



Privacy Policy

Date	Name	Role	Change	Version
Tue Apr 07 2026	Eskild Cold	Co-founder	Approved	V3.0
Tue Apr 07 2026	Eskild Cold	Co-founder	Approved	V2.0
Mon Sep 01 2025	Eskild Cold	Co-founder	Approved	V1.0

General

This Privacy Policy describes Fairec's treatment of your personal data. We only collect and process personal data about you when we need to, and for a specific purpose - which change depending on your relationship with us.

“We” are (the company responsible for processing your personal data):

- Fairec ApS, Company reg. no.: 45143562
- Store Kongensgade 130, 1264 København K, Denmark

You can always reach us at: E-mail: info@fairec.io

Fairec ApS (hereafter Fairec, we or us) is the data controller for the processing of your personal data described in this policy. This means we have a responsibility to keep your personal data safe, to only use it for legal purposes, and to inform you about it – so that you can exercise your rights.

1. What this policy covers

At Fairec, we respect your privacy and inform you of how your personal data is processed by us. Here you will find information about which data Fairec processes,



for what purposes, the legal basis for the processing, for how long the information is processed, and your rights under GDPR (General Data Protection Regulation (EU) 2016/679). This privacy policy governs the manner in which Fairec collects, uses, maintains, and discloses information about you. This privacy policy also applies to the website (www.fairec.io) and all products and services offered by Fairec.

2. Legal basis

For us to be able to process your personal data, we must have a legal basis for each personal data processing. There are six available legal bases under the GDPR and there are four that are relevant to us:

- **Consent** – You have given us permission to process your personal data for a specific purpose, being fully informed about what data we process, how, and why. You can withdraw your consent at any time, after which we will stop any process for this purpose, without a negative impact on any contract with us.
- **Agreement** – You have entered into an agreement with us or have asked us to do so. We will manage your personal data to fulfill the terms and conditions of the agreement.
- **Legal obligation** – We, as a company, must process your personal data to comply with legislation.
- **Legitimate interest** – When we have a legitimate interest in processing your data, the purpose is similar to that which it was collected, and while there is little risk of the processing infringing on your privacy, we may rely on the legal basis of legitimate interest.

3. Your rights

3.1 Right to access

You have the right to know what personal data we process about you and for what purpose. This is easily exercised through a so-called Data Subject Access Request (DSAR). Find our contact details below to start the process. To make sure that no one except you



gets access to your data for this purpose, we will first ask you to identify yourself. This can be done more than once but be aware that misuse of this right and excessive amounts of requests will result in a small charge to cover our administrative expenses.

3.2 Right to rectification

You have the right to have inaccurate personal data about you rectified. You can also ask us to supplement any incomplete personal data.

3.3 Right to deletion

You can request that we delete the personal data we process about you if any of the following applies:

- If the personal data were obtained and processed with the legal basis of your consent and you want to revoke your consent.
- Personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
- If deletion is required to fulfill a legal obligation.
- If the personal data has been processed illegally.
- If you request to delete your personal data, we will make an effort to also inform those we may have provided/transferred the personal data to about the request.

3.4 Right to restriction

You have the right to request that our processing of your personal data is restricted. Restriction means that the data information is marked so that in the future it may only be processed for certain limited purposes. We may also restrict the processing while awaiting a decision on deletion.

3.5 Right to data portability

You have the right to obtain your personal data in a structured and machine-readable format. You also have the right to get your personal data transferred to another data controller, where technically feasible. This right only applies to personal data which you yourself have provided us, and when the data has been processed on the legal basis of consent or contract.

4. Applicants



When you apply for a job at a company other than us, which uses our Service, that company is generally considered the data controller for personal data processing. They are responsible to inform you about this, please refer to their privacy policy.

When you apply for a job at Fairec or at another company where we decide on the process (what questions to ask and why), we are the data controller of the personal data processing as described below.

4.1 Why do we keep your personal data?

- Manage your application for job vacancies.
- Offer you jobs related to your wishes and/or your competencies, as well as to provide you with personalized offers, information or invitations that we consider to be of interest to you.
- Continuous communication about the jobs you applied for.
- Other statistical purposes, e.g. to maintain and develop the quality of our services.
- For development and research purposes.
- For quality control purposes

4.2 What personal data may we collect and process?

- Name
- E-mail address.
- Mobile phone number.
- Competences and previous experience through your CV, through interviews and based on the knowledge and experience you inform us of.
- Test results, if you performed tests as part of the recruitment process.
- Photography, if you included one in your CV.



