



# Data Protection Policy - Job Applicants

***Uppfært: 9. september 2025***

Ölgerðin Egill Skallagrímsson hf. ("Ölgerðin") and its subsidiaries, including Danól ehf. ("Danól,") have dedicated themselves to ensuring the reliability, confidentiality and security of the personal information of applicants for jobs at the companies. This Data Protection Policy is intended to inform applicants what personal information the companies process about applicants and in what manner.

This Data Protection Policy covers the personal information of anyone who applies for a position at either Ölgerðin and/or Danól. In those cases when you apply for a job at Ölgerðin, Ölgerðin acts as a so-called controller within the meaning of the Data Protection Act. In those cases when you apply for a job at Danól, Ölgerðin and Danól appear as so-called joint controllers, since Danól outsources a large part of its activities to Ölgerðin. In this Policy, for the sake of simplicity reference is often only made to Ölgerðin, even if the processing is related to an application for a job at Danól. This Policy, moreover, refers to applicants as "**you**" and the companies as "**us**."

## **1. Purpose**

Ölgerðin and Danól seek to fulfil data protection legislation in all respects. This Data Protection Policy is based on Act no. 90/2018 on the Protection of Personal Privacy and Processing of Personal Data ("**Data Protection Act.**")

Personal data under this Policy means any personally identified or personally identifiable information, i.e. information that can be traced directly or indirectly back to a particular individual. Data that are not personally identifiable are not deemed to be personal data.

## **2. Personal information processed**

We collect and preserve a range of information on applicants, and their processing and collection depends to some extent on the nature of the position applied for.

The following is the information that Ölgerðin and Danól mainly process about applicants:

- communications information, i.e. name, ID No., address, telephone number, and e-mail address;
- job applications;
- CV and information on education, training, and experience;
- information from references and recruitment agencies as the case may be; and

- information from employment interviews.

As well as the above, Ölgerðin and Danól may also collect and use other types of information provided to the company by you during the application process.

As a general principle, Ölgerðin and Danól collect personal information directly from you. In cases where personal data is obtained from a third party, the company will endeavour to inform you of such action.

In the event that you are offered a job with the company, the company may request a copy of, or information from, your criminal record, a copy of your driver's license, forklift test, and your diploma in relation to specific jobs, before concluding an employment contract.

### **3. Why do we collect personal information and on what basis?**

We collect personal information on applicants mostly for the purpose of evaluating the competence of the applicant to undertake the position in question.

The personal information about you that we process is processed in connection with your application for employment with the company, i.e. on the basis of your request to enter into a contract with the company.

In limited cases, we may obtain consent from you to work with more specified information, in relation to the retention period of the information you provide us or regarding the delivery of your application to Ölgerðin's subsidiaries. In such cases, you are always entitled to withdraw your acceptance.

It should be noted that if you do not provide Ölgerðin and Danól with the requested information during the recruitment process, this may mean that the company cannot employ you.

### **4. Access to personal information and disclosure to third parties**

Access to information on applicants is limited to Ölgerðin's Human Resources Department, as well as the managers and overseers of the position applied for.

Ölgerðin may disclose personal information about applicants to persons providing references, or to recruitment agencies in connection with the recruitment process. It should be noted that Ölgerðin takes advantage of the assistance of processors in connection with IT services where your personal information may be preserved or made accessible due to such services. In those cases where the applicant needs to apply for a work or residence permit, Ölgerðin may share limited information with the Directorate of Immigration and Registers Iceland.

To the extent permitted or required based on relevant laws or regulations or in response to legal actions such as searches, subpoenas, or court orders, Ölgerðin may also find it necessary to share limited information about you with third parties.

Ölgerðin will not, however, disclose personal data outside of the European Economic Area, unless authorised to do so under the relevant data protection legislation.

### **5. How is the security of personal data guaranteed?**

Ölgerðin seeks to take the appropriate technological and organisational measures to protect your personal information. These measures are intended to protect personal data against unlawful destruction, against accidental loss or alteration, and against unauthorised access, copying, use, or disclosure.

Applications and other data relating to the application process that are preserved in electronic format are stored in Ölgerðin's computer system, which is access controlled, and hard-copy (paper) data is stored in locked storage.

### **6. Preservation of personal information**

Six months after the application deadline of for the position applied for has expired, or from the time that you sent in a general application, Ölgerðin will delete your personal information if you have not been hired. Ölgerðin may, however, request your approval to keep your information for longer.

In the event you are employed, Ölgerðin will transfer your personal information into the electronic employee file at the company that you applied to. Such processing is discussed in a separate policy issued by the company.

### **7. Amending and correcting personal data**

It is important that the personal data that Ölgerðin and Danól process is both correct and appropriate. During the application, it is important that you notify Ölgerðin or Danól of any changes that may occur as regards the personal information that you have provided to us.

Please direct all updates to the company's Human Resources Department.

### **8. Your rights regarding the personal information processed by the company**

You are entitled to have access to, and in certain cases obtain a copy of, your personal information processed by Ölgerðin or Danól as well as information on the processing methods used.

Under certain circumstances, you may also be authorised to request that your personal information be deleted or that its processing be limited. You are entitled to have your personal information corrected in the event that such information is incorrect.

In addition, you may be entitled to a copy of the information you have provided to Ölgerðin in computer format or that we send such information directly to a third party.

Your above rights, however, are not unequivocal. Thus, laws or regulations may authorise or oblige the company to reject your request to exercise the said rights.

#### **9. Enquiries from applicants and complaints to the Icelandic Data Protection Authority**

If you wish to take advantage of the rights described in this policy, or if you have any questions regarding this Data Protection Policy or the manner in which the companies process your personal information, please contact the company's Data Protection Officer (DPO) or Human Resources Manager.

If you are dissatisfied with the company's processing of your personal information, you can send a complaint to the Icelandic Data Protection Authority ([www.personuvernd.is](http://www.personuvernd.is)).

#### **10. Contact information**

We have appointed Ölgerðin's DPO to supervise the follow-up of this Data Protection Policy. The DPO can be contacted by sending an email to [personuvernd@olgerdin.is].

The company's contact information:

Ölgerðin Egill Skallagrímsson hf.

Grjótháls 7-11

110 Reykjavík

#### **11. Revision**

Ölgerðin and Danól may, from time to time, amend this Data Protection Policy in line with changes to the relevant legislation and regulations or in light of changes to how the companies handle personal data. An updated version of the Policy will be published on Ölgerðin and Danól's application website or presented in another verifiable manner.

All changes that may be made to the policy shall enter into effect once the updated version has been published on Ölgerðin and Danól's application website.