

Privacy Notice for Applicants

Thank you for your interest in Nox Medical ehf (hereinafter “we”, “us” or “Nox Medical”) and your application. By sending us your application documents, you are providing us with personal data. We take the protection of your personal data very seriously. Your personal data will be processed exclusively in accordance with the applicable data protection legislation, in particular the provisions of the European Data Protection Regulation (hereinafter: "GDPR"). In the following we would like to give you an overview of the processing of your personal data by us and about your rights regarding the processing of your personal data. Please note that the terms used, such as "personal data" or "processing" correspond to the definitions according to Article 4 GDPR. If you would like to take a look at the GDPR yourself, you can find it [here](#).

If you have any questions on the processing of your personal data or wish to exercise your rights as a data subject, please contact us using the contact details below.

1 Information about the Controller of the data processing

The joint controllers of the processing of your data within the meaning of Article 4 No. 7 GDPR is:

Nox Medical ehf
Katrínartún 2
105 Reykjavík
Iceland

Tel: +(354) 570 7170
E-Mail: info@noxmedical.com

Nox Health Group Inc.
5000 Research Parkway, Suite 500
Suwanee, GA 30024
USA

Tel: 855-617-6691
Fax: 678 669 2274
E-Mail: privacy@noxhealth.com

If you have any questions on the processing of your data or wish to exercise your rights as a data subject (see section “Your rights as a data subject”), please contact us using the contact details above.

You can also contact our data protection officer directly at dataprotection.nox@v-formation.gmbh or our postal address with the addition “Data protection officer / DPO”.

2 Processing of personal data

In the following, we would like to give you an overview of the data processing that typically takes place as part of your application to Nox Medical.

In addition, there may always be situations in which data processing takes place that are not mentioned here. In these cases, we will provide you with separate data protection information (e.g., privacy policy on our website) that relates to the respective situation, insofar as this is required by law.

2.1 Applications via Workable

If you apply for a vacancy or send an unsolicited application via our application system (<https://apply.workable.com/nox-medical/>) available on our career website (<https://noxmedical.com/about/careers/>), you voluntarily submit your personal data. In addition, further data may be collected and processed during the application process and – if applicable - the interviews.

Please note that we exclusively consider applications that are submitted via our career website. All applications that reach us by other means will not be processed further. However, personal data will be processed to notify the respective applicant of the use of our career website. Application data that have been submitted by other means than our career website will be deleted after the corresponding notification has been sent.

2.1.1 What categories of personal data do we process?

The following categories of personal data are processed within our application process:

- general personal data (e.g., name, date of Birth, residency)
- contact information (e.g., postal and/or e-mail address, telephone number)
- qualification data (educational level/degrees, appraisals, certificates, qualifications)
- if applicable, further information which you have submitted

2.1.2 What are the purposes and legal basis for the data processing?

We process the data you have sent us in connection with your application in order to check your suitability for the position you applied for and to carry out the application process.

Of course, this is done in compliance with the provisions of the EU General Data Protection Regulation (GDPR).

When using the application tool, we process the above data for the following purposes and on the following legal basis:

- to carry out pre-contractual measures on the basis of Article 6 (1) (b) GDPR
- to ensure the proper conduct of our application procedure and the establishment, exercise or defence of legal claims pursuant to our legitimate interests on the basis of Article 6 (1) (f) GDPR.

2.1.3 Does a transfer of your data to third countries take place?

In the course of our application process, we use the service from Workable Inc., 33 Arch Street, 3110, Boston, MA 02110, USA (hereinafter “Workable”). We cannot exclude that your data will be transferred to Workable-servers in the USA. Please note that an adequate level of data protection within the meaning of Article 45 GDPR cannot currently be guaranteed in the USA. Possible risks when processing your data in the USA are that access to your data by government agencies, such as security authorities and/or intelligence services, cannot be ruled out and that your data may be processed by them without your knowledge and without any enforceable legal remedies being available to you. Possible transfers of your data to the USA are subject to the EU standard contractual clauses pursuant to Article 46 (2) (c) GDPR. Please contact us via our contact details above to obtain a copy of the relevant standard contractual clauses. For information on data protection at Workable, please refer to the privacy policy of workable, available at <https://www.workable.com/privacy>.

