

PRIVACY NOTICE FOR THE RECRUITMENT REGISTER OF HAAHTELA

This privacy notice (the "Privacy Notice") applies to the recruitment registers of Haahtela Group companies.

The controller is the company belonging to the Haahtela Group to which the data subject submits personal data in connection with a job search, i.e. the Haahtela Group company from which the job applicant applies for a job. The principles related to the processing of personal data mentioned in this Privacy Notice apply to all companies belonging to the Haahtela Group, and these companies are referred to in each of these Privacy Notices as "Haahtela" or "us". The contact details of each Haahtela Group company acting as the controller are listed in section 1 below.

This Privacy Notice describes what personal data we collect about our job applicants ("Job applicant", "you"), how we process them, and how you can exercise your rights as a data subject (such as the right to access your data and the right to require rectification).

We may update this Privacy Notice if this is necessary due to changes in the way the data is processed or for some other reason. We will not make any significant changes to this Privacy Notice or restrict the rights of Job applicants under this Privacy Notice without notifying of any such changes.

Please note that this Privacy Notice is only applicable for the processing of personal data by Haahtela as a controller.

Privacy and information security are important to us. We process all personal data in a manner that ensures appropriate security of the personal data and compliance with applicable laws and regulations.

1. CONTACT INFORMATION

CONTACT DETAILS OF THE CONTROLLER

Haahtela Ltd:

Business ID: 3006034-6
Address: Bulevardi 16 B, FI-00120 Helsinki, Finland
Telephone number: +358 201 101 200
Email: haahtela@haahtela.fi

Planier Oy:

Business ID: 0897430-1
Address: Bulevardi 16 B, FI-00120 Helsinki, Finland
Telephone number: +358 201 101 200
Email: haahtela@haahtela.fi

Haahtela-kehitys Ltd:

Business ID: 0864430-2
Address: Bulevardi 16 B, FI-00120 Helsinki, Finland
Telephone number: +358 201 101 200
Email: haahtela@haahtela.fi

Haahtela-rakennuttaminen Oy:

Business ID: 0616996-6
Address: Bulevardi 16 B, FI-00120 Helsinki, Finland
Telephone number: +358 201 101 200
Email: haahtela@haahtela.fi

Person responsible for the HR register:

Minna Kerko-Rämänen, tel. +358 201 101 235

Email: minna.kerko@haahtela.fi

2. PERSONAL DATA AND SOURCES OF INFORMATION TO BE PROCESSED

Our recruitment register contains information on Job applicants listed below:

- First and last name
- Date of birth
- Address and other contact information
- Personal identity code
- Identification details of the person's work of interest
- Information of education, work experience, language skills, qualifications, competences and positions of trust
- Job applicant's photo
- Information related to job interviews
- Information related to personal evaluations, suitability evaluations and other tests
- Possible communication related to job-seeking
- Any other information provided by the Job applicant such as a salary request
- Information related to the processing and status of the job application

We receive personal data processed in accordance with this Privacy Notice mainly from Job applicants themselves in connection with the recruitment process.

We can obtain information related to the processing and status of the application from our subcontractors who manage the recruitment process.

We may also collect some personal data from competent authorities.

3. PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

We use personal data in accordance with this Privacy Notice for the implementation of recruitment, communications related to recruitment, statistics and contacts.

The primary legal basis for the processing of personal data is the preparation of a contract between us and the Job applicant. When a Job applicant applies for a job from us, the processing of personal data is necessary for carrying out the measures preceding the conclusion of the contract at the request of the Job applicant.

We may also process personal data on the basis of legitimate interests in order to defend against any legal requirement related to the processing of personal data under this Privacy Notice.

We need to store and process certain data collected in the context of the recruitment process so that we can objectively justify the decisions taken in the context of the recruitment process.

Processing based on the legitimate interest of Haahtela does not pose significant risks to the interests, fundamental rights or freedoms of Job applicants.

For some of the personal data we process, we may ask you for your consent. In these cases, you can withdraw your consent at any time.

4. PERIOD FOR WHICH THE PERSONAL DATA ARE STORED

We will delete the personal data of Job applicants one year after the decision on the recruitment in question has been made.

5. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

Personal data processed in accordance with this Privacy Notice is not transferred outside the European Union, but we store your data in the European Economic Area ("EEA").

However, we reserve the right to use service providers located outside the EEA in the future. In such situations, we undertake to take steps to ensure that the level of protection of your personal data is adequate in the jurisdictions in which your personal data is processed. We provide adequate protection for the transfer of personal data to non-EEA countries through agreements with our service providers based on standard contractual clauses adopted by the European Commission or other similar arrangements.

For more information on personal data transfers, please contact us using the contact information above.

6. CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

We do not disclose your personal data to parties outside our organisation, except for the following situations:

- **For legal reasons**
We may disclose personal data to third parties in our organisation if access to the personal data is reasonably necessary to (i) comply with applicable law, regulation or court ruling; (ii) to detect, prevent or otherwise deal with fraud, money laundering, terrorist financing, information security or technical problems; or (iii) to protect the property of Haahtela or our customers or to ensure security or to ensure the purposes of public interest in accordance with law.
- **For authorised service providers**
We may disclose personal data to authorised service providers that provide our services such as our human resources system vendor in the EEA. Our agreements with our service providers include commitments to restrict the use of personal data and to comply at least with the privacy and information security standards set forth in this Privacy Notice.
- **Other legitimate reasons**
If Haahtela is a party to a merger, business acquisition or other trade sale, we may disclose personal data to a third party involved in that merger. However, we will ensure that all personal data is kept confidential. In this case, we will report the transfer as soon as reasonably possible to those Job applicants whose personal data are affected.
- **With explicit consent**
We may disclose personal data to third parties outside our organisation for reasons other than those mentioned above when we have the explicit consent of the Job applicant. The Job applicant has the right to withdraw such consent at any time.

7. RIGHTS OF THE DATA SUBJECT

- **Right of access to data**
You have the right to access the personal data we process concerning you. If you wish, you can contact us to determine which personal data we process and for what purpose this data is used.
- **Right to withdraw consent**
If the processing is based on your consent, you can withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of the processing of personal data that we processed prior to the withdrawal.
- **Right to demand rectification of data**
You have the right to require us to correct or supplement any inaccurate or obsolete personal data we store. By contacting us, you can update your contact information or other personal data.
- **Right to demand the erasure of data**
You can ask us to delete your personal data. If we do not have a legitimate reason not to delete the information, we will take the appropriate action in accordance with your request.
- **Right to object**
A Job applicant may object to the processing of their personal data if the data is processed on the basis of our legitimate interest or for purposes other than those mentioned in this Privacy Notice. If we have no

legitimate reason to continue processing your personal data, we will stop processing your personal data after you have opposed it.

- **Right to restrict the processing of data**

You can ask us to restrict the processing of your personal data, for example, when your requests for deletion, correction or objection are being processed and/or when we have no legitimate grounds to process your data.

- **Right to transfer data from one system to another**

You have the right to receive your personal data from us in a structured and commonly used format and independently transfer it to a third party.

- **Exercising rights**

If you wish to exercise any of the above rights, please send us the following information by post or email: Full name, address, telephone number and copy of a valid ID. We may request the provision of additional information necessary to prove your identity. We can reject requests that are unreasonably frequent, excessive or manifestly unfounded.

8. INFORMATION SECURITY

We use administrative, organisational, technical and physical safeguards to protect the personal data we collect and process. We use measures such as data encryption, passwords, firewalls, secure spaces, and systems with restricted access. Our security measures are designed to maintain an appropriate level of confidentiality, integrity, availability, recoverability and fault tolerance. We regularly test our systems and other hardware for vulnerabilities.

In the event of a breach that, despite information security measures, is likely to have a detrimental effect on the privacy of Job applicants, we will report the breach to the relevant Job applicant and other affected parties as required by applicable legislation and, if applicable data protection legislation requires, to the authorities as soon as possible.

9. FILING A COMPLAINT

You have the right to file a complaint with the supervisory authority if you feel that the processing of Haahtela's personal data violates data protection legislation.

Last updated: 21 October 2022