

# Privacy Notice Careers

## GENERAL

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This Privacy Notice is applicable to all applicants and presumptive candidates. Where appropriate based on the context of this Privacy Notice, the term “recruitment” shall equally apply to “individual applications”, “referrals” and “recruitment via agencies”.

This Privacy Notice may also be applicable to applicants’ referees and/or next of kin. If you provide H&M with information regarding your referees, next of kin, and/or candidates recommended by you. If you provide H&M with information of these third parties, you are responsible to forward this information to the relevant persons.

### **Who is responsible for processing your personal data?**

H & M Hennes & Mauritz GBC AB or H & M Hennes & Mauritz SVERIGE AB (referred to as “we” “us” or “H & M Company”), and/or the H&M Group Company, is the controller(s) of the personal data under applicable data protection law, unless otherwise explicitly stated in each chapter below.

### **Where do we store your data?**

The data that H&M Company collects from you is stored either in the country where H&M Company is established, in a country within the European Economic Area (“EEA”) and/or transferred to and processed in a country outside of the EEA if this is necessary for carrying out certain tasks, achieve certain goals etc. Any cross-border transfer of your personal data will be carried out in compliance with applicable laws.

Whenever applicable, for transfers of personal data from a country within the EEA to a country outside of the EEA which has not been qualified for an adequacy decision by the European commission, H&M Company use Standard Contractual Clauses as well as other permitted safeguard measures to protect your privacy and other rights during and after the cross-border transfer.

### **Who has access to your personal data?**

Only H&M Company has access to your personal data, including its contracted suppliers and trusted partners carrying out certain tasks on its behalf. H&M Company may also share personal data with other legal entities within the H&M Group to the extent necessary to accomplish the intended purpose of processing, however, without compromising any of your rights.

Please be aware that many of these third-party recipients have an independent right or obligation to process your personal data in their own responsibility. We may share your personal data with external parties under the following circumstances:

Purpose of processing	Category of recipients
Talent acquisition and recruitment	Recruitment agencies, Applicant Tracking System (ATS) provider, specialized assessment centre providers, background/reference checking provider
IT environment that facilitates daily operations and supports employment processes	Information Technology, integrated platform and service providers, external training providers
Compliance with labour practice and applicable laws	Trade union, public authorities, government bodies, auditors
Health and Safety	Insurance provider, travel tracker service provider, emergency response planner, health service management, counselling and support service, auditors, public authorities
Cyber-security, asset protection, loss prevention, and investigation of disloyal or malicious activities	Security service providers, forensic firms, public authorities, surveillance camera providers, insurance providers
Organisational development and optimization	Survey service providers, compensation benchmarking agencies, trade unions, counselling and support service, internal and external communication channels

**What is the legal ground for processing?**

H&M is not allowed to collect, process, use, store etc. personal data without a valid legal ground. Lawfulness of processing personal data may be derived from your pre-employment contract, statutory obligations, your consent, or from our legitimate interest as an employer. For each specific processing purpose, we will inform you about which legal ground that will apply, and what rights you are entitled to exercise.

**What are your rights?**

**Right to access:**

You have the right to request information about the personal data we hold on you at any time. We will provide you with your requested information via appropriate means of communication.

**Right to portability:**

Whenever H&M Company process your personal data by automated means based on your consent or based on an agreement, you are entitled to obtain a copy of your data in a structured, commonly used and machine-readable format transferred to you or to another party. This only includes the personal data you have submitted to us.

**Right to rectification:**

You have the right to request rectification of your personal data if they are incorrect, including the right to have incomplete personal data completed.

**Right to erasure:**

You have the right to request erasure of your personal data processed by us at any time. Your personal data may continue to be processed under certain circumstances, we will fully erase your personal data

once it is no longer necessary for the purpose for which we originally collected or processed it, or when we are no longer legally required to process it.

