

## PRIVACY POLICY – JOB APPLICANTS

This privacy policy describes how we process job applicants' personal data in our recruitment processes. The entity acting as the controller of your personal data is the company which you are applying to, which is one of the three specified controllers listed below in section 1.

### 1 CONTROLLER

Controller	Ahlström Capital Oy (hereafter "Ahlström Capital" or "we")
Business ID	1670034-3
Address	Eteläesplanadi 14, 00131 Helsinki
Phone Number	+358 10 888 18

or

Controller	A. Ahlström Kiinteistöt Oy (hereafter "Ahlström Kiinteistöt" or "we")
Business ID	2566575-4
Address	Laviantie 22, 29600 Noormarkku
Phone Number	+358 50 5183677

or

Controller	Ahlström Konsernipalvelut Oy (hereafter "Ahlström Konsernipalvelut" or "we")
Business ID	2581366-5
Address	Laviantie 22, 29600 Noormarkku
Phone Number	+358 40 0945518

### 2 CONTACT PERSON

Name	Outi Kaivo-oja. Head of HR
Email	outi.kaivo-oja@ahlstromcapital.com
Phone Number	+358 40 094 5518

### **3 LEGAL BASIS AND PURPOSE OF PROCESSING**

When you apply for a position at any of the companies defined above in section 1, we process your personal data based on our legitimate interest as necessary for the recruitment process.

We may also, based on your consent, process your personal data for carrying out aptitude tests.

Your personal data can in certain situations be processed for the fulfilment of a contract if the recruitment process leads to employment.

Your personal data is not being used for automated decision-making that would have legal or similar effects on your rights.

### **4 PERSONAL DATA COLLECTED**

The personal data we process of you include:

- contact information such as name, birthday, address, email address and telephone number;
- educational information including completed degrees and dates of completion;
- employment history including current and previous employers, titles and job descriptions;
- language skills;
- references; and
- any other information you wish to disclose.

### **5 RETENTION PERIODS OF PERSONAL DATA**

Your personal data is stored during the recruitment process. We may however retain certain personal data longer in situations required by law.

We may also store your application for future recruitment processes based on your consent.

## **6 HOW DATA IS COLLECTED**

As a rule, the data is obtained from you during the recruitment process through job applications and job interviews. With your consent, personal data can also be collected from third parties, such as the service provider carrying out the aptitude assessment. Personal data can also be collected from your referees.

## **7 DISCLOSE OR TRANSFER OF DATA**

Processing tasks may be outsourced to external service providers in accordance with and within the limits set by data protection legislation. Main operators to whom processing tasks have been outsourced include service providers of aptitude tests.

## **8 TRANSFER OF DATA OUTSIDE THE EU/EEA**

The personal data is not transferred outside the European Union or the European Economic Area.

## **9 SECURITY MEASURES**

Your personal data is processed only by those persons who are specifically assigned to perform the tasks that require the processing of your personal data.

Any manual material will be stored in a locked space, accessible only to separately authorised persons. All persons who process the material are bound by confidentiality obligations.

The electronic material is stored in systems which are protected by usernames and passwords and other various technical protections.

The purpose of the above actions is to ensure the confidentiality of personal data, the availability and integrity of the data, and the exercise of the rights of data subjects.

## 10 RIGHTS OF THE DATA SUBJECT

As a data subject, you have certain rights under the General Data Protection Regulation 2016/679 (GDPR). Below are short descriptions of these rights.

**Right to access:** Data subjects have the right to receive confirmation from the controller on whether the controller is processing personal data that concerns them. The controller must provide the data subject with a copy of the personal data being processed. As a rule, the exercise of rights is free of charge.

**Right to rectification:** Data subjects have the right to demand the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

**Right to erasure:** In certain cases, specified in Article 17 of the GDPR, the data subject has the right to have the controller erase data concerning them. For example, when the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.

**Right to restriction of processing:** In certain cases, specified in Article 18 of the GDPR, the data subject can request the controller to restrict the processing of personal data concerning them. The right to restriction exists, for example, when the data subject contests the accuracy of the personal data. In such cases, the processing will be restricted for a period enabling the controller to verify the accuracy of the personal data.

**Right to object:** In certain situations, the data subject has the right to object to the processing of their personal data, that is, request the controller not to process it at all. If the data is processed for the performance of a task carried out for the purposes of the compelling legitimate interests pursued by the controller or a third party, the data subject has the right to object to the processing on grounds relating to their particular situation. In such cases, the processing must be stopped unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject.

**Right to data portability:** The data subject has the right to receive the personal data that they have provided to a controller in a structured,

commonly used, and machine-readable format and, if desired, transmit that data to another controller.

**Right to withdraw consent:** If personal data is processed based on consent, the data subject has the right to withdraw consent by informing the controller. Withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

**Right to lodge a complaint with the supervisory authority:** The data subject has the right to lodge a complaint with the competent supervisory authority if the data subject considers that the controller has not complied with the applicable data protection regulation.

## 11 **CONTACT INFORMATION AND THE USE OF DATA SUBJECT RIGHTS**

In all matters relating to the processing of personal data and in situations involving the exercise of rights, the data subject should contact the controller using the contact details provided at the beginning of this privacy notice.