- Transcribed answers from the interview with Fairec platform.
- Audio and/or video recordings from the interview with Fairec platform
- Other personal data you choose to share with us in your CV and possibly other uploaded documents.*

*We advise you not to provide us with sensitive personal information regarding ethnic origin; political opinions; religious or philosophical beliefs; membership of trade union, information on health, and information on gender affiliation. We, therefore, reserve the right, without your consent, to delete all the above information, as well as personal information relating to others than yourself.

4.3 How we collect your personal data

From you:

- We received the information from you when you applied for a job (either directly or through a third-party, with consent)

By us:

- We have collected the data when you have e-mailed, phoned us, or provided contact information when you asked us to contact you.
- We have collected the data automatically during your visits to our website by saving interesting job ads or chatting with us.

From third party:

- We have collected the data from other sources – e.g. reference persons, our customers, or job sites such as LinkedIn.

4.4 What legal basis do we base our processing of your personal data on?

When you apply for a job with us, we process your data based upon you wanting an employment contract with us (legal basis: agreement, under GDPR). Some processing is only done after your explicit consent, for example, photographs when that is not strictly necessary to fill a position.



When we facilitate the screening process at another company through the Fairec platform, we are responsible for the processing and base it on our legitimate interest.

4.5 Whom we share your personal data with?

We share your personal data with sub-contractors (sub-processors) who perform services on our behalf (such as technical, administrative, market-related, or other services) when required for the purposes mentioned above. These suppliers may not use your personal data for their own purposes, which we have regulated in agreements with these suppliers.

- Your personal data may also be disclosed when required by law such as, for example, the Discrimination Act or to the Data Protection Authority.
- We use the following categories of sub-contractors (processors):
 - Storage, research, and development.
 - CRM-Software.
 - Back-office functionality.
 - Software development.

4.6 How long will we keep the data?

We will keep your personal data as long as we have your consent and we have a further use and purpose for the data. When your personal data is processed to protect our legitimate interest, we will keep the data for twelve (12) months due to the provisions of the Discrimination Act and possible appeals.

We do not keep your personal data for undefined purposes.

5. Employees

5.1 Why do we process your personal data?

When you become an employee of Fairec, you enter into an agreement with us as an employer. We are also required to process personal data about you to comply with several different types of legislation that we as an employer are subject to.

5.2 What personal data may we collect and process?

- Name.



- Address.
- Phone number.
- Personal identity number.
- E-mail address.
- Bank account number.
- Salary, pension and benefits.
- Employment history and time reporting.
- Medical history.
- Photographs.
- Allergies and sensitivity to foodstuff.
- Information related to your achievements such as annual follow-ups and completed courses.
- Please note that the above list is not exhaustive and other information may be considered

5.3 How we collect your personal data

From you:

- You have stated these yourself in the recruitment process and in connection with the start of your employment, as well as during your employment.

By us:

- The data has been generated associated with your employment. For example, data about your attendance, sick leave and vacation.

From third parties:



- The data has come from other sources such as authorities, third-party suppliers who provide services for us (salaries), and from reference persons and customers.

5.4 Who we share your personal data with

We share your personal data with third party providers that we use to perform services on our behalf (such as technical, administrative, market related, or other services) when required for the purpose of managing your employment. These third-party suppliers may not use your personal data for their own purposes, which we have regulated in agreements with these suppliers.

We use the following categories of sub-contractors (processors):

- Accounting services.
- Human resources platform.
- Employee benefits platform.

We share data within our company based on our legitimate interest and for administration purposes.

5.5 What legal basis do we base our processing of your personal data on?

As our employee, you have an employment contract. When you later end your employment, we must, according to Danish law, further process some of your personal data, for example to ensure you get the right pension (legal obligation). We may also keep some of your personal data based on your consent, to act as a reference for future employment elsewhere.

5.6 How long will we keep the data?

We will keep your personal data as long as it is needed to fulfill our obligations from your employment, to fulfill legal obligations, or as long as your consent is valid, based on the purpose and legal basis of the processing. We do not keep data just for the sake of keeping data.

6. Suppliers

6.1 Why do we process your personal data?



We may process personal data about you (as an employee of our supplier), to maintain our professional relationship and ensure continued services between our companies. This may apply to personal data concerning customer managers, support functions, service personnel, finance department or other key personnel.

