

Recruitment Privacy Notice

Effective date September 1st 2025. September 1st 2025.

The Controller of your personal data at If is **If P&C Insurance Holding Ltd (publ)** (“If”, “we”, “us”). If’s subsidiaries and affiliates may process your personal data in their capacity as data controllers. The subsidiary or affiliate specified in the job posting serves as the data controller. We are committed to respecting your privacy and protecting your personal data, which is any information that can identify you as an individual person.

This Recruitment Privacy Notice describes how we handle and protect your personal data relating to If’s recruiting processes. This Privacy Notice only applies to the personal data of job applicants, potential candidates for employment, trainees and interns. It does not apply to our employees, contractors or clients, or other personal data that If collects for other purposes.

Please note that if you are also a customer of If you can read about the processing of your data when using our services on If’s Privacy Notice on our website.

As used in this Privacy Notice, “personal data” means information that identifies job applicants and potential candidates for employment, trainees and interns, either submitted as part of the online application and/or through alternative channels (e.g., via professional recruiting firms). We will process your personal data in accordance with this Privacy Notice, unless such processing conflicts with the requirements of applicable law, in which case, applicable law will prevail.

By submitting your personal data 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 within the Europeans Union and/or EEA-countries, for the purposes and in the manner specified in this Privacy Notice.
- You are not required to provide any requested information to us, but failing to do so may result in 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.
- This Privacy Notice does not form part of any contract of employment offered to candidates hired by If.

1. Contact details

If you have any questions concerning our handling of your personal information you may contact the responsible department at the country where you are applying:

konkurss@if.ee	Estonia
personals@if.lv	Latvia
personalas@if.lt	Lithuania

If you have any questions concerning our handling of your personal data, you may also contact our DPO and the team DPO@if.ee, DPO@if.lv or DPO@if.lt.

2. Your rights and how to exercise them

We take reasonable steps that are designed to keep your personal data accurate, complete, and up to date for the purposes for which it is collected and used. We also have implemented measures that are

designed to ensure that our processing of your personal data complies with this Privacy Notice and applicable law.

We want to be transparent regarding the information we hold about you and we want to make sure it is accurately updated. As an applicant, you have certain rights which you can request to be exercised over your data. If you would like to exercise any of your rights listed below, you can always contact our Data Protection Officer or our local representatives via the contact information above in Section 1.

Some of the rights however cannot be exercised by the data subject because we may be under a legal obligation to continue to process the data, for example, in an instance where legal proceedings have been initiated.

1) **Right of access**

You have the right to be informed about how we process your personal data, and You have the right to request a copy of your personal data.

2) **Right to rectification**

You have the right to ask us to supplement, complete personal data you think is missing and correct or delete personal data that is inaccurate.

1. **Right to erasure ('right to be forgotten')**

You have the right to request us to erase your personal data if one of the following requirements applies:

- The data is no longer needed for its original purpose, and no lawful purpose exists for us to continue to process it, e.g. you had applied for a position within the If group, but did not start employment in that position;
- You withdraw consent on which the processing is based, and no other lawful ground for us to continue to process it exists, e.g. you had given consent to process your data for recruitment purposes, but no longer agree to this processing;
- You exercise the right to object, and we have no overriding grounds for continuing the processing, e.g. when you are no longer interested in being employed at If, you can request to delete your personal contact information and other information we are not obliged to store by law;
- Your personal data has been processed unlawfully, e.g. we have stored your personal data for longer than necessary;
- We have a legal obligation to erase your data, e.g. local archiving legislation puts this obligation on us.

There may also be situations where we cannot delete your personal data, for example when the personal data is still necessary to fulfil the purpose for which the data was collected, or when our interest in processing the personal data outweighs your interest in having it deleted, e.g. archiving and/or employment laws obligate us to store certain documents and other information about you for a certain amount of time.

Therefore, keep in mind that some of your personal information may be excluded from this right. In such cases, we will stop processing and storing your personal data for any other purpose than for the purpose for which we need to process and store the personal data.

3) **Right to restriction of processing**

You have the right to request that we restrict the processing of your personal data. This right applies, for example, in the following situations:

- The accuracy of the data is contested by you, so for the period required for us to verify the accuracy of the personal data, processing will be restricted;
- The processing is unlawful, and you request that we restrict the processing, instead of erasing the data;
- We no longer need your data for their original purpose, but there is a need to keep the data for the exercise of a legal right;
- You have objected to processing of your data and the objection is being processed to determine whether our legitimate interest outweighs yours.

4) Right to data portability

You have right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format. Upon your request, the personal data can be transmitted directly to another organization, where technically feasible.

6) Right to object to processing

You have the right to object to processing of your personal data in certain circumstances. For instance, in cases where we have not immediately selected a candidate for a certain position and we would like to offer a person for a different open position later, which is our legitimate interest, you may object to such processing. However, this right only applies in certain circumstances and not when we, as an employer, are obliged, for example, to save information about your application, to ensure we have records that we treated your application in a fair and non-biased manner.

