

PRIVACY POLICY FOR RECRUITMENT – KFS FINLAND OY / KREATE GROUP

The purpose of this Privacy Policy is to inform job seekers at KFS Finland Oy / the Kreate Group on the processing of their personal data in the manner required by Regulation (EU) 2016/679 of the European Parliament and of the Council (the General Data Protection Regulation).

1. Data controller

KFS Finland Oy
Business ID: 2467931-0
Haarakaari 42, 04360 Tuusula
Tel. +358 207 851 480

2. Contact person for Data controller

Anne-Mari Saloniemi
Tel. +358443553924
Email: anne-mari.saloniemi@kreate.fi

3. Purpose and basis for processing personal data

The register contained in the TalentAdore recruiting system employed by KFS Finland Oy and Kreate Oy as well as any possible other group companies is used to collect personal data concerning job applicants, as specified under item 4 below, with regard to recruitment in the companies belonging to the Kreate Group at any given time. The purpose for the processing of personal data is to perform recruitment for job applicants. Processing the relevant personal data is a necessary prerequisite for the recruitment process.

Depending on the situation, the basis for the processing of personal data may be the job applicant's consent to the processing or KFS Finland Oy's and Kreate's legitimate interest in processing the relevant data concerning the job applicant for the purpose of recruitment. Any data processed for the purpose mentioned hereinabove is not processed for any purpose other than recruitment. In accordance with the GDPR, the data subject has the right to object to the processing based on legitimate interest. In this case, however, the job applicant must understand that, if the data subject objects to the processing, KFS Finland Oy and Kreate cannot process the data for the job applicant in question and, thereby, their job application.

4. Groups of data subjects and categories of personal data being processed

In connection with the recruitment, KFS Finland and Kreate may process the following personal data concerning job applicants:

- first name and last name
- rank, profession or title
- date of birth
- gender
- photograph
- contact information (mailing address and email address, telephone number)
- link to LinkedIn profile, profile data
- completed assessments and reviews
- data on education and work experience
- data describing experience and expertise
- information on permissions and bans, such as marketing bans
- wishes concerning career and salary

- contact details for references
- for the purpose of security clearance: the person's basic information and details concerning the position

5. Sources of data

KFS Finland Oy and Kreate Oy mainly collects personal data from the job applicant during the recruitment process. In addition to the personal data provided by the job applicant, KFS Oy and Kreate Oy may collect personal data concerning the job applicant from official registers in order to determine the credibility of the job applicant in accordance with applicable law.

KFS Finland Oy and Kreate Oy may also gather data from public databases used for professional purposes, such as LinkedIn or the CV database maintained by TE Services, and information on the job applicant's work performance from their earlier employers, with the consent of the employee. Before entering into an employment relationship, KFS Finland Oy and Kreate may have a security clearance performed on the job applicant if the applicable legislation allows it.

Within the recruitment system, artificial intelligence will classify the applications according to how well the personal data provided by the job applicants corresponds to the requirements of the open position. However, the decision is not solely based on automated processing, since persons participating in the recruitment will process all applications during the recruitment process.

6. Disclosure of data and data transfers outside of the EU or the European Economic Area

The data is received and processed by KFS Finland's and Kreate's employees who are responsible for recruitment. The data is not disclosed to parties outside of the companies belonging to the Kreate Group at any given time, with the exception of the cases listed below. At the data controller's discretion, data may be disclosed within the limits allowed and obligated by the legislation in force at any given time. Data may only be disclosed for purposes that are compatible with the original purposes of the processing or when further processing can otherwise be justified for the purposes outlined in this policy. Data may be disclosed in a manner that is required by competent authorities or other parties and compliant with valid legislation.

Data may also be disclosed to a buyer in relation to corporate transactions, in case KFS Finland Oy and Kreate is selling or otherwise reorganising its business. As a rule, data is not transferred outside of the area of the European Union's Member States or the European Economic Area, unless it is necessary for the purposes of the processing of personal data stated hereinabove or for the technical implementation of the data processing; in these cases, the transfers will adhere to the requirements of the EU's General Data Protection Regulation.

7. Retention and erasure of data

Personal data is stored in the TalentAdore recruitment system as active data during the recruitment process and as passive data for 18 months following the process, after which it is permanently deleted. If KFS Finland Oy and Kreate wishes to utilise the data for a job applicant who was not chosen in order to fill any other positions that may become available following the end of the recruitment process, the job applicant who was not chosen may be invited into the Talent Community register contained within the recruitment system. If the job applicant consents to this by approving a bespoke link contained in an email that is separately sent to them, the job applicant's data will be stored for 12 months at a time, following which the recruitment system will automatically request new consent for storing the data. If the job applicant denies their consent, their data will be permanently deleted from the system. If the job applicant does not wish to have their data stored following the recruitment process, they can notify the contact person listed under item 2 and

have their data deleted. The data controller will verify the identity of the data subject before processing the request.

8. Rights of the job applicant and the exercise thereof

The job applicant has the right to request access to their personal data, rectification or erasure of erroneous or inaccurate data concerning them and restriction of the processing of data as well as the right to data portability and the right to object to the processing of their data, as provided for in the applicable data protection legislation. The job applicant may exercise their rights stated hereinabove by contacting the person listed under item 2.

If the processing of personal data is based on consent, the job applicant has the right to withdraw the consent provided for the processing of personal data. Withdrawing consent will not affect any processing of personal data that took place prior to the withdrawal.

If the job applicant considers that the Kreate Group is in breach of the regulations concerning the processing of personal data, they have the right to file a complaint with the supervisory authority.

9. Technical and organisational security measures for the processing of data

Personal data that is being processed is protected by means of firewalls, passwords and other technical means that are commonly accepted within the information security field. On websites and in other services, data is protected by means of SSL encrypted connections and other necessary means. Only employees specified by the data controller have access to the data contained in the register, subject to access privileges granted by the data controller.