6.2 What personal data may we collect and process?

- Name.
- Title.
- Phone number for work.
- Mail address to work.

6.3 How we collect your personal data

From you:

- Through emails and information by phone.

By us:

- We have found the data on your company's website.

From third party:

- We have received the data from your employer or colleague.

6.4 Who we share your personal data with

We share your personal data with sub-contractors (sub processors) who perform services on our behalf (such as administrative, market-related or other services) when required for the purposes mentioned above. These suppliers may not use your personal data for their own purposes, which we have regulated in agreements with these suppliers.

We use the following categories of sub-contractors (processors):

- Customer relationship management system.

6.5 What legal basis do we base our processing of your personal data on?

We have a legitimate interest based on a contract with the supplier in question.



6.6 How long will we keep the data?

As long as you are an important contact for us regarding our professional relationship, we will save your data. If it comes to our knowledge that your duties at your company have changed or that you no longer are employed, the data will be deleted.

7. Customers and potential customers

7.1 Why do we process your personal data?

- **Customer:** If you work at one of our customer companies, as a recruitment manager or as a contact person, we process certain personal data to be able to maintain our professional relationship and to provide the service to our customers as well as keep you updated by periodic emails. Further, to comply with legislation eg. Book-keeping Act and tax law.
- **Potential customers:** To be able to offer our services to companies that don't know about us or don't buy services from us, we collect contact information for key people at companies that we want to be able to contact and process for marketing purposes.
- **Demo participant:** If you sign up for a demo at our website, we will process your personal data in order to send you an invitation for the demo and also to reach out afterwards and ask you how your experience was. If we perform a demo on site with you, we will process your interview with the Fairec platform to demonstrate its functions.
- **Customer service requests:** Information you provide helps us respond to your customer service requests and support needs more efficiently.

7.2 What types of personal data may we collect and process?

- Name.



- Title (your workplace/where you work).
- Phone number for work.
- Mail address to work.
- IP address.
- Notes on our cooperation and / or dialogues.

7.3 How we collect your personal data

From you:

- When you signed the demo request form at our website.
- By visiting our website, signing up for and visiting any of our events.
- Subscribing to newsletters provided by Fairec.

By us:

- We will continuously update our CRM database. This means that we continuously work on having an updated and up-to-date database of current and correct contact information. This will be done through contacts with you by phone, e-mail, social media and in personal meetings, but also through external sources.
- Notes about our discussions and decisions.

From third party:

- From your employer or colleague.
- We have found the data on the Internet. It can be from the company's website or at job sites such as LinkedIn (publicly accessible sources).
- We have received your contact information from within the company
- We have purchased data from external sources.



7.4 Who we share your personal data with

We share your personal data with sub-contractors that we use to perform services on our behalf (such as technical, administrative, market-related or other services) when required for the purpose of managing our collaboration or for us to process you as a potential customer. These sub-contractors may not use your personal data for their own purposes, which we have regulated in agreements with these suppliers.

We use the following categories of sub-contractors:

- Storage, research and development
- CRM-Software.

7.5 What legal basis do we base our processing of your personal data on?

When we provide services as well as market ourselves to other companies and process personal data of their employees, we use legitimate interest as a legal basis. When you have signed up for a demo, we will process your personal data based upon your consent. For personal data processing to comply with legislation, eg. Book-keeping Act, we base the processing on legal obligations.

7.6 How long will we keep the data?

As long as you are an important contact for us regarding our professional relationship, we will save your data. If it comes to our knowledge that your duties at your company have changed or that you no longer are employed, the data will be deleted. For the processing based upon consent, we will process your personal data until you revoke your consent.

8. Other data subject

8.1 Why do we use your personal data?

8.1.1 References in an employment procedure

References are contacted in a recruitment process. For us to be able to contact the reference we need name and telephone number. In most cases, we also need to know the reference's position and relationship with the candidate (e.g. manager).

8.1.2 Emergency contacts / closest relative of employees

When someone is employed, we collect a so-called emergency contact, a close relative of the employee whom we can contact if it should happen during working hours or on commitment / travels that takes place within the framework of work.

8.1.3 Social media contacts



People who contact us on social media, by phone, website (including chat) and by email. If you as an individual have contacted us with questions of any kind, we may save your personal data in order to be able to contact you later on.

8.1.4 Partners and re-sellers

Collaborators, colleagues in our industry, people in professional networks, media contacts etc. We may save your contact information for future communication. We, as a company, must be able to save this information in order to effectively operate in the market and create relationships that promote our and other companies' growth.

