This guide is a compilation of recommendations and instructions for GDPR-compliant settings in ReachMee. It's intended for those with the highest level of access to the system.

Last updated 22/05/18

1

1. GDPR, recruitment and ReachMee's role as data processor 2 1.1 How GDPR affects your recruitment in ReachMee 2 1.2 ReachMee versions 8 and 9 3 1.3 Recommended basic settings for review 4 1.4 Other recommended settings 4 1.5 Organisational tree 4
1.6 Roles and permissions
1.6 Cleaning routines
2 Instructions for changing settings 6
2.1 Organisational tree
The organisational tree
Add a unit
Create a sub-unit9
Existing unit
Modify an existing structure in the organisational tree and retain its statistics
2.2 Roles and permissions11
Assigning roles
Creating a new user12
Finding an existing user in ReachMee13
Changing or adding a role or roles
Additional restrictions for individual projects
2.3 Cleaning routines
Create cleaning policies for projects
3. Support and assistance with GDPR-compliant settings263.1 Support263.2 Personal data inventory template26

1. GDPR, recruitment and ReachMee's role as data processor

As system provider, ReachMee performs the role of **data processor**. This basically means we ensure you have the right system support to be able to carry out GDPR-compliant recruitment. Your company is then responsible as **data controller** for ensuring that your internal routines and working practices comply with GDPR. In other words, we can provide guidance on how to use ReachMee and information about how to implement GDPR-compliant settings, but it's up to you to ensure that you comply with GDPR when processing candidates' details for the purposes of recruitment.

We cannot offer guidance on how you should:

- Set up your internal processes
- Keep a record of the personal data you process
- Interpret legal text
- Document procedures

In cases where we are unable to provide support or guidance, it is best to contact either your corporate lawyer or another advisory body, such as the Swedish Data Inspection Authority. You can read all about GDPR on the Data Inspection Authority's website.

Remember that GDPR comes into effect on 25 May 2018 and that, since there is no further period of deferral, it must be adhered to from day one.

1.1 How GDPR affects your recruitment in ReachMee

To ensure GDPR compliance when processing personal data, we at ReachMee recommend that companies review and implement a number of settings. These settings are linked to the basic principles for processing personal data and to a number of paragraphs and provisions of the GDPR which concern, for example:

- 1. Data minimisation
 - The personal data you process should be concise and limited to those details which are relevant.
- 2. Inbuilt data protection
 - There should be procedures to safeguard candidates' personal integrity; for example, by restricting access
- 3. Information for candidates and valid consent agreements
 - When sending in their applications, candidates should first be informed which personal details you are requesting and how these are to be stored and processed, and then voluntarily agree to them being processed

- 4. The rights of the candidate
 - To be informed about how their personal data is to be used
 - To have their details deleted
 - To be able to make changes to the data stored
 - To require an extract from the register in which data has been stored
 - To be able to withdraw consent and ultimately therefore have data deleted

The above points are based on the following principles for processing personal data in accordance with GDPR:

- Lawfulness, fairness and transparency: You must be able to show that your processing of personal data is GDPR-compliant
- **Purpose limitation and data minimisation:** Only ask for and process limited amounts of personal data for which there is a clear purpose
- **Storage limitation and integrity:** You may not store identifiable data for a period longer than required to fulfil the purpose of its collection

We recommend that you review a number of basic settings. Apart from defining the required structure, these ensure, for example, basic checking of permissions and, more specifically, which users can review and edit data, as well as safeguarding of information and consent requirements.

Other settings are linked to making further adjustments and customising individual recruitment projects.

Apart from the previously mentioned information and consent requirements, the rights of candidates cannot be fully accounted for via system settings. Safeguarding candidates' rights is about your internal processes and how you handle requests made by candidates.

1.2 ReachMee versions 8 and 9

Please note that this guide covers the recommended settings for ReachMee version 9. Given that we will not be implementing GDPR functionality in version 8, future system enhancements will apply only to version 9. Since version 8 does not currently include all the functionality we have implemented to meet the requirements of GDPR, we invite all organisations still running version 8 to begin the task of switching to the current version, version 9, as soon as possible.

