Privacy Statement
Processing of Personal Data in Recruitment

Last updated: 22 September 2026

1. Data controller and contact details

Name: Are Oy (company registration number: 0989493-6)
Kaivokselantie 9
01610 Vantaa
Email:gdpr@are.fi
Tel. 020 530 5500 (switchboard, 8 am–4 pm)

2. What are the purposes and legal basis for the processing of personal data?

The purpose of processing personal data is to receive and process job applications and to manage our recruitment processes. We process data relating to the job application process of individuals who have applied for our services in order to facilitate necessary communications, assess the applicant's suitability and make decisions when filling vacancies.

The processing of personal data is based on Are's legitimate interest in processing personal data as required by the recruitment process within the context of the professional relationship between Are and the job applicant. In certain cases, the processing of personal data is also necessary to carry out measures prior to the conclusion of an employment contract between Are and the job applicant and to fulfil the terms of the employment contract.

Furthermore, where required or permitted by national regulations, Are may request the job applicant's consent to the collection of certain types of personal data or to a specific type of processing of personal data. Your consent will be requested, for example, in the following situations:

- the collection of personal data from referees
- processing of personal data in suitability assessments
- processing of personal data in connection with medical tests

Furthermore, where required by national regulations, Are may process the personal data of a job applicant selected for a post in relation to the results of a security clearance check. The individual will be informed in advance of such processing and of whether the post requires a security clearance check.

3. What data do we process and where do we obtain it from?

In connection with the job application process, we process the following data relating to job applicants:

- basic details such as name, language of communication, username and/or other unique

identifier, password, and any other information provided in the application or CV, such as date of birth;

- contact details such as a personal email address, personal telephone number and home address;
- information relating to the role you have applied for, such as details of the form and nature of the employment relationship, details of the person responsible designated during the recruitment process, salary expectations, and information relating to your start date . Further details are set out in the job advertisement;
- information relevant to your suitability that you provide to us during the recruitment process, and other information about yourself, your background, etc., such as a photograph, details relating to your studies and education, profession, details of your employment history (such as employers, start dates and durations of employment, notice periods and the nature of your duties), language skills, other specialist skills, a description of your personal qualities, various certificates and assessments, as well as references to online portfolios, profiles or other sources, and references;
- the results of any personality and aptitude assessments carried out with your consent, and related information, as well as the results of any reliability or security checks;
- a free-form cover letter and additional information, the applicant's preferences regarding the future role, and any other additional information submitted as an attachment to the application;
- information regarding the progress of the recruitment process, such as details of a follow-up interview or the suspension of the recruitment process.

Providing personal data is a prerequisite for us to proceed with the recruitment process.

The processing of personal data involves the profiling of job applicants. Personal data is used to assess and score the applicant's suitability for the role in question. Profiling is not used to make automated decisions; instead, decisions regarding the applicant's suitability for the role applied for are made by Are's recruitment team.

4. Where do we obtain our data from?

As a general rule, data is collected directly from the data subject via job applications and job interviews. With the data subject's consent, personal data may also be collected from other sources, such as a service provider carrying out an aptitude assessment. Personal data may also be collected from referees named by the data subject. Where necessary, we also use recruitment consultants as a source of information.

Personal data may be collected without the job applicant's consent from public authorities in order to carry out a task prescribed by law, or if the collection or receipt of such data is specifically provided for by law.

By submitting a job application, you consent to us collecting data from the profile you have published for professional purposes, to the extent that such collection is necessary and relates to your performance in the role, taking into account the vacancy in question.

5. To whom do we disclose data, and do we transfer it outside the EU or the EEA?

We do not routinely disclose data to external parties unless we have specifically requested and

obtained your consent to do so, such as for the purposes of suitability assessments. We disclose personal data, as permitted and required by applicable legislation, to parties who have a legal and/or contractual right to access the data, such as legal advisers and public authorities.

We process the data ourselves and utilise subcontractors acting on our behalf in the processing of personal data. We use subcontractors for the processing of personal data in relation to the following services:

- HR and recruitment services
- IT system providers

We have ensured your data protection by entering into the necessary data processing agreements with our subcontractors. We are unable to name all subcontractors, for example due to projects currently in the development phase, so we have opted to list only the types of subcontractors.

As a general rule, we process personal data within the EU or the EEA. The IT systems we use may allow a service provider to access personal data from a country outside the EU/EEA, such as the United States, for example to provide technical support. Where personal data is processed outside the EU or the EEA, we ensure that the subcontractor has committed to the European Commission's standard contractual clauses for the transfer of personal data and to the necessary additional safeguards.

6. How do we protect your data and for how long do we retain it?

Manual records and data are protected in accordance with data security requirements as stipulated by law. Access is restricted to those individuals designated by Are who require the data to carry out their duties. They are provided with usernames and passwords. Access to the data displayed on the online service is restricted to users who have undergone strong authentication. The data is stored in databases protected by a username, password, firewall and other technical measures. The data is located on a closed network that is technically protected by a firewall. Those who process the data are bound by a duty of confidentiality regarding the information they receive. The databases and their backups are located in locked premises, and access to the data is restricted to certain pre-designated individuals.

Job applicants' data is automatically deleted from the recruitment system we use 30 months after the date on which the application details were last updated. If you become one of our employees, we will retain the information you provided as a job applicant and any information relating to your job application as part of your staff profile, in accordance with our privacy notice concerning employee data.

We regularly assess the necessity of retaining this data, taking into account the applicable legislation. In addition, we take reasonable measures to ensure that no personal data of data subjects is retained that is incompatible with the purposes of processing, out of date or inaccurate. We will rectify or erase such data without delay.

7. Your rights as a data subject

You have the right to access the data concerning you and to request the rectification or erasure of any data that is inaccurate, out of date or unlawful. You have the right to lodge a complaint regarding the processing of personal data with the supervisory authority (the Office of the Data Protection Ombudsman). The contact details for the Office of the Data Protection Ombudsman can be found at www.tietosuoja.fi.

Insofar as the processing is based on consent, you have the right to withdraw or amend your

consent at any time. Withdrawing your consent does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

For specific personal reasons, you also have the right to object to processing activities concerning you where the basis for processing is a legitimate interest. When making such a request, you must specify the particular circumstances on which you base your objection to the processing. We may refuse to comply with a request to object only on grounds provided for by law.

8. Enquiries and amendments to the privacy notice

Please submit all enquiries and requests regarding this privacy notice in writing or in person to the contact point specified in section one (1).

Are may make changes to and update this privacy policy as necessary. Where required by applicable legislation, such changes will be discussed with staff. However, we recommend that you review this privacy policy from time to time.