8.1.5 Website visitor

To improve our website, we may use feedback you provide to improve our products and services

8.1.6 Survey participant

To run a promotion, contest, survey or other website feature or to send information you agreed to receive about topics we think will be of interest to you.

8.1.7 Newsletter / periodic email subscribers

If you decide to opt-in to our mailing list, you will receive emails that may include company news, updates, related products or service information, etc.

8.2 What personal data may we collect and process?

We may collect personal data from you in a variety of ways, including but not limited to, when you visit our site, register on the website, subscribe to the newsletter, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our website. We may collect, as appropriate, name, email address and phone number.

We may collect non personal identification information about visitors whenever they interact with our website. Non-personal identification information may include the browser name, the type of computer and technical information about visitors means of connection to our website, such as the operating system and the Internet service providers utilized and other similar information.

8.3 How did we collect these personal data?

From you:

- You have contacted us via Facebook, Messenger or Instagram when you commented on something or were asking us questions within these media.
- We have received personal data from you personally, by mail or business card.



- We have received personal data from you when asking us to be contacted or having contacted us via telephone, social media, website (including chat), info-mail or personal mailboxes.

By us:

- We have found the data in our own individual networks on e.g. LinkedIn.

From third party:

- We have received personal data from your employer or colleague.
- We have received personal data from job seekers for reference purposes.
- Someone named you as an emergency contact.

8.4 Who we share your personal data with

We distinguish between people who are in contact with us as a private person and people who are in contact with us as a representative from another company. Personal data for private persons, we are more restrictive with and generally don't share these data with anyone external. When it comes to personal data for professionals, we are not as restrictive, as sharing contacts within the professional network promotes business and corporate growth. We have the opinion that personal data regarding representatives from a company isn't as sensitive to privacy as personal data relating to a private person.

We use sub-contractors that perform services on our behalf (such as technical, administrative, market-related or other services) when required for the purpose of managing contacts with other stakeholders. These sub-contractors may not use your personal data for their own purposes, which we have regulated in agreements with these suppliers.

We use the following categories of sub-contractors:

- Storage, research and development
- CRM-Software.
- Survey platform.
- Social media platforms.



- Backoffice functionality.

We share data within Fairec, based on our legitimate interest and for administration purposes.

8.5 What legal basis do we base our processing of your personal data on?

The legal basis for processing personal data for this group may vary depending on in what respect our contact has arisen. In most cases, we will use legitimate interest as a legal basis. If we see that the individual whose personal data we processed ends up in one of the other interest groups, the legal basis that is applicable to that group will apply.

If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or you may contact us via our website.

8.6 How long will we keep the data?

8.6.1 References in a recruitment process (internally)

The references' contact details will be saved solely regarding the candidate who has been hired. We save the data and the reference protocol together with the candidate's other documents for 24 months due to the provisions of the Discrimination Act and possible appeals.

8.6.2 Emergency contacts / closest relatives of employees

Saved as long as someone is employed. The employee is responsible for ensuring that the data is correct and updated.

8.6.3 Social media contacts

Personal data is processed as long as the data is needed to enable and maintain communication.

8.6.4 Partners and re-sellers

During the process of establishing a professional relationship and contact in marketing purposes we will keep the data as long as we maintain a legitimate interest.

8.6.5 Website visitor

We process cookies according to our separate cookie policy. Apart from cookies that are needed for the website to run and any setting you have yourself requested, we only collect data via cookies after and based on your consent. Further processing might be based on other legal bases according to its purpose and as otherwise described in this policy.

8.6.6 Survey participant



We occasionally conduct surveys via our newsletter and other communication with you. This is based on your consent. The personal data is saved and processed for as long as we have your consent, or at most for as long as we need the data for the purpose of the survey.

8.6.7 Newsletter / periodic email subscribers

Until you decide to opt-out of our mailing list. In each email there is information about how to opt-out.

Our contact details

If you would like to get in touch with us regarding our processing of your personal data, you can send an e-mail to info@fairec.io. At this address you can also:

Make a DSAR (Data Subject Access Request, for information of all personal data processing on your person), as well as request modification or deletion of your personal data;

Submit comments or suggestions regarding our Privacy Policy.

Or, if you would rather get in touch with us by post:

Fairec ApS
Company reg. no.: 45143562
Store Kongensgade 130
1264, København K