**
- **The Norwegian Register of Health Personnel (Helsepersonellregisteret).**
- **Digital media archives.**
- **Open social media.** Publicly accessible profiles on platforms such as LinkedIn and X.
- **Directly from you.** In some cases, for example, if your educational information is not available in the Diploma Registry, it may be necessary for you to provide us with information about your education yourself.

7. Who Receives Access to the Data

We share your personal data with:

- **The client.** The client is usually an organization with which you are considered for a position, and which has ordered a background check. Once the client has received the report, they are independently responsible as the data controller for their subsequent processing of the personal data in the report, for example, when using the information as a basis for assessment in employment decisions or when storing it in their own recruitment system.
- **The educational institution.** In cases where we need to contact the educational institution to verify information you have provided to us. We only share the data required to enable the verification.
- **Our service providers.** Service providers who process personal data on our behalf, such as IT providers for the operation/hosting of our systems. These parties may only process personal data in accordance with our instructions.

8. Storage Period

The client has access to your personal data for 14 days from the date the report is delivered (unless otherwise agreed). After this, the client's access is automatically removed. Talentwise AS retains the personal data processed as part of the background check for up to 24 months after the report has

been delivered. This longer storage period is needed, among other things, to be able to handle any objections and complaints.

9. Transfer to Third Countries

Our services normally do not involve any transfer of personal data outside the EU/EEA. In some cases, such a transfer may still be necessary, for example, when we verify education issued by educational institutions in countries outside the EU/EEA. If the country to which the data needs to be sent lacks an adequacy decision from the European Commission, we only carry out the transfer after you have given explicit consent according to Article 49.1 a of the GDPR. Before you consent, we inform you about the risks that may be associated with the transfer. The transfer takes place solely for the specific purpose of verifying your education and with the minimum necessary amount of data.

When conducting background checks that include social media searches, we use a subcontractor based in the United States. The transfer of your personal data (primarily identification data required to conduct the search) to the US is carried out on the basis of the European Commission's adequacy decision (EU-U.S. Data Privacy Framework), as the provider is certified under this framework. This means that your personal data is guaranteed a level of protection equivalent to that applicable within the EU/EEA.

10. Your Rights

You have the following rights regarding your personal data:

- **Right of access.** According to Article 15 of the GDPR, you have the right to receive information about what personal data we process about you and to receive a copy of it.
- **Right to rectification.** According to Article 16 of the GDPR, you can request that we correct inaccurate or incomplete data about you.
- **Right to erasure ("right to be forgotten").** According to Article 17 of the GDPR, you have the right to request that we erase your personal data under certain conditions.
- **Right to restriction of processing.** According to Article 18 of the GDPR, you have the right to request that the processing of your data be restricted under certain conditions.

- **Right to data portability.** According to Article 20 of the GDPR, you have the right to receive the personal data you have provided to us yourself in a structured, commonly used, and machine-readable format.
- **Right to object.** According to Article 21 of the GDPR, you have the right to object to the processing of your personal data based on our balancing of interests (Article 6.1 f). We will then cease the processing unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms.

11. Automated Individual Decision-Making

Talentwise AS does not use automated individual decision-making, as defined in Article 22 of the GDPR, in the personal data processing for which Talentwise AS is the data controller.

12. Contact Us

You are welcome to contact us if you have questions about this privacy policy or how we process your personal data:

Postal address: Værftsgata 1C, 1511 Moss

Email: info@refapp.no

Website: www.refapp.com

13. Complaints

If you believe that we have processed your data incorrectly, please feel free to contact us at info@refapp.no. According to Article 77 of the GDPR, you have the right to lodge a complaint with a supervisory authority. For our business, the Norwegian Data Protection Authority (Datatilsynet) is the supervisory authority. Below are the contact details for Datatilsynet:

Postal address: Box 458 Sentrum, 0105 Oslo

Email: postkasse@datatilsynet.no

Website: www.datatilsynet.no