

PRIVACY STATEMENT ON THE PERSONNEL REGISTER

1. Controller

Lehto Group Plc (2235443-2)

Voimatie 6 B, 90440 KEMPELE, Finland rekrytointi@lehto.fi, Tel: +358 20 320 000 (hereinafter referred to as the "Controller")

2. Contact person

Outi Kannuksela

Väritehtaankatu 8, 01300 VANTAA, Finland tietosuoja@lehto.fi

3. Data included on the register

This register may include data belonging to the following data groups: data subject's name, date of birth, address, email address, phone number, education, courses attended, qualifications, degrees, appraisals, key targets, job title, information about the salary, payroll and salary-like benefits, travel reservations, travel and expense information, information concerning day-to-day time tracking, building site video surveillance material, holiday information, information and certificates concerning absences due to illness and other absences, and any other information related to the employment relationship. As regards subcontractors' employees from outside the EU, copies of the passport and residence permit are retained.

4. Purpose and legal basis for processing personal data

The purposes of personal data processing are to realise the employment relationship between the Controller and the data subject and to manage the related information. As the employment relationship goes on, personal data processing is based on the employment contract between the Controller and the employee and, after the employment relationship has ended, the legal basis for processing is the Controller's compliance with statutory obligations (including the Accounting Act and the Employment Contracts Act).

With regard to the employees of subcontractors, processing is based on the Controller's justified benefit or fulfilling statutory obligations.

5. Recipients of personal data

Data subjects' data is processed by parties such as the employees of the Controller's HR, IT and payroll departments, the data subject's supervisors or their representatives, and other employees of the Controller whose duties require them to process the data. Personal data may also be processed by other external parties subject to separate assignment by the Controller (such as video surveillance on building sites) and the contact people of system suppliers.

The Controller has signed agreements on data protection meeting the requirements of the EU General Data Protection Regulation with all of the external processors of personal data, and these agreements ensure the confidentiality of data and other matters.

Data may be disclosed if necessary on the basis of final court judgments and orders by the authorities based on law.

6. Data sources

In principle, personal data about data subjects is collected from the data subjects themselves at the beginning of and during their employment relationships.

7. Personal data retention period

The Controller only retains personal data for the purpose for which it was originally collected. All retention periods are based on applicable legislation. For example, personal data must be retained for the purpose of issuing employment certificates for 10 years after the employment relationship ends and the retention period for information concerning any occupational accidents is 20 years following the end of the employment relationship.

8. Data subject's right to object to personal data processing

Data subjects are always entitled to object to personal data processing related to direct marketing. Similarly, if the processing is based on any other form of justified benefit of the Controller, data subjects are always entitled to object to personal data processing on grounds related to their specific personal circumstances.

9. Other rights of data subjects

a. Right to access data and right to correct data

Data subjects are entitled to receive a copy of the personal data about them without charge and demand that the Controller correct inaccurate and incorrect personal data about the data subject without undue delay. Taking into consideration the purposes of data processing, data subjects are entitled to have incomplete personal data supplemented, for example by providing additional information.

Data subjects are also able to inspect and edit some of their personal data on the systems for which they have been given user IDs.

b. Right to restrict processing

Data subjects are entitled to have data processing restricted only to data retention if the data is not correct; the processing is unlawful and the data subject does not want the data to be erased; the Controller no longer needs the data for the purposes of processing but the data subject needs it in order to prepare, bring or defend legal action; or if the data subject has objected to personal data processing in relation to the grounds of processing for justified benefit by invoking their specific personal circumstances in anticipation of verification of whether the Controller's justified grounds take precedence over the data subject's grounds.

c. Right to have data erased

Data subjects are entitled to have data about them erased from the register in circumstances such as when the data is no longer needed for the original purposes. Data subjects are also entitled to demand the erasure of data when they have exercised their right of objection in accordance with Section 10 and there is no longer a justified reason for processing or when the processing has been unlawful.

d. Right to withdraw consent

When the processing is based on consent, data subjects are entitled to withdraw consent at any time during processing.

e. Right to transfer data from one system to another

Data subjects are entitled to have the data about them transferred from one system to another in cases such as when the legal basis for processing was the data subject's consent or agreement and the processing is conducted automatically.

f. Right to make a complaint to the supervisory authority

Data subjects are entitled to file complaints with the supervisory authority if they consider that regulations concerning data protection have not been complied with when personal data about them was processed. In Finland, the supervisory authority is the Data Protection Ombudsman (www.tietosuoja.fi). However, this shall not prejudice the data subject's other means of administrative appeal or legal remedy.

10. Realising data subjects' rights

Data subjects may exercise their rights as referred to in Sections 8 and 9 by sending an information request to tietosuoja@lehto.fi. If necessary, the Controller may ask the data subject to specify its request in more detail in writing and it may verify the data subject's identity before handling the request. The Controller may refuse to fulfil a request on the grounds laid down in the General Data Protection Regulation.

11. Potential risks related to the rights and freedoms of data subjects

The Controller and the system providers who are related to the customer and marketing register and who process personal data on the Controller's behalf are committed to processing and protecting personal data in accordance with applicable legislation.

All data included in this register is stored confidentially and access to personal data is limited to the people who are authorised to process the personal data by virtue of their duties. These people are under an obligation of professional secrecy. The connection between the user's browser and the Controller's server is encrypted. The material for electronic processing is collected into databases, which are protected by firewalls, passwords and other technical measures. All manually processed personal data is destroyed securely.

12. Transfer of data outside the EU or the EEA

Personal data is not disclosed outside the EU or the EEA

