

Data Privacy Policy: Recruitment Register

EU General Data Protection Regulation (2016/679) articles 12, 13 and 14

This Data Privacy Policy describes the processing of personal data of the natural person ("Data Subject") in a joint Recruitment Register of the employer, Junttan Oy ("Data Controller"), according to the EU's General Data Protection Regulation (2016/679) articles 12, 13 and 14.

1. Data Controller

Junttan Oy

Matkuksentie 7, 70800 Kuopio, Finland

Other Junttan Legal Entities, locating outside of the EU or EEA, have committed to follow the regulations and clauses set out in the GDPR and other binding national data privacy regulations, as well as this Data Privacy Policy related to job applications. Other Junttan Legal Entities can process your personal data when you apply for a position located in these countries.

2. Register name: Recruitment Register

3. Persons responsible for the Recruitment Register

HR Director, Junttan Oy: Eeva Ahtiainen
eeva.ahtiainen@junttan.com, tel. +358 (0)40 128 9013

HR Coordinator, Junttan Oy: Maija Kauhanen
maija.kauhanen@junttan.com, tel. +358 (0)50 439 2241

For information on persons responsible for recruitment in other locations outside of the EU or EEA, please contact the persons mentioned above.

4. The purpose of processing personal data and legitimate interest

The purpose of the Recruitment Register is to support the company's recruitment process. The personal data saved in the Recruitment Register is the application information the applicant has sent to Data Controller, Junttan Oy, either as a specified job application and/or an open application. The Recruitment Register is electronic and everything is saved solely in this register.

5. Retention policy

Personal data of the applicant will be saved for six (6) or twelve (12) months, after which the personal data is deleted, unless the applicant him/herself reactivates his/her job application.

The selected applicant's personal data is saved only for as long as necessary, and Data Controller will only save personal data which is required for the employer to complete the purposes described in the *HR and Payroll Privacy Notice*. This data is also saved to comply with statutory obligations and to appropriately indicate the execution of these statutory obligations.

6. Data content

The Recruitment Register contains basic personal data (first name, last name, contact information) as well as education and work experience information. As per the consent of the job applicant, he/she can provide information on his/her family relation, hobbies, positions of responsibility and salary request.

7. Regulatory sources of information

Personal data is acquired only from the job applicant himself/herself in writing during the recruitment process. Furthermore, all the possible updates and correction requests regarding personal data are received from the job applicant himself/herself.

8. Applicant's personal rights

A job applicant has the right to:

- View the personal data that Data Controller has saved
- Require correcting the personal data
- Ask for deleting the personal data with the consent of the data subject
- Transfer the data from one system to another
- File a complaint to the data protection authority

The applicant can exercise these rights by contacting in writing the above-mentioned persons responsible for the Recruitment Register (item 3).

9. Data profiling

Personal data will not be used for automated decision making or profiling. An aptitude test may be conducted by a third-party reviewer with the consent of the interviewed applicant. The information gathered from the aptitude test will not be used for an automated decision making. The purpose of the information received from the aptitude test is only to support the recruitment process. The third-party reviewer will save the information from the evaluation for three (3) months, after which this information will be deleted from the third-party database forever. European Union's GDPR guidelines and requirements have all been taken into consideration and complied with, together with all our partners who conduct above-mentioned aptitude tests.

10. Transfer of personal data to third countries outside of the EU and European Economic Area (EEA)

With the applicant's consent to this privacy policy, the personal data can be transferred to those system suppliers, who handle employee's personal data in their systems.

GDPR guidelines and requirements have all been taken into consideration and complied with together with all system supplier partners.

Personal data is not transferred as such outside of EU or EEA. Data transfers are protected as necessary by the IT administration. For more information on the corporation's internal IT data security, please contact in writing Leena Karhu, Chief Digital Officer, leena.karhu@junttan.com.

11. Principles of protection in the recruitment register

Personal data of the applicants are being handled by the responsible contact person in Human Resources (HR Coordinator and/or HR Director) and the Function Manager responsible for the specific recruitment in process.

The personal data of the selected applicant for the position is sent to Human Resources and Payroll administration with the applicant's consent for arranging the employment.

Personal data is being handled by those persons in Human Resources and Payroll administration, whose responsibilities are to carry out obligations relating to the use of the Human Resources and Payroll register.

Electronic systems are protected with a user ID and a password. Personal data can be handled by a defined, limited group of users in the frame of their user rights. The

servers and systems are also protected by proper firewall and data security parameters.

Personal data is deleted as per the timeframe provided in this privacy policy and according to the statutory data saving regulations related to employment contract laws.

Should the person notice any shortcomings in the protection of the register or in the handling of personal data, he/she can contact the responsible persons of this register as per the instructions mentioned above.