1.3 Recommended basic settings for review

We recommend that all organisations review their settings relating to:

- **Organisational structure**. Limit the spread of data by establishing structures for the organisation and its departments. Employees with certain roles linked to specific departments or units will have access only to recruitment projects belonging to that department.
- Access control. Review permissions for different users and roles so that, for example, managers responsible for recruitment have access to only those recruitment projects in which they are involved rather than the entire candidate bank.
- Cleaning. Establish routines for erasing candidate data.
- **Document formats.** Documents which candidates upload may contain personal information and should therefore be in a format which can be viewed without having to be downloaded.
- **Review your candidate bank**. Ahead of GDPR, you need to go through your entire candidate bank and erase outdated application documents.
- Information for candidates and consent to processing. Candidates should receive information about and actively agree to your processing of their personal data as part of the recruitment process. Information and consent texts need to be customised according to each individual organisation and directly linked to the details you are requesting, registering and processing.

1.4 Other recommended settings

- **Participants' access rights to particular projects.** It is possible to invite users as participants to various recruitment projects and in each project decide which process folders they have access to and which other permissions they have for the purposes of the project in question.
- The Candidate Display function for sharing candidate data securely. With the advent of GDPR, we recommend that clients do not save candidate details outside of ReachMee to share internally via email or the like. With the Candidate Display add-on, it is possible to invite external users without their own ReachMee login via a traceable link which becomes inactive after a set period of time.

1.5 Organisational tree

The organisational tree represents how your company is structured. By identifying recruitment projects with departments and sub-departments, they can be linked to limited sections of the company.

The tree is an effective tool for building a basic structure in order to:

- Assign multiple roles to individual users, allocating them separate permissions for different parts of the organisation.
- Restrict managers responsible for recruitment to being able to see only candidates who have applied for jobs in their specific department.
- Block regions or countries from being able to see each other's data; for example, where recruitment is taking place in both Sweden and Norway but with different recruitment teams which should not be able to see each other's candidates.

Ahead of GDPR it would be a good time to review how your organisational tree is structured and ensure that it accurately represents the organisation. Also remember to make an inventory of how users are currently connected and which permissions they have.

1.6 Roles and permissions

By assigning users a role, it is possible to limit their permissions in ReachMee.

Making use of the organisational tree, you can choose which role (and therefore permissions) individual users should have for specific parts of the organisation. Linking roles to the organisation structure is therefore an effective way of limiting access to candidates' personal data.

Companies should review their users in ReachMee and check which permissions they currently have. Users should be deactivated if no longer current and any which remain must be linked to new user roles and units in the organisational tree.

There are also a number of standard permissions that are assigned to the user that owns a project. For example, the owner of a project can add participants and control permissions within their project, copy in and add candidates manually, upload documents, edit and export candidate information and see whether the candidate is in another project as well as events that affect the candidate in another project.

If you have specific requirements regarding the project owner's permissions, contact support to let them know which of these permissions you would like to switch off and they can help you.

1.7 Cleaning routines

From mid-April you will be able to set up automated cleaning routines for various types of projects, as well as for subscriptions, candidate accounts and general applications. These routines are managed centrally within the system settings, with each cleaning routine being linked to its own consent agreement text, which can then reflect how this particular type of data is to be processed. You'll be able to manage the consent text and its related settings in ReachMee.

The rules set out in each policy ensure that cleaning is carried out according to your guidelines and that information regarding the exact wording of candidates' consent is saved for as long as their personal data is stored.

You can create policies which clean projects a certain period of time after either their conclusion or the application submission date. The policy which applies to any given project is established once the project is created.

For subscriptions, interest registrations and candidate accounts, you can have a policy for every careers page.

ReachMee also provides a temporary feature which allows you to review your existing projects, subscriptions, candidate accounts and general applications in order to be able to either delete or apply a policy in a lucid fashion. In cases where a policy is applied, candidates will automatically be notified of this via an email which you yourselves formulate.

