

Privacy Notice for the Job Applicants Register

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1 Controller and contact for the register

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("company" or "we")

2 What is the purpose and the legal basis of processing personal data?

The purpose of processing personal data is to receive and to process job applications and to manage our recruitment processes. We process data related to the recruitment process of the people who have applied for our positions to enable contacting the applicant and for the decision making when filling in the positions.

The legal basis for processing personal data is our legitimate interest, which is based on the need to process personal data for recruitment purposes and which is formed of the connection between us. During the final stage of recruitment, the legal basis for personal data processing is the preparation and execution of an employment contract.

In the following situations we will ask for your consent for personal data processing:

- collecting personal data from references
- processing personal data in aptitude assessments
- processing personal data when executing medical tests

3 What data do we process?

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

- **basic information** such as first name, date of birth, language, username and/or other identifier, password;
- **contact details** such as private email address, private phone number, home address;
- **information regarding the position in question** such as information of the nature and type of the employment and information of the contact persons designated for the application process, salary request, information of the beginning of the job. More specific details appear in the job search advertisement;
- **important information regarding suitability that you have provided us in connection with the recruitment process and**

- other information of yourself, your background etc.*** such as a photograph, information regarding study and education, occupation, information regarding work history (such as employers, starting date and duration of employment and nature of the duties), language skills, other special skills and competence, description of personal features, different kinds of certificates and evaluations and references to the portfolios, profiles and other sources on the Internet and references and personality and aptitude assessments performed based on your consent and information regarding them;
- ***information regarding the progress of the recruitment process*** such as information of following interviews or the interruption of the recruitment process;
 - ***other possible a information*** that you have provided us voluntarily in connection with the recruitment process or specifically published for professional purposes such as a LinkedIn profile or information we have separately collected based on your consent.

Providing your data is a requirement for us to be able to move forward in the application process.

4 From where do we receive information?

The source of information saved in the register is primarily you as a job applicant. Other sources of information are used within the limits of the applicable regulations. We may use recruitment consultants if needed.

By submitting a job application you consent for us to collect information from your profile published for professional purposes to the extent that collecting data is necessary and related to job performance taking into consideration the open position.

5 To whom do we disclose or transfer data?

By rule, we do not disclose data from the register to external parties, unless we have requested and gotten your consent for the disclosure of data for e.g. aptitude assessments. We disclose personal data in a manner permitted and obligated by the current legislation to parties, who based on legislation, collective agreements and/or contract have the right to receive data from the register, such as the employment authorities. We may also disclose data for other purposes in accordance with the Finnish legislation.

We process data ourselves and use subcontractors for processing personal data on our behalf. We use subcontractors for processing personal data for the following services:

- HR and recruitment services
- IT management (incl., communication channels used in the recruitment process)

We have ensured the protection of your data by making necessary contracts with the subcontractors. We cannot name all our subcontractors, in part due to projects in development, so we have opted to name only the types of subcontractors.

6 Do we transfer data outside of the EU or EEA?

In general, personal data is not transferred outside of the EU/EEA.

The IT service providers participating in the production of our systems used in recruitment may, in exceptional circumstances, have access to the data system from outside the EU/EEA for the purpose of providing technical support. In such a case, data transfers outside the EU/EEA are carried out in compliance with the standard contractual clauses and data protection measures approved by the EU Commission.

7 How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work have the right to process personal data, are entitled to use the systems containing personal data. The persons processing data are bound by professional secrecy. Each user has a personal username and password to the system. The data is collected into databases, that are secured with firewalls, passwords and other technical measures. The databases and their backups are in locked premises secured by access control and can be accessed only by certain pre-designated persons. Paper files are stored in locked cabinets and the facilities are physically secured with e.g., access control measures.

We store personal data for only as long as it is necessary due to the purpose of use. In principle data concerning open applications can be used for six (6) months to fill an open position within the company. Applicant data is destroyed in two (2) years. If you become our employee, we store the data you have provided as a job applicant and the information related to the recruitment process as a part of your HR profile and according to our privacy notice regarding our employee register.

We evaluate the need to store data regularly considering the applicable legislation. In addition, we take care of such reasonable measures which ensure that no incompatible, outdated or inaccurate personal data, taking into account the purpose of the processing, is stored in the register. We correct or erase such data without delay.

8 What are your rights as a data subject?

You have the right to inspect the personal data stored in the register concerning yourself and the right to demand rectification or erasure of the data.

Insofar as the processing is based on consent, you also have the right to withdraw or change your consent. Withdrawing your consent does not affect the lawfulness of processing before the withdrawal of the consent.

You have the right to object or to demand restriction of the processing of your data and to lodge a complaint with the supervisory authority.

On grounds relating to your particular situation you also have the right to object other processing activities when the legal basis of processing is the legitimate

interest. In connection with your request, you shall identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

The contacts and requests concerning this privacy notice must be submitted in writing or in person to the contact point mentioned in section one (1).