**Your right to object to processing based on legitimate interest:**

You have the right to object to processing of your personal data that is based on H&M Company's legitimate interest. H&M Company will stop processing your personal data and immediately erase it, unless we can demonstrate a legitimate reason for the processing which overrides your interest and rights or due to legal claims.

In cases where your personal data has been processed via an automated decision making or profiling procedure, you have the right to obtain an explanation and challenge the decision reached.

**Right to restriction:**

You have the right to request that H&M restricts the process of your personal data under the following circumstances:

- if you object to a processing operation based H&M's legitimate interest, H&M shall restrict all processing of such data pending the verification of the legitimate interest;
- if you have claim that your personal data is incorrect, H&M must restrict all processing of such data pending the verification of the accuracy of the personal data;
- if the processing is unlawful you can oppose the erasure of personal data and instead request the restriction of the use of your personal data instead;
- if H&M no longer needs the personal data but it is required for you to make of defending legal claims.

**How can you exercise your rights?**

We take data protection very seriously and therefore we have a dedicated process to handle your requests in relation to your rights stated above. You can send in your request in the following ways:

- Employees with access to ServiceNow – use SelfService to place a request.
- Alternatively, email request to: [GDPRemployHO@hm.com](mailto:GDPRemployHO@hm.com)

**Data Protection Officer:**

We have appointed a Data Protection Officer (DPO) to ensure that we continuously process your personal data in an open, accurate and legal manner. You reach our Data Protection Officer at:

[dataprivacy@hm.com](mailto:dataprivacy@hm.com)

**Right to complain:**

If you consider H&M to process your personal data in an incorrect way, we expect you to contact us immediately. You also have the right to turn in a complaint to the competent supervisory authority.

Integritetsskyddsmyndigheten/Swedish Authority for Privacy Protection

e-mail: [imy@imy.se](mailto:imy@imy.se)

**Updates to our Privacy Notice:**

We may need to update our Privacy Notice. We will communicate any material changes to the Privacy Notice on <https://career.hm.com>.

## **RECRUITMENT**

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### **Why do we process your personal data?**

The main reasons for using your personal details are to recruit, both internally and externally, suitable candidates and to manage candidate pipeline. Your personal data will be used for the below purposes:

- To identify, evaluate and communicate with presumptive and prospective candidates;
- To screen, select and assess candidates for a vacancy;
- To establish and maintain talent acquisition where job alerts may be pushed out;

When necessary, we may use an automated system, including profiling and/or assisted decision-making, to shortlist applicants. The source of the data we use in such automated process may include information you provided in your application, data collected during the ongoing application and from previous applications. We employ automated recruitment tool not only to expedite the recruitment process when there is a high volume of applications, but also to ensure a fair and objective assessment of your application. You have the right to obtain an explanation and challenge the decision reached by contacting email listed in this notice or contact your recruiter directly.

### **What types of data do we process?**

We will process the personal data being submitted to us either by yourself or by a third party. We will process the following categories when you submit your application to us:

- Contact information such as name, e-mail address, postal address and telephone number
- Date of birth
- Employment and education history
- Skills, certificates and all other information included in your CV
- References
- Documentation generated during recruitment process, such as interview notes and test results and/or answers
- Video, photo and audio

We do not request sensitive personal data, for example racial or ethnical origin, political views, religious or philosophical conviction, union membership, health or sexual orientation. Please refrain from including such information in your application unless it is required by law or necessary for H&M Company to comply with legal obligations.

### **What is the legal ground for processing your personal data?**

Candidate selection process along with contract negotiation we rely on fulfilment of contract. Optimization of recruitment process is based on our legitimate interest. Administration of talent pools, referral programs, processing of referee data, and job fairs and surveys are based on our legitimate interest. Sending employer branding material and job alerts (via H&M Career site) is based on your consent.

### **How long do we keep your data?**

We will keep your data for a maximum period of two years from when the data was last handled within our recruitment process.

