

# Privacy Notice for Recruitment Candidates

Last updated: 7.3.2024

This Privacy Notice describes how Conficap Oy (hereinafter also “we”) processes personal data of recruitment candidates. Conficap complies with the EU General Data Protection Regulation (2016/679) and applicable national data protection legislation when processing personal data.

Personal data means any information that makes it possible to identify a person. It may be information that directly identifies a person, such as a name, personal identification number, telephone number, e-mail address or photograph, or information that, when combined with other information, makes it possible to identify a person.

## 1 Controller and contact details

Conficap Oy (2862035-9)

Address: Salomonkatu 17 A, 00100 HELSINKI (Finland)

Contact for privacy matters: [dataprotection@conficap.com](mailto:dataprotection@conficap.com)

## 2 Purpose and legal basis for personal data processing

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 from the connection between us
- your consent, which can be requested for example in the following situations:
  - collecting personal data from referees
  - 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;
- **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 start date;
- **necessary 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 status of the recruitment process** such as information of following interviews or the interruption of the recruitment process;
- **other possible 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 Sources of personal data**

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 Disclosures of personal data and transfers outside the EU/EEA area**

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 only disclose personal data in a manner permitted and obligated by the current legislation to parties, who based on legislation and/or contract have the right to receive data from the register, such as the employment authorities.

We have outsourced activities involving the processing of personal data to subcontractors who maintain our IT systems. We conclude personal data processing agreements with our subcontractors as required by data protection legislation.

The IT systems we use may allow the service provider to access data from outside the EU/EEA. Where personal data is processed outside the EU/EEA, we will ensure that the transfer is justified under the General Data Protection Regulation, e.g. by an EU Commission adequacy decision or the application of standard contractual clauses.

#### **6 Security of personal data**

Personal data are processed with due care and the data systems storing personal data are adequately protected by firewalls, passwords, and other technical means. Where data are stored on Internet servers, the physical and digital security of their hardware shall be adequately ensured. Databases and their backups shall be located in locked and secured premises. We ensure that stored data, server access rights and other information critical to the security of personal data are treated confidentially and only by those employees whose job description includes this.

## **7 Retention of personal data**

The job applicant's data will be deleted after two (2) years unless the person is selected for the position. 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 according to our privacy notice regarding our employee register.

We assess the need to store data regularly considering the applicable legislation. Additionally, we take all the reasonable measures to ensure that no data, which is incompatible for the purposes of the processing, obsolete or incorrect, is stored in the register. We correct or erase such data without delay.

## **8 Rights of data subjects**

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 provided there are legal grounds to do so. You also have the right to withdraw or change your consent regarding personal data processing.

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.

## **9 Updates to this Privacy Notice and inquiries regarding personal data**

We may update this Privacy Notice from time to time if there are changes in the processing of personal data. Any communication or request regarding this Privacy Notice should be made in writing or in person to the contact point designated in section one.