2.2 Video conferencing

If you are invited to a job interview, this may take place in the form of a video call. Your data will be processed in the process.

The scope of the data processed depends on the information you provide before or during participation in the video call.

2.2.1 What categories of personal data do we process?

Typically, the following data are processed when participating in our video calls:

- master data (first and last name)
- contact data (email address, phone number)
- user account data (display name, profile picture) – if applicable
- image, video, sound and text data
- online and meta data (IP address, information on end device, browser type, user ID, user settings, operating system, logfile data, date and time of video call, subject of video call etc.)

2.2.2 What are the purposes and legal basis for the data processing?

Within the scope of video calls, we process the data mentioned above for the following purposes and on the following legal basis:

- to carry out pre-contractual measures on the basis of Article 6 (1) (b) GDPR
- to ensure the proper conduct of our application procedure and the establishment, exercise or defence of legal claims pursuant to our legitimate interests on the basis of Article 6 (1) (f) GDPR.

2.2.3 Does a transfer of your data to third countries take place?

To conduct our video calls, we use video conferencing services from US providers (e.g., Zoom or Google Meets). If you participate in ours in a video call, we cannot exclude that your data will be transferred to the respective provider of the video conferencing tool. Please note that an adequate level of data protection within the meaning of Article 45 GDPR cannot currently be guaranteed in the USA. Possible risks when processing your data in the USA are that access to your data by government agencies, such as security authorities and/or intelligence services, cannot be ruled out and that your data may be processed by them without your knowledge and without any enforceable legal remedies being available to you. The transfer of your data to video conferencing providers based in the USA is subject to the EU standard contractual clauses pursuant to Article 46 (2) (c) GDPR. Please contact us via our contact details above to obtain a copy of the relevant standard contractual clauses. In addition, technical data in particular may also be processed by the respective video conferencing provider itself. For details, please refer to the privacy policy of the respective video conferencing provider, which will be provided to you in advance of the respective video call.

3 Purposes and legal basis of the data processing

We process the data you have sent us in connection with your application in order to check your suitability for the position you applied for and to carry out the application process.

Of course, this is done in compliance with the provisions of the EU General Data Protection Regulation (GDPR).

The legal basis for the processing of your personal data is Article 6 (1) (b) GDPR, as the processing of your data is necessary for the implementation of pre-contractual measures. In addition, your data may be processed on the basis of our legitimate interests on the basis of Article 6 (1) (f) GDPR, namely to ensure the proper execution of our application process and the establishment, exercise or defence or legal claims.

We require your personal data insofar as it is necessary for the decision about your employment at Nox Medical. The absence of relevant personal data in the application documents may mean that we cannot consider you in the further application process.

We do not use purely automated processing to make a decision for or against your application.

4 Storage Duration

In general, we process your personal data as long as it is required for the purposes mentioned above, unless you have effectively objected to the processing of your personal data on the basis of or legitimate interests. In the event of an objection to the processing of your personal data, we will delete your personal data, unless we are able to show that there are compelling reasons that allow the continued data processing. Insofar as statutory retention obligations exist, we will store the data affected by this for the duration of the corresponding retention period.

Applications sent by email or post will be deleted immediately or returned with the request to resubmit the application via our application system available on our career website.

If you are hired, we will transfer your application documents (from our application system) to your personnel file. In the event of a rejection, your application documents will be deleted no later than six months after completion of the application process, unless you have requested deletion beforehand by email to hr@noxmedical.com.

5 Data recipients

We only pass on your personal data to external parties if this is necessary to fulfil the above-mentioned purposes, we are legally obliged to do so, or if you have given your consent for this.