## **SECURITY**

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### **Why do we use your personal data?**

Security measures, including physical and information security, are vital to protect our employees, customers, and our business. Therefore, your personal data may be used for the below purposes:

- To protect workplaces, facilities and equipment, and all information contained therein from incidents, accidents, and malicious/criminal attacks.
- To ensure online safety for our customers, users, visitors, assets and business against cyber-attack, fraud, misuse, and other malicious activities.
- To generate security analysis and reports on aggregated level.
- To assess, investigate, document, and report a crime or act of disloyal behavior based on a serious suspicion, such as breach of law, company policies fraudulent activities etc., for example through a digital forensic investigation.
- To ensure H&M's legal compliance and protect our position in the events of potential crime reporting & investigations.
- To establish, exercise and/or defend, current and/or future, legal claims, or disputes.

### **What type of data do we process?**

Where applicable, we may process the following categories:

- Contact information such as name, address, e-mail address and telephone number
- System logs linked to identifiers such as fob key, user ID and e-mail address
- Employment related information such as job role, department, and cost center
- IP address and device ID
- Data stored in/on company owned devices/(cloud) servers, including e-mails or other messages sent or received through your work email account and all digital collaboration linked to it.
- Video footage captured by Surveillance cameras in our stores, warehouses, and offices.
- Incident and accident logs  
Such logs may contain data such as injuries sustained, claimant identity and contact information, and other details about the incident including (suspected) criminal activity

### **What is the legal ground for processing your personal data?**

Unless there is a specific legal obligation, the processing of your personal data is based on our legitimate interest for us to ensure an appropriate level of physical, personal, and information security.

### **How long do we keep your data?**

We will keep your personal data for the duration necessary to fulfill the various security purposes listed above. Notably, camera surveillance data is kept for 30 days unless there is a compelling or obligatory reason to retain it longer. System logs linked to your access credentials are kept for up to 24 months after deactivation. Where Payment Card Industry Standard (PCI) compliance is applicable, we will save your data for up to 15 months. Personal data included in security audit reports are saved for 5 years.

# OPERATIONAL & ORGANISATIONAL DEVELOPMENT

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## **Why do we process your personal data?**

H&M runs various programs and initiatives for different purposes, aiming at developing our internal operational and organisational capabilities. In this context operational and organisational capability development mean the development, improvement and enhancement of our company brands, employer branding, company values and culture, health and safety at work and general well-being. Being a high performing organization and an employer of choice is a paramount objective for H&M as a business, securing long term growth in a competitive industry.

On a regular basis or occasionally you may be asked and encouraged to contribute to these objectives, either by participation in surveys or polls or through performance at certain events, campaigns, conferences, or workshops. Your engagement may sometimes require the collection and use of your personal data, which may vary from time to time and situation:

- To improve candidate relations by conducting activities such as surveys, ratings, etc.
- To remain a competitive employer through initiatives such as employer branding, Inclusiveness & Diversity, etc.

## **What type of data do we process?**

What type of data we need to collect from you and to process may vary due to the scope, context objective, venue or occasion etc. However, we will only ask you to provide your personal data that are necessary for the particular purpose. In no event we will ask for sensitive personal data that relate to your ethnical origin, political opinions, religious or philosophical belief, sexual orientation, trade union membership or health data.

Examples of personal data we may obtain from you are:

- Contact information i.e. name and e-mail address, e.g. when you are participating in surveys and polls;
- Photo, video and audio recordings, e.g. when you act as an ambassador for your function/role;
- Work related information such as role/function, department, geographical location, compensation package;
- Quotes and statements made by you

## **What is the legal ground for processing your personal data?**

Any collection and processing of employee personal data, fitting with the objectives of developing our operational and organization capabilities, is justified on our legitimate interest as a company, business and employer.

## **How long do we keep your data?**

We will keep your personal data no more than necessary for the purposes the personal data was collected.

**Updated November 2024**