

Human Resources / FIMV01

RECRUITMENT DATA PRIVACY POLICY

This Recruitment data privacy policy (“**Privacy Policy**”) explains how we process your data if you are applying or have applied for a job at Efore Telecom Finland Oy (hereinafter referred to as “**Efore**”, “**us**” or “**we**”). Efore respects your (the data subject’s) privacy and is committed to protecting your personal data, which is any information that can identify you as an individual person.

Efore is a personal data controller. This means that we are responsible for deciding how we hold and use personal data about you. This Privacy Policy is aimed at informing you of how we handle and protect your personal data relating to Efore’s recruitment processes. It provides you with certain information that must be provided under the GDPR and the Finnish Data Protection Act.

This Privacy Policy only applies to the personal data of job applicants and potential candidates for employment. It does not apply to our employees, contractors or clients, or other personal data that Efore collects for other purposes. We will process your personal data in accordance with this Privacy Policy, 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:

- (i) You have read and understood this Privacy Policy and agree to the use of your personal data as set out herein.
- (ii) You are not required to provide us with any personal data described in section 5 of this Privacy Policy but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.
- (iii) All of 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.
- (iv) This Privacy Policy does not form part of any contract of employment offered to candidates hired by Efore.

1. DATA CONTROLLER

Efore Telecom Finland Oy
Business ID: 3010225-1
Linnoitustie 4 B
02600 Espoo
Finland

Human Resources / FIMV01

2. CONTACT PERSON FOR THIS REGISTER

Miia Viljakainen, HR Business Partner
+358 29 360 9006
Linnoitustie 4 B
02600 Espoo
Finland

Please contact us at privacy@efore.com if you have any questions with regards to the protection of your personal data or if you wish to exercise your legal rights.

3. LAWFUL BASES OF PROCESSING

Personal data is being processed on the basis of one or more of the following:

Legitimate interest

We process your personal data pursuant to our legitimate interest for the recruitment process (GDPR Art. 6.1(f)). As a job applicant you can reasonably expect your personal data to be processed for the purposes described below in section 6, and based on the balanced interests of the data subject and the controller, the processing is justified, as the envisaged effects of such processing are favorable to the data subject, and, as the processing is subject to measures protecting the interests of the data subject (such as ensuring information security in accordance with section 11). The controller has the right to process personal data under a legitimate interest, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

Legal obligation

We also process your personal data to comply with our legal obligations under employment laws and other applicable laws (GDPR Art. 6.1(c)). This is the case, for example, when we process personal data to fulfill our statutory obligations as an employer, such as ensuring that a foreign person has the right to work in Finland.

Contract

We process your personal data when processing is necessary in order to take steps at the request of you prior to entering into a contract between you and Efore (GDPR Art. 6.1(b)).

Consent

Human Resources / FIMV01

We process your personal data when we have your consent (GDPR Art. 6.1.(a)) or explicit consent (GDPR Art. 9.2 (a)) to do so. If the processing is based on a consent, you have the right to withdraw your consent at any time, which means that the information can no longer be processed by Efore, unless the processing can be based on another legal basis. Exercise of the right does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

4. COLLECTION OF DATA

We mainly collect and process your personal data directly provided by you, provided by you via emails/LinkedIn and through job interviews (phone/face-to-face). Sometimes, we may collect your personal data from publicly available sources (such as LinkedIn). If reference checks are included in the process, we will also collect your personal data from the persons you have indicated as appropriate references in your application process.

Sensitive personal data is a subset of personal data and includes ethnicity, political opinions, religious or philosophical beliefs, health, trade union membership, genetic, biometric, sexual orientation or sex life, as well as other categories as prescribed by law. We do not seek to obtain and will not collect such data about a candidate unless permitted to do so by applicable law. If you provide us with any information of this nature you explicitly consent to it being processed in the manner described in this Privacy Policy.

5. CATEGORIES OF DATA

During the recruitment process, you may be asked to provide certain personal information, such as:

- your name and contact information, such as telephone number, e-mail address and home address;
- your country of residence;
- your job application and other information related to the recruitment process, such as language skills, IT-skills, employment and education details and other information provided by you in your resume/CV, diploma or any other documents/information disclosed by you to us;
- information provided by the references nominated by you;
- correspondence between you and us as well as data collected during the job interview;
- gender, date of birth or age;
- Information regarding driver's license, readiness to work abroad;
- your LinkedIn or other public profile; and
- possible consent to use your application for other position(s).

6. PURPOSE OF PROCESSING

Human Resources / FIMV01

We collect and use your personal data for purposes relating to our recruitment process, including:

- evaluation and selection of candidates for potential employment, as well as for future roles that may become available;
- communicating with you in relation to the recruitment;
- matching the qualifications to any opening positions within the given time frame;
- evaluation of interviews and reviewing the results of assessment tests;
- recordkeeping in relation to recruiting and hiring;
- making offers and providing contracts of employment;
- conducting pre-employment checks, i.e. determining your legal right to work in Finland; and
- responding to legal claims and defending against litigation in the event of potential disputes between Efore and the job applicant.

In case of a hire, your personal data will become part of your file, and our HR Privacy Policy will be applicable to your personal data.

