

Lappset Group Oy's privacy statement regarding job applicants

1. Controller

Lappset Group Oy
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lappset@lappset.com
(hereinafter "We" or "Lappset").

2. Contact person in register-related matters

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3. Name of the register

Job applicant's register

4. What is the legal basis for the processing of personal data and its purpose?

The processing of personal data is based on:

- Compliance with the obligations and special rights of the controller and data subject under labour law;

- The data subject's express consent for the processing of his/her personal data

The purpose of processing personal data is related to the measures associated with recruitment in order to manage the recruitment process and support the allocation of human resources including the management of the data of persons (data subjects) who apply for employment with Lappset in order to facilitate the necessary communications and decision making in filling vacancies.

Additionally, we may process personal data for direct marketing and electronic direct marketing purposes. We apply automated decision-making (including profiling) to identify data subjects' personal profiles, online behaviour, age and consumer patterns. We use this information to target marketing efforts and develop the services.

5. What information do we process?

We process the following personal data in connection with the job applicants' register:

- 1. data subject's basic information**, such as name, date of birth, gender, mother tongue*, username and/or other identifier, password;
- 2. data subject's contact details**, such as a private e-mail address*, telephone number*, street address;
- 3. information related to the position the data subject is applying for**, such as information on the position involved including the form and type of employment as well as information on the person in charge of the recruitment process, salary request and information related to the commencement of work. More detailed information is provided in the job advertisement;
- 4. information disclosed by the data subject in connection with recruitment and important for assessing suitability for the position and other personal information about the applicant, his/her/their**

background etc., such as a photograph, information on studies and other training, occupation, work history data (e.g. former employers, start dates and duration of employment and type of work duties), knowledge of languages, description of personal characteristics, various certificates and assessment including references to any portfolios and profiles on the Internet or available from other sources as well as references;

5. information on the progress of the recruitment process of the data subject, such as information on any follow-up interview or suspension of the recruitment process;

6. any other information voluntarily disclosed by the data subject in connection with the recruitment process or otherwise published for professional purposes, such as a LinkedIn profile or any other information gathered by the controller with the data subject's consent.

Disclosure of the items of information marked with an asterisk (*) is necessary to allow Lappset to proceed with the recruitment process.

6. Where do We gather the information from?

The main source of the information to be stored in the register is the job applicant him / her / themselves. Other sources of information are used to the extent allowed by law. If necessary, We also use recruitment consultants as sources of information.

By filing a job application, the applicant gives permission to acquire information on his or her profile published for professional purposes to the extent that the retrieval of such data is necessary and related to work performance in the vacant position being applied for.

7. Who do we disclose the data to and do we transfer the data to outside the EU or EEA?

We process the data ourselves. Additionally, the personal data of job applicants saved in the register may, with the applicant's consent, be



disclosed to other Lappset Group companies in order to bring together job applicants and employers.

We disclose personal data in ways permitted or required under the applicable laws to parties who have a legal and/or contract-based right to access information contained in the register. We may also disclose data for other purposes in accordance with the law of Finland.

We have taken steps to protect your personal data by entering into the necessary processing agreements with our subcontractors. As we are unable to identify all subcontractors by name, for example because of projects still in the development stage, we have decided only to indicate the types of subcontractors used.

We do not disclose the data contained in the register to parties other than those indicated above unless the data subject's explicit consent has been requested and obtained for such disclosure.

Personal data will also be transferred for processing outside the European Union or the European Economic Area. We have made sure that such transfers are always carried out in the manner required by the General Data Protection Regulation using either the model contract clauses approved by the EU Commission or the Privacy Shield system.

8. How do We protect the data and how long will we retain it?

Access to the databases containing personal data is limited to the employees entitled to process such data in the course of their work duties. Adequate technical and organizational measures have been taken to protect the register. The data is saved in databases protected by usernames, passwords, firewalls and other technical means. The register is stored on a protected server maintained by the technical operator and the data communications are encrypted. Those processing the data are bound by a non-disclosure obligation. The databases and back-up copies are located in locked rooms and can only be accessed by pre-designated individuals.

We retain personal data for as long as necessary for the intended purpose of such data. As a rule, the data can be retained for one (1) year for recruitment purposes. The data will be erased in two (2) years' time. If the job applicant becomes our employee, we retain the information provided by him/her/their in the capacity of a job applicant as part of his/her/their personal profile in accordance with the privacy statement regarding employee data.

We assess the need for the retention of the data regularly with due regard to legal requirements. Additionally, we take other reasonable measures to ensure that the register does not contain any information on data subjects that is inconsistent with the purposes of processing, or outdated or incorrect. We correct or erase all such data promptly.

9. What are your rights as a data subject?

Data subjects have the right to access their personal data in the data file and demand that any incorrect data is corrected or erased.

Under the General Data Protection Regulation (effective as of 25 May 2018), data subjects have the right to object to or limit the processing of their personal data or file a complaint regarding the processing of such data with the data protection authority.

For special personal reasons, you may also object to profiling and/or other processing measures when processing of your data is based on a recruitment relationship between you and Lappset. When filing such a request, you need to identify the specific situation you invoke as the basis for your objection. We may only refuse to comply with such an objection on the grounds set out in law.

As a data subject, you have the right, at any time and free of charge, to object to such processing, including profiling to the extent that it is related to direct marketing.

Any requests must be submitted in writing to the contact person indicated in section 2 above.