7) Right to withdraw consent

If the processing of your personal data is based on consent, you have the right to withdraw your consent for that specific processing purpose at any time. To withdraw your consent, please contact the unit you have given the consent to. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the specific purpose or purposes you originally consented to, unless we have a legitimate basis for doing so. Please note that withdrawing your consent may result in certain limitations. For example, if you applied for a new position within the If group that required a qualification test, but did not start working in that position, and you later apply for another position requiring the same test, you will need to retake the test.

8) Right to lodge a complaint with a supervisory authority

If you believe that your personal data has been processed in breach of legislation, we advise you to contact the responsible department in the country where you are applying by using the email addresses listed in Section 1.

If you are not satisfied with this solution, you can always lodge a complaint with the Data Protection Officer or HR department via the contact information above in Section 1.

To help protect your privacy and security, we will take reasonable steps to verify your identity before granting you access to your personal data. We will make reasonable attempts to promptly investigate, comply with, or otherwise respond to your requests as may be required by applicable law. Depending upon the circumstances and the request, we may not be permitted to provide access to personal data or otherwise fully comply with your request; for example, where producing your information may reveal the identity of someone else. We reserve the right to charge an appropriate fee for complying with your request where allowed by applicable law. We do not make recruiting or hiring decisions based solely on automated decision-making.

3. How is your personal data collected?

Depending on the situation and the role you have applied for, your personal data are obtained from a variety of sources, including:

- 1) directly from you;
- 2) a third-party recruitment service provider;
- 3) former employers (only based on your consent);
- 4) publicly available online and on social media, e.g. LinkedIn, Google;
- 5) a government agency or official database.

4. The personal data we collect about you

The types of personal data that we request from you or collect from third persons incl. public sources and the ways that we process it are determined by the requirements of the country in which the position is located, and not the country in which you reside. Should you apply to more than one location or should the role to which you apply be available in more than one country, the types of personal data we request from you and the ways that we process it are determined by the requirements of all the countries in which the position is located.

Sensitive personal data is a subset of personal data and includes ethnicity, health, trade union membership, philosophical beliefs, sexual orientation, as well as other categories as prescribed by law. We do not seek to obtain and will not collect such data about a candidate.

Categories of personal data	Examples
Contact and identifying information	Name, surname, address, email, telephone number, birth date, personal ID code (if a position is offered), gender, residence permit information (including nationality).
Education and skills	Information included in a CV (in paper, digital, video or other format) and job application/motivational letter, educational background, skills and experience, professional certifications, memberships and affiliations, LinkedIn.
Previous employment information	Previous employer details and employment history, references.
Background information <i>(Depending on the role to which the candidate applies, the information gathered for purpose of background checks may differ. This information is collected about final candidate only.)</i>	For employees who are subject to Fit and Proper requirements and employees directly involved in insurance distribution : Pre-employment criminal records (incl. Information about any criminal punishments; punishments for misdemeanour or other convictions; any other involvements to the criminal procedures; information about imposition of international or national sanctions, prohibitions on business, occupational bans, prohibitions to engage in enterprise); information about financial irregularities (incl. information about any previous or pending bankruptcy, insolvency, compulsory liquidation or other similar procedures; information about inclusion in a list of unreliable debtors or about any negative record on a list established by a recognised credit bureau or application of enforcement measure for any such debt) and other information available in public sources.
	For candidates to other positions , depending on the country and legal limitations: information about financial irregularities (incl. information about any previous or pending bankruptcy, insolvency, compulsory liquidation or other similar procedures; information about inclusion in a list

	of unreliable debtors or about any negative record on a list established by a recognised credit bureau or application of enforcement measure for any such debt), information about imposition of international or national sanctions and general background based on information available in public sources.
Assessments	Memoranda and assessments performed either by If HR, hiring manager or external recruiters.
Testing information	Information obtained during personality tests or other tests if such tests are conducted.

5. The purposes for the processing

1) General purposes

We collect and process your personal data for recruitment management purposes, including:

- To communicate with you;
- To evaluate your suitability for the position;
- To validate the information and confirmations provided by you;
- To identify and evaluate candidates for potential employment, as well as for future roles that may become available;
- For recordkeeping in relation to recruiting and hiring;
- In cases of hiring a candidate, their personal data is needed to prepare the employment documentation;
- To ensure compliance with legal requirements, including diversity and inclusion requirements and practices;
- To determine fit for the role and to comply with applicable laws;
- To protect our legal rights to the extent authorized or permitted by law.

We may also analyse your personal data or aggregated/pseudonymized data to improve our recruitment and hiring process and augment our ability to attract successful candidates.

We process your personal data for the purposes described above: when we have your consent to do so; when necessary for entering into an employment contract with you; when necessary for us to comply with a legal obligation; or when necessary for the purposes of our legitimate interests as an employer operating globally.

We may desire to retain your personal data to consider you for future employment opportunities. In such an event, we will seek your consent, either prior to or after you formally apply for a job opportunity.

2) Insurance sector requirements

There are various obligations that insurers must comply with, and they can be mandated in local, European Union, and other legislations where If is present. As an insurance company, we must maintain a register of those employees:

- who are directly involved in insurance distribution or
- are subject to the "Fit and proper" requirements.