7. DATA STORAGE TIME

We will store your personal data as long as necessary for the recruitment process. The data shall thereafter be deleted or destroyed unless legal basis for their continued processing remains.

Should you apply for a specific vacant post, the application and your personal data shall be stored during the recruitment process and will be stored for a maximum of one (1) year after the recruitment decision has been made.

Should you send us an open application, we shall retain the application and your personal data for a maximum of one (1) year following the submission of the application.

With your consent, your personal data shall also be stored for future job opportunities for a maximum of one (1) year after the recruitment decision has been made.

If the processing is based on a consent, you have the right to withdraw your consent at any time, which means that the information can no longer be processed by Efore, unless the processing can be based on another legal basis. Exercise of the right does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

If you become one of our employees, any personal data provided by you may become part of your file, and a different retention period will apply based on requirements in applicable legislation.

8. RECIPIENTS/CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

Human Resources / FIMV01

Your personal data may be accessed by recruiters and interviewers working at Efore. Individuals performing administrative functions and IT personnel within Efore may also have a limited access to your personal data to perform their jobs.

Except as described below, we do not sell, lease or otherwise disclose your personal data to a third party:

- We use Microsoft Office 365 services for our day-to-day business operations. Our emails, including personal data related to you, are stored on secure server operated by Microsoft within the EU and on our internal system.
- Your personal data may also be disclosed to our service providers such as web site hosting or information technology consulting services; web site management; legal services; accounting services; and other administrative and back-up and security services. Prior to disclosing any information to any third-party service providers, we will ensure that the providers are bound to strict standard of security and confidentiality. In addition, we will ensure that personal data will be provided under appropriate contractual arrangements in accordance with the GDPR and other applicable law.
- We may disclose information to the competent authorities in order to fulfil our statutory obligations.

9. TRANSFER OF PERSONAL DATA TO RECIPIENTS OUTSIDE THE EU/EEA

We do not transfer your personal data to any other recipients in countries outside the EU and EEA.

10. AUTOMATED DECISION-MAKING, INCLUDING PROFILING

Personal data mentioned above in section 5 is not subject to automated decision-making.

11. PROTECTING THE PERSONAL DATA

Information security and ensuring appropriate protection of personal data of job applicants is vital for us. We have implemented appropriate administrative, organisational, technical and physical safeguards to protect personal data we collect and process from loss, misuse, alteration, or destruction, including: access control, firewalls, and password arrangements. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience and ability to restore the data.

Access to electronically stored personal data are restricted to Efore HR. Any manual copies of your personal data will be stored in our premises, to which only authorized employees have an access, and will be destroyed according to storage time mentioned in section 7.

Human Resources / FIMV01

12. APPLICANTS' RIGHTS REGARDING DATA

You have the following rights, which may be restricted according to the GDPR and the applicable legislation. You may exercise these rights by contacting Efore, preferably in writing and by e-mail using the contact information provided in section 2.

The right of access

You have the right to obtain from Efore, upon request, confirmation as to whether or not personal data concerning you is being processed, and access to your personal data, and information concerning the processing of your personal data.

The right to rectification

You have the right to obtain from Efore without undue delay the rectification of inaccurate personal data concerning you, and the completion of incomplete personal data.

The right to erasure

You may ask Efore to erase personal data concerning you, for instance, in following situations:

- the personal data are no longer required for the purposes for which they were collected or otherwise processed;
- you withdraw consent of processing and no other grounds for processing exist;
- you object to processing under the legitimate interest of Efore;
- your personal data have been unlawfully processed; or
- your personal data must be erased in order to comply with legal obligation applicable to Efore.

The right to restriction

You have the right to obtain from Efore a restriction of the processing of personal data where one of the followings applies:

- You contest the accuracy of the personal data. In such cases, the processing will be restricted for a period enabling Efore to verify the accuracy of the personal data.
- The processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead.
- Efore no longer needs the personal data for the purposes of the processing, but it is required by you for the establishment, exercise or defence of legal claims.

Human Resources / FIMV01

- You have objected to the processing of the personal data for purposes other than direct marketing and is awaiting verification on whether the legitimate grounds of Efore override those of yours.

The right to portability

If you have provided your personal data to Efore, you have the right to receive and to transfer such personal data to another data controller if:

- the processing is carried out by automated means; and
- the processing is based either on your consent or the processing of personal data is necessary for the implementation of pre-contractual measures at the request of you.

You do not have the right to transfer data from one system to another if such personal data is processed on the basis of the legitimate interest or legal obligation of Efore.

The right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, which is based on legitimate interest of Efore.

The right to lodge a complaint

You have the right to lodge a complaint with the competent supervisory authority if you consider that processing of personal data breaches your rights pursuant to applicable law.

Tietosuojavaltuutetun toimisto (Office of the Data Protection Ombudsman)

Ratapihantie 9, 00520 Helsinki

tietosuoja@om.fi

13. REVISIONS

Efore reserves the right to change and modify this Recruitment Data Privacy Policy from time to time. When we post changes to this Recruitment Data Privacy Policy we will modify the "Effective Date" at the top of this Recruitment Data Privacy Policy to indicate when such changes have come into effect.