You can also remove favourite contacts in advertisements, which are shown in the list when a user chooses a previously saved contact for a new advertisement. As these saved contacts contain personal data about the contacts, you should review this list regularly.

2. Instructions for changing settings

2.1 Organisational tree

Note!

• You can't remove units that have users or assignments linked to them. These entities must first be moved to another tree node.

- If you make changes to the organisational tree which involve moving a unit, this will also affect all users and projects linked to that node.
- If you move a project, all statistics linked to that project will also be moved to the new unit.
- If any of the organisational units are displayed on a job list or intranet site, these will also be affected as part of the move.

The organisational tree

Under the 'Admin' tab, click on 'Organisation tree' in the menu on the left-hand side.

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Overview of the organisational tree

Add a unit

Click on 'Add a unit' to create a new unit.

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Add a new unit

Create a sub-unit

Note that when filling in the form, you choose whether the unit should be a department in itself or added as a sub-department beneath another unit.

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Create a sub-unit.

Existing unit

Clicking on an existing unit allows you to see more information about users and assignments linked to the unit.

Contents tab for an existing unit

10

Modify an existing structure in the organisational tree and retain its statistics

If you make changes to the organisational tree, these may affect any statistics gathered from previous projects.

Where a large number of units and sub-units are moved as part of a significant reorganisation, you may want to plan a strategy for this so as not to affect your statistics. Here are three different ways to implement changes in the organisational tree whilst retaining existing statistics:

- 1. **Parallel organisation**. Create a parent unit called 'old organisational structure' and move your current structure into this. Create a new tree for your organisational structure and link new assignments to this. Concluded assignments and previous statistics are still visible within the old structure.
- 2. **Lump them together**. Move all your projects to a unit called 'Other'. All your previous assignments and statistics can be lumped together under this.
- 3. **Move your assignments to new units**. Create a new tree for your organisational structure and link new assignments to this. Move projects and units from the

previous organisational structure to the unit in the new structure to which they belong.

Whichever solution you choose, consider minimising the number of permissions linked to inactive units and assignments to ensure that new projects are not created under the wrong organisational structure and that roles correspond correctly with the new structure.

2.2 Roles and permissions

Note!

- Mark users who are no longer current as inactive. These will automatically be anonymised by ReachMee in an upcoming release.
- As a rule, a user who is assigned a role linked to a unit always has access to data further down in the structure and has the same permissions for all sub-units.
- It is possible to limit users' access and permissions for individual projects once they have been added as participants.

Assigning roles

To assign roles to users, go to the 'Admin' tab in the menu bar and click on 'Users' in the menu on the left-hand side under 'Account'.

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'Manage system users' – the first step to assigning roles.

Creating a new user

To create a new user, click on 'Create new' in the right-hand corner. Once the user has been created and saved, you can assign permissions.

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Creating a new user

Finding an existing user in ReachMee

You will see a list of users with an account in ReachMee. You can also search for a specific user via the search filter. To make changes to users, click on their name or username.



Finding a user

Changing or adding a role or roles

In the user form, click on the 'Authority' tab. Here you can see which roles users currently have in ReachMee and which part of the organisational tree the role assigns them permissions to.

To remove a role, click on the red cross in the relevant row.

To change a role or organisational unit, click on the button to the left of the cross (a small pen icon).

To add a role, click on the 'Add user role' button located in the right-hand corner above the list of the user's current roles. Here you can choose the user role and organisational unit to which the permissions will apply.



Assigning a role

Additional restrictions for individual projects

For individual projects it is also possible to further restrict or extend a user's access and permissions.

Adding a participant

In the project in question, go to 'Participants' in the menu on the left-hand side under 'Description'. Add a participant by entering the user's name in the search box and clicking on that user once it appears in the list. If you want to remove a participant from a project, click on the red cross icon.

