

RECRUITMENT PRIVACY NOTICE

August 2020

Itäinen & Ojantakanen Attorneys Ltd is committed to protecting your privacy and personal data and we process all your personal data in accordance with the applicable data protection legislation. In this Privacy Notice we inform you how we collect and process your personal data during the recruitment process, and what your data protection rights are.

By personal data we refer to any data that allows the identification of a natural person. Processing means any operations performed on that personal data, such as collection, recording, organisation, storage, use, combination, disclosure, transfer, deletion or erasure.

Personal Data We Collect

In connection with our recruitment processes we may process the following types of personal data:

- your name, date of birth, and contact information (address, telephone number, e-mail);
- information about your education, skills and professional experience;
- other information that you may provide to us during the recruitment process;
- information that your referees may provide to us during the recruitment process;
- assessments generated internally by our recruitment team based on the above information.

How Do We Collect Data?

The data we process is mainly obtained from you personally through your job application and attachments and during interviews. We may also process data generated by our internal recruitment team, data provided by referees you have named and data obtained from your previous employers.

How Do We Use Your Data?

We will process your personal data in the course of our recruitment process in order to assess whether you could be suitable for an open position that you have applied for. We will not use your personal data for any other purposes. Your personal data will not be subject to automated decision making.

If you send us an open application to be considered for upcoming positions, we will keep your data for a maximum period of one (1) year, unless you notify us earlier that you wish to withdraw your application.

What are the Legal Grounds for Processing Your Data?

Your personal data may be processed on one or more of the following legal grounds:

- your instructions for the purposes of possibly entering into an employment agreement with you;
- our legitimate interest, to the extent not overridden by your interests or fundamental rights or freedoms;
or
- your expressly given consent.

You have the right to withdraw your consent to the processing of your data at any time. Please note, that if you withdraw your consent to processing of necessary personal data, we may have to discontinue the recruitment process with you.

If you are employed by us your personal data, to the extent relevant for the administration of your employment, will continue to be processed in accordance with our employee privacy notice.

Disclosures of Your Data

Your personal data will not be disclosed to any third parties. However, your data may be accessed by our external service providers who process data on our behalf, mainly for the purposes of maintaining our IT systems. All our service providers are obliged by their service agreement to process data only on our behalf and for the agreed purpose and have entered into appropriate data protection agreements with us.

Transfers of Your Data

We do not transfer your personal data outside the EEA, with the exception of certain processing that due to the technical environments of our external IT service providers may be necessary for the maintenance of our IT systems. Any such transfers are made only subject to appropriate safeguards as required by the applicable data protection legislation.

How Do We Protect Your Data?

We have implemented and appropriate technical and organizational security measures to protect your personal data against accidental, unlawful or unauthorized access, use, disclosure, alteration, destruction or loss. We have put in place internal security policies and procedures for the protection of personal data and our systems comply with the applicable industry standards. Only the individuals participating in the recruitment process have access to your personal data. Upon expiry of the applicable retention period we will securely destroy your personal data in accordance with applicable laws and regulations.

How Long Do We Keep Your Data?

We will only process your personal data for as long as necessary for the purpose we collected it for. In order to assert or defend against legal claims, we may retain certain data until the end of the relevant statutory limitation period or until the claim has been settled. Retained data will be stored separately and will not be processed for any other purpose. Please contact us if you would like further information about specific retention periods for your personal data.

What are Your Rights?

The applicable data protection legislation provides you with certain rights regarding the processing of your personal data. These rights include:

- **Access:** You have the right to request access to your personal data that we process and, with certain exceptions, to obtain copies of that data;
- **Rectification:** You have the right to request that any inaccurate, incomplete or obsolete data be rectified;
- **Objection:** You have the right to object to the processing of your personal data in certain circumstances, including for marketing purposes;
- **Restriction:** You have the right to request us to restrict the processing of your personal information in certain circumstances, including when your request for erasure cannot be fulfilled;
- **Data Portability:** You have the right to request that personal data which has been provided by yourself and is processed by us for the fulfilment of a contract or with your consent, is provided to you, or to another data controller, in a commonly used, machine-readable format;
- **Erasure (right to be forgotten):** You have the right to request us to erase your personal data for example when the data is no longer necessary for the purposes for which it was collected or if your personal data have been unlawfully processed;
- **Complaints:** If you feel that any of your rights under applicable data protection laws have been violated, you have the right to lodge a complaint with the applicable supervisory authority, or to seek a remedy through the courts.

Contact Information

Itäinen & Ojantakanen Attorneys Ltd is the controller of the personal data described in this Privacy Notice. If you have any questions or comments concerning the processing of your personal data, or if you would like to exercise any of your data subject rights, please contact:

Marjo Pörsti
Itäinen & Ojantakanen Attorneys Ltd
Fabianinkatu 9 A, 00130 Helsinki
Tel: +358 9 4780 3300
Email: office@itainenojantakanen.fi

Updates to this Privacy Notice

We may, from time to time, make changes to this Privacy Notice reflecting any changes in our processing procedures or changing legal requirements. Any changes we make will be posted on this page. Please check back periodically for updates.