

# Are Oy's Privacy Statement for Applicant Data File

Last updated: January 13, 2023

## 1. Data controller and contact information for matters related to data file

Name: Are Oy (business ID: 0989493-6)  
Kaivokselantie 9  
01610 Vantaa, Finland  
E-mail: [gdpr@are.fi](mailto:gdpr@are.fi)  
Phone: +358 20 530 5500 (switchboard from 8 a.m. to 4 p.m.)

## 2. The purpose and 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 job application-related information for people who have applied for employment at Are in order to allow us to contact applicants, to assess suitability for a position and to make decisions on recruitment.

The processing of personal data is based on Are's legitimate interest to process personal data as required by its recruitment process, in professional interaction between Are and the applicant. In certain situations, processing of personal data may be required to carry out duties that are needed before signing an employment contract between Are and the applicant, and later to fulfil the obligations of the employment contract.

Moreover, where required or allowed by national regulation, Are may request consent from the applicant for the collection of certain personal data or for particular type of processing of personal data. Your consent may be requested in e.g. the following situations:

- for collecting personal data from references
- for processing personal data in suitability assessments
- for processing personal data in conjunction with medical tests

In addition, where required by national regulations, Are may process the personal data of the selected applicant in order to determine the applicant's reliability or to commission a security clearance. All applicants are notified in advance of such processing and of the commissioning of a security clearance.

## 3. Types of data processed and data sources

We process the following information of job applicants in connection with the applicant data file:

- basic information, such as name, preferred language of communication, user ID and/or other unique identifier, password, other information provided on the application or CV, such as date of birth;
- contact information, such as private e-mail address, private phone number, home address;
- any information related to the job applied for, such as the form and nature of employment, information pertaining to the appointed person in charge of the job application process, desired salary and information related to starting work.

More specific information is available in the job advertisement;

- important information regarding the applicant's suitability provided to us in connection with the application process and other applicant (background) information, such as picture, education and training-related information, occupation, working history (such as employers, employment start dates and durations, period of notice and nature of duties), language skills, other special skills, description of personal characteristics, various certificates and evaluations and references to online portfolios, profiles and other sources, and job references;
- results of the personal evaluation and suitability assessment performed with the applicant's consent and any related information, results of the reliability assessment or the security clearance;
- cover letter and additional information included in the free-form application, applicant's wishes regarding the position, any other additional information submitted with the application;
- information regarding the progress of the recruitment process, such as information on a second interview or suspension of the process.

Providing personal data is a prerequisite for proceeding with the application process.

Processing of personal data involves applicant profiling. Personal data is used to assess the suitability of the applicant and to score their attributes relevant to the position. Profiling is not used to make automated decisions. Any decision regarding an applicant's suitability for an applied position is made by an Are recruiter.

#### 4. Data sources

The data is primarily collected from the data subject by way of a job application and subsequent interviews. With the data subject's consent, personal data may also be collected from other sources, such as a service provider conducting the suitability assessment. Personal data may also be collected from references provided by the data subject. Where necessary, we also source information from recruitment consultants.

Personal data may be collected without the applicant's consent to carry out legal duties as required by the authorities or to adhere to a specific regulation on collecting or receiving data.

By submitting a job application, the applicant provides their consent for the collection of their data from a public profile for professional purposes to the extent necessary and relevant for the open position and the ability to perform any tasks thereof.

#### 5. Data transfers outside of the EU or the EEA

As a rule, we do not disclose data in the data file to external parties, unless we have specifically requested and received your consent to disclose the data for specific purposes, such as suitability assessments. We disclose personal data as allowed and required by current legislation to parties who are legally and/or contractually entitled to receive data from the data file, such as judicial consultants and authorities.

We process the personal data ourselves but also employ contractors in the processing of data. We employ contractors in the processing of personal data in the following services:

- HR and recruitment services
- IT system administrators

We ensure the privacy of your data by obligating our contractors to agree to requisite processing agreements. We cannot name all our contractors due to, for instance, projects we may have in the development stage. To that end, we have made a decision to only name the types of contractors we use.

In principle, the data is processed in the EU or the EEA. However, the IT systems we use may allow the service provider to access personal data from a country outside the EU/EEA, such as the United States for e.g. providing technical support. If personal data is processed outside the EU or the EEA, we ensure that the contractor is committed to adhering to the standard contractual clauses for the transfer of personal data adopted by the European Commission, and any required additional security measures.

## 6. Data security and data retention

The data security of all manually entered materials and data in the data file has been secured as required by law. Access is provided only to individuals who have been designated by Are and who need the data in their work. They access the data with user IDs and passwords. Data displayed in an online service can only be accessed by way of strong authentication. The data is collected into databases that have been secured with user IDs, firewalls and other technical means. The data is located in a closed network that has been secured technically by means of a firewall. Anyone processing the data is obliged to maintain secrecy on any information received. The databases and any backup copies thereof are stored in locked facilities and accessible only to specifically designated individuals.

If the submitted application is for a specific task, the applicant's information is removed from the data file automatically 30 months from the last application update. In case of an open application, the data is automatically removed six months from the last application update. If you are employed by us, we retain information you have provided to us as a job applicant and information relevant to the recruitment in your employee profile in accordance with our employee data privacy statement.

We regularly assess the need to retain data, taking applicable legislation into consideration. In addition, we agree to take reasonable actions to ensure that the personal data of data subjects in the data file is not incompatible, obsolete or inaccurate considering the purposes of the processing. We shall rectify or dispose of such data immediately.

## 7. Your rights as a data subject

You are entitled to review your information stored in our employee data file and demand rectification or erasure of any erroneous, obsolete or illegitimate data. You have the right to file a notice of appeal to a supervisory authority (the Office of the Data Protection Ombudsman). Contact information for the Office of the Data Protection Ombudsman is available at [www.tietosuoja.fi/en](http://www.tietosuoja.fi/en).

Where the processing is based on your consent, you are entitled to withdraw or amend the consent at any time. Withdrawing consent does not affect the legality of the processing carried out prior to the withdrawal.

For specific personal reasons, you also have the right to object to processing of your personal data when the processing is based on our legitimate interest. Upon raising the objection, you must specify the particular situation on which you object to processing of your personal data. We may only refuse to honour the request to object by demonstrating compelling legitimate grounds to do so.

## 8. Contact information and privacy statement revisions

We kindly ask you to make all requests regarding this privacy statement in writing or in person in the address specified in the first (1) paragraph.

Are may revise and update the privacy statement where necessary. Where required by applicable legislation, the revisions are reviewed with our employees. However, we recommend that you review this privacy statement from time to time.