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Adding a new participant

Changing permissions in a project

To change the participant's permissions in a particular project, click on the list icon next to the red cross in the same row as the user. If you use your mouse to hover over the icon, the words 'Show advanced settings' will appear. When you click on the icon, a list of the user's accesses in the project will then be displayed. Use the checkboxes to change the user's permissions in this particular project. Once you have made your desired changes to the settings, click on 'Save'.



Changing permissions in a particular project

16

Changing access to parts of the project

By choosing which process folders a created user has access to in the current project, you can also limit the user to being able to see only selected stages of the recruitment process. In the same advanced settings view, select the 'Process folders' tab. Here you can use checkboxes to select which folders the user may access. Participants will then only be able to see candidate data in the folders to which they have access.



Choose the stages of the process to which a created user should have access

2.3 Cleaning routines

Create cleaning policies for projects

The rules for automatic cleaning of projects are managed through cleaning policies within the GDPR settings. Here you can create as many different policies as your organisation may need with regard to the different recruitment processes or the varying requirements of each part of the organisation. Each policy defines the cleaning interval, along with the consent text with which the candidate must decide whether or not to agree.

In the case of projects there are two different types of cleaning policy to choose from:

• Clean a certain period of time after the project was closed (suitable for most projects)

• Clean a certain period of time after the application is received (suitable when open projects are used)

For both types, you can specify how long the application is to be saved after the project end date or the application submission. For the latter option, you will also need to indicate whether or not an application renewal request should be sent to the candidate. You will need to formulate your own texts for the consent agreement and renewal request email.

Once the policy is set up and ready to be made available for projects, click on the 'Available for new projects' checkbox and save.

As soon as the policy has been used in a project, it is locked, and further changes cannot be made.

Create a cleaning policy for projects

On this page you can view and create policies for handling personal data within projects, for subscriptions and for general applications.

Click create and choose the appropriate type for your policy.



Create a cleaning policy for projects

18 Recommendations and instructions for GDPR settings in ReachMee

Clean after the project was closed

Here you can enter settings for the cleaning policy you are creating, including the consent text you have developed. Once the policy is ready to be used, tick the checkbox "Enable for new projects".

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Clean after the project was closed

Clean after application was received

For this type of policy, you can also choose to send a renewal request to the candidates before it's removed. Once the policy is ready to be used, tick the checkbox "Enable for new projects".

ReachMee	Start Projects Candidates	Reports Admin		🖹 🚨 🛛 - Maja Lindström *
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Clean after application was received

Apply cleaning policies to existing projects

Once you have defined your automatic cleaning policies, we recommend that you review your existing projects and either apply the correct policy or delete the candidates. This is to ensure that you have the right to save the information in accordance with GDPR.

There is an administration page which you can use to review existing projects during the transition period. Here you can filter projects by type or date and then choose to delete or apply policies. If you choose to apply a policy, you must formulate an email text to be sent to candidates informing them of your new policy. This requires no action from the candidate.

Choose action and search within existing projects

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Choose action and search within existing projects

Delete applications in existing projects

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Delete applications in existing projects

Apply a policy on existing projects

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			8	14	Ekonom	Huvudkontoret, Region 1	3	20/12/2017	Emma Hedenström	10/04/2018			
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				4	Datasäkerhetsexpert	Huvudkontoret, Region 1, Department	1	13/10/2017	Jennifer Thorpe	25/10/2017			

Apply a policy on existing projects

Creating cleaning policies for candidate accounts, subscriptions and general applications The processing of subscriptions, candidate accounts and open applications also requires you to inform candidates of your new policy. These are automatically cleaned according to the policies you yourselves define within the GDPR settings.

For each of the three data types used on your careers page (these always include accounts), you need to create one policy and associated consent text per careers page.

Create a policy for candidate accounts

Candidate accounts are, in most cases, created in the background after the candidate submits an application and as such require no separate consent agreement. However, if the candidate creates an account by clicking on 'Register', the consent text you enter in the candidate accounts policy will be displayed. Candidate accounts are retained as long as there are applications linked to them before being erased according to the settings laid out in the relevant policy.