The register may contain the following information: Employee's name, surname, position. As an insurance company we must ensure and be able to prove that persons on these positions are continuously compliant with applicable legal requirements. Therefore, we are obliged to keep and make available for authorities, as required by the law, information about education, reputation, criminal records, background check, credit score and financial irregularities, and sanctions, as well as information about affiliations, holdings of capital, and positions held elsewhere and, where applicable- the start/end dates of the employee's insurance distribution obligations.

Personal data for the mentioned purposes is collected both from the data subject and public registers.

6. Legal basis for processing candidate personal data

The legal grounds on which we rely on for using your personal information, depend on the nature of- and on the purpose of the specific use. We rely on the following legal grounds to process your personal data:

- Processing is necessary to execute the recruitment process and perform the evaluation and interview process between the recruiter and you, e.g. your personal identification and communication information to contact you.
- You have given consent to the processing of your personal data for a specific purpose, e.g. you have agreed that your personal email address is used to conduct an interview via remote tools.
- Processing is necessary for compliance with a legal obligation to which the employer is subject, e.g. insurance industry specific legislation.
- Processing is necessary for the employer's legitimate interests, e.g. preventing fraud or offering you a position in the future.
- Processing is necessary for the establishment, exercise or defence of legal claims.

Legal basis for processing Purpose for use of Personal Information	Necessary to execute the recruitment and evaluation process	Necessary for the employer's legitimate interests	Needed to comply with legal obligations	You have provided consent <i>(where consent is required by applicable law)</i>	Necessary for establishment, exercise or defence of legal claims
To communicate with you	✓	✓	✓		
To evaluate your suitability for the position	✓	✓	✓	✓	
To identify and evaluate candidates for potential employment	✓	✓		✓	
To keep records related to recruiting and hiring	✓	✓	✓		
To prepare documentation	✓	✓			
To determine fit for the role	✓	✓			
To comply with applicable laws and regulations	✓	✓	✓		
To establish and defend legal rights	✓	✓	✓		✓

If processes your data only to the extent that is necessary to assess your suitability for a particular position within If and stores your data only for as long as necessary to ensure evidence of the transparency of the recruitment process. Unless you have objected, in accordance with section 2.6, we may process your data for the purposes of possible future recruitment.

7. How do we process your data?

All processing of your personal data is conducted only in systems verified and approved by If. Access to the data is limited only to those persons within If who need to access the data (e.g. HR representatives and hiring managers) and they have been instructed on how candidates' personal data should be handled.

During the recruitment process, hiring managers and HR representatives can make memoranda, for example in the form of assessments of candidates, as well as collect information from reference persons.

We may hold a video interview with you, using Microsoft Teams or a similar tool, however, we do not record such interviews.

We always take appropriate technical, physical, legal, and organisational measures to protect your personal data.

8. Categories of recipients of the personal data

As an employer and insurance company, If has legal obligations to disclose personal data also outside If. For this reason, we may disclose certain personal data of yours, for example, to the state revenue service and supervisory authorities. In addition, data is disclosed to third parties within Sampo Group for statutory statistics and reporting.

9. Data transfers to third parties

We keep your information strictly confidential. We do not sell, rent, distribute, or otherwise make your personal data available to any third party for purposes unrelated to recruitment. However, we may need to share your personal information with third parties, for example, recruiters (only in cases when we have received your information from them), or IT service providers providing services that allow us to administer your job application.

We use third party service providers to provide a recruiting software system, e.g. Workday, Microsoft. We also share your personal data with other third-party service providers that may assist us in recruiting talent, administering and evaluating pre-employment screening and testing, and improving our recruiting practices.

We maintain processes designed to ensure that any processing of personal data by third party service providers is consistent with this Privacy Notice and protects the confidentiality, availability, and integrity of your personal data. Where required by law, we put in place legal mechanisms designed to ensure adequate data protection of your personal data in a third country.

In addition, we may disclose or transfer your personal data in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

10. Security

We have implemented generally accepted standards of technical and operational security to protect personal data from loss, misuse, alteration, or destruction. Only specific personnel of If and of our third-party service providers are provided access to personal data, and these employees and third-party service providers are required to treat this information as confidential.

11. Retention periods for personal data

	Document/ information type	Retention time		
		Latvia	Lithuania	Estonia

If recruitment results in recruitment	Data retention according to employee privacy notice	Personal Data LV	Personal Data LT	Personal Data EE
If recruitment does not result in employment	General recruitment information and Background check information for all roles	1 year after the closure of the recruitment process	1 year after the closure of the recruitment process	1 year after the closure of the recruitment process

If you accept an offer of employment by us, any relevant personal data collected during your pre-employment period will become part of your personnel records and will be retained in accordance with specific country requirements. If we do not employ you, we may nevertheless continue to retain and use your personal data for a period of time as indicated above.

In certain cases, we may retain your personal data for a longer period where necessary to comply with legal obligations, resolve disputes, or protect our legitimate interests. In such cases we will ensure appropriate safeguards are in place.

12. Changes to the privacy notice

We keep our privacy notice under regular review. Changes to the notice will be updated on this site or communicated directly to you.