External recipients may include, service providers that we use to fulfil the above-mentioned purposes, for example in the area of technical infrastructure and maintenance. These service providers are carefully selected and process your personal data exclusively for the purposes specified by us and in accordance with our instructions.

External recipients of your personal data can be in particular

- affiliated companies;
- service providers;
- courts, arbitration tribunals, authorities or legal advisors, if this is applicable to comply with applicable law or to assert, exercise or defend legal claims.

6 Third country data transfers

If it is necessary for the above-mentioned purposes (e.g., if you applied for a respective job), your personal data may be transferred to Nox Health Group, 5000 Research Parkway, Suite 500 Suwanee, GA 30024 USA (hereinafter “Nox Health”). Any data transfers to Nox Health are carried out on the basis of Article 46 (1) (c) GDPR and are subject to the EU standard contractual clauses concluded between us and Nox Health.

Anyway, in the event that personal data is transferred to third parties whose registered office, place of residence or place of data processing is not located in a member state of the European Union or the European Economic Area (hereinafter referred to as “third countries”), we will ensure before transferring your personal data that an adequate level of data protection exists in the third country concerned., apart from the exceptions permitted by law. An adequate level of data protection can be guaranteed, for example, by the conclusion of EU standard contractual clauses or the existence of so-called binding corporate rules (BCR). Please contact us via the contact options provided to you as part of this privacy policy to obtain a copy of the specific guarantees for the transfer of your data to third countries.

7 Your rights as a data subject

As a data subject, you have the following rights within the statutory limits:

Right to information (Article 15 GDPR)

You have a right to obtain information about the personal data concerning you that is processed by us.

Right to rectification (Article 16 GDPR)

You have the right to request that we immediately correct inaccurate data and complete incomplete data, provided that the legal requirements are met.

Right to erasure (Article 17 GDPR)

You have the right to request the erasure of your personal data, provided that the legal requirements are met and in particular if (1) your data is no longer necessary for the purposes stated in this privacy notice, (2) you have withdrawn your consent and there is no other legal basis for the processing, (3) your data has been processed unlawfully or (4) you have objected to the processing of your data and there are no overriding legitimate grounds for the processing.

Right to restriction of processing (Article 18 GDPR)

You have the right to request that we restrict the processing of personal data concerning you, in particular if you dispute the accuracy of the data or if the processing of your data is unlawful and you request restriction instead of erasure.

Right to data portability (Article 20 GDPR)

If your data is processed on the basis of a contract or on the basis of your consent, you have the right to receive your data in a structured, commonly used and machine-readable format or to have your data transferred to another controller, provided that the legal requirements for this are met.

Right to object (Article 21 GDPR)

You have the right to object to the processing of your data at any time on grounds relating to your particular situation, insofar as the legal basis for our processing of your data is the maintenance of our legitimate interests or the legitimate interests of a third party pursuant to Article 6 (1) (f) GDPR. If you exercise your right to object, we will stop processing your data unless we can demonstrate compelling legitimate grounds for continuing the processing which override your interests, rights and freedoms, or the processing is for the purpose of asserting, exercising or defending legal claims.

Right of withdrawal (Article 7 para. 3 GDPR)

If we process your data on the basis of your consent, you have the right to withdraw this consent at any time with effect for the future. This does not affect the lawfulness of the processing until the time of the withdrawal.

Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority if you consider that the processing of personal data concerning you infringes the GDPR. You may exercise this right with a supervisory authority in the member state of your ordinary residence, place of work or place of the alleged infringement or with the supervisory authority responsible for us. The supervisory authority responsible for us is the Icelandic data protection authority – Persónuvernd, Rauðarárstígur 10, 105 Reykjavík, Iceland.

To exercise your rights as a data subject, please contact us using the contact details under “Information about the Controller of the data processing”.

This privacy policy may be subject to change. The current version of this privacy policy applies.