ReachMee	Start Projects	Candidates	Reports	Admin					📰 🚨 Θ * Maja Lindström *
Start / Admin									
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삼 Account			Policy name*				Active from		How does it work?
 Templates Web management 			Policy name				01/05/2018		Set cleaning preferences for when a candidate account should be removed and write the consent that the candidate has to agree to in
Reg.maint.			Career site*						order to create an account. You can have one active policy per career site. It becomes active from the date that is set in Activation date
Tree structures Organization tree									Whet will be deleted
© GDPR © Email signature			Consent text*				Language English	•	All information and documents associated to the account.
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			Set cleaning Delete candida 1 mont	g preference te account afte hs	r*		Cancel Create		

Create a policy for candidate accounts

Create a policy for subscriptions

Subscriptions require the consent of candidates, who also have the right to unsubscribe at any time. You must specify in the cleaning policy how long subscriptions are to be retained, along with how many days prior to cleaning the candidates will receive an email asking them to renew their consent should they still wish to subscribe.

ReachMee	Start	Projects	Candidates	Reports	Admin				😂 😡 🛛 × Maja Lindström *
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@ Web management IIII Reg.maint.				Career site*					update their subscription. The policy is applied from the date that is set in a this from There can only be one active policy precision
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				18 mon	hs				
				Ask candidate	to update t	r subscription*			
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Create a policy for subscriptions

General applications work in largely the same way as subscriptions except that you must choose whether to send a request to the candidate or simply delete the data straight away once the relevant period of time has elapsed.

Applying a cleaning policy to existing information

To ensure that you save only the candidate information to which you are entitled according to GDPR, we recommend that you review your subscriptions and open applications, and either delete them or apply the policy you have previously created.

With this in mind, ReachMee provides administration pages for use during the transition period ahead of GDPR coming into effect. Begin by identifying subscriptions and general applications which you want to delete. Once this is done, it's easy to apply a policy to the remainder and automatically send out email informing candidates of your new terms.

Candidate accounts will be deleted automatically according to your policy, provided no applications are linked to them.

Select action and search in existing general applications

ReachMee	Start	Projects	Candidates	Reports	Admin							•	0 - N	laja Lindström 👻
Start / Admin														
		۲	Clean a	Clean and apply policy for current general applications										
쓸 Account			Before y	Before you can apply a policy on current general applications, make sure that you have created and activated policies for each career site										
Settings Templates Web management Reg.maint. Image bank Tree structures Granization tree GDPR Email signature			You have	You have 5 general applications without policies										
			Action	Actions Apply new policy and inform candidates Delete applications Next										
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			N	lat Miles		nm@gmail.com		10/04/20	18	10/04/2018			Hemsida	

Select action and search in existing general applications

Apply a policy to existing general applications

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Start / Admin		Apply new policy a	and inform candidates					
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Apply a policy to existing general applications

25 Recommendations and instructions for GDPR settings in ReachMee

3. Support and assistance with GDPR-compliant settings

3.1 Support

Most of the above settings in ReachMee you can configure yourselves, with the exception of restricting the permitted document format and adapting the project owner's standard permissions. Contact support if you wish to limit the document formats candidates may upload to those which need not be downloaded to be visible and adapt the project owner's permissions.

Any other queries regarding GDPR-related settings fall outside the SLA (Service Level Agreement) and are therefore billable unless you have entered into an agreement which includes our GDPR package.

3.2 Personal data inventory template

As part of your preparatory work, it is advisable to keep a record of exactly which personal details you are requesting from candidates for recruitment purposes.

We have produced a template which might be of some help to you in your inventory work.

This template for keeping a record of the personal data you process is a tool both for making a start with GDPR and for preparing for your internal change management work. An inventory helps you answer the *why, who, what, when* and *where* of registering and processing personal data.

<u>Click here to download the inventory template</u>.

We have also created a template which allows you to plan in detail how to configure your settings for automatic cleaning and consent texts.

Since we at ReachMee are unable to assist you in making an inventory, we recommend that you seek the help of a GDPR expert or lawyer to determine exactly which personal details you ought to be processing.