

PRIVACY STATEMENT ON THE RECRUITMENT REGISTER

1. Controller

Lehto Group Plc (2235443-2)
Voimatie 6 B, 90440 KEMPELE,
Finland (hereinafter referred to as the
"Controller")

2. Contact person in matters concerning the register

Tanja Kanerva
Väritehtaankatu 8, 01300 VANTAA,
Finland. Tel: +358 20 320 000
tietosuoja@lehto.fi

3. Data included on the register

The personal data belonging to this register may be processed by the Controller's recruitment system TalentAdore, on recruitment chat (www.lehto.fi) and on the Controller's internal recruitment tip system.

TalentAdore may include data belonging to the following data groups about job applicants who have applied for positions in the Controller's Group: first name, surname, email, phone number, place of residence, location of the travel-to-work area, the applicant's free-form description of themselves, a link to a LinkedIn profile, other links added by the applicant and a photograph. The database may also include other files handed over by the applicant, such as work and education certificates, videos, links provided by the applicant to pages related to job-seeking, such as LinkedIn or a website-based reference, the salary requested for the position sought, language skills, IT expertise, special expertise, education and qualification information, the degree of completion of studies, application letter, CV, certificates, photograph, work samples/portfolio, list of references, the applicant's wishes regarding the position sought or contact details of referees. Reports concerning security clearance and aptitude assessments commissioned with the applicant's express consent may be added to the system in extraordinary cases.

The Controller's recruitment chat services may include a free-form discussion with a potential job applicant (including the data groups listed for TalentAdore above specific to the case, covering at least the person's contact details, as well as the discussion about the employee's work history and the positions that interest him/her), the timestamp of the discussion and technical identification data.

The Controller's internal recruitment tip system may include the following data: the person's name, present employer, present position within the company, phone number, email address, from where and how the person who gave the tip knows the potential employee, which position and service area the potential employee would be suitable for according to the person who gave the tip, any attachments, such as the CV or portfolio, and any other additional information.

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4. Purpose and legal basis for processing personal data

The purpose of processing personal data is to realise the Controller's recruitment processes and to save information about potential job applicants for later recruitment needs. The Controller's intention is to receive job applications from people who register as job applicants, and the applications may be internal (changing jobs internally within the Controller's organisation), external or applications via internal recruitment tips. The processing of personal data obtained via recruitment chat is based on the same purposes.

People interested in the Controller as an employer may request to be transferred to the recruitment systems internal Talent Community belonging to the Controller to await vacant positions, and they may be sent messages related to vacant positions or other messages corresponding to the person's interests. The person may restrict direct marketing about jobs at any time.

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The legal basis for processing personal data is the Controller's justified benefit in relation to recruiting employees as a party seeking employees and offering jobs.

5. Recipients of personal data

Data subjects' data is processed by employees in the Controller's HR department and supervisors, or representatives of supervisors, participating in recruitment. Personal data may also be processed by external parties (including temporary staffing service companies) subject to separate assignments. Recruitment chat data is received either by an employee in the Controller's own HR department or a representative of an external service provider. 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.

If necessary, data may be disclosed to the authorities on the basis of court judgments and orders or requests by the authorities based on law.

6. Data sources

In principle, the data used for recruitment is collected from data subjects themselves or from the referees who recommend them. For internal recruitment tips, data about suitable candidates may be provided by an internal referee.

In extraordinary cases, a concise security clearance process may be commissioned with the applicant's consent for performance by the authorities (for example, financial administration positions or positions on construction projects for the Defence Forces) or an aptitude assessment conducted by an external party. In such cases, data subjects will be informed of the clearance and assessment processes separately. The reports concerning security clearance and aptitude assessments may be added to the Controller's recruitment system.

7. Personal data retention period

The Controller retains data provided by applicants in relation to job applications as referred to above on its applicant register for 24 months (based on Section 26 of the Non-discrimination Act). After this 24-month retention period, the aforementioned data will be retained as backup files for a further eight weeks to enable the investigation and rectification of any erroneous deletion or other errors.

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

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

Objecting to processing may make it impossible for the applicant to be taken into consideration in the recruitment process.

9. Other rights of data subjects

a. Right to access personal data and right to correct data

Data subjects are entitled to receive a copy of the personal data about them or otherwise obtain access to their personal data without charge. Data subjects are entitled to demand that the Controller correct inaccurate and incorrect personal data about the data subject without undue delay.

After submitting a job application, data subjects will receive an email with a link to the job application system, which they can use to inspect and edit their own data until the Controller has begun processing the person's data in the recruitment process. Once data processing in the recruitment process has begun, the data subject must present information requests to the Controller in accordance with Section 10.

b. Right to have data erased

Data subjects are entitled to have data about them erased from the register if the data is no longer needed for the original purposes and the data processor no longer has any grounds based on matters such as contractual or statutory obligations.

c. 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 processing purposes but the data subject needs it in order to prepare, bring or defend legal action; or the data subject has objected to personal data processing on grounds related to their specific personal circumstances in anticipation of verification of whether the Controller's justified benefit takes precedence over the data subject's grounds.

d. Right to transfer data

Data subjects are entitled to have the data that concerns them and that they have delivered to the Controller 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.

e. Right to withdraw consent

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

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, exercising this right shall not prejudice the data subject's other means of administrative appeal or legal remedy.

10. Fulfilment of information requests and other requests concerning data subjects' rights

Data subjects may send requests concerning exercising their rights as stated in Sections 8 and 9 above to tietosuoja@lehto.fi. 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 and applicable information security procedures

The Controller and the providers of recruitment systems (TalentAdore Ltd and Upseller Finland Oy, the system supplier providing the Giosg recruitment chat service) who process personal data on the Controller's behalf are committed to processing and protecting personal data in accordance with applicable legislation.

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, and access is restricted to the personnel whose duties require the use of these systems. A user ID and password are required in order to use the systems, and only the personnel authorised for this duty can access the processed personal data. System audits are performed regularly in order to ensure the continuity of information security.

12. Transfer of data outside the EU or the EEA

Personal data is not transferred outside the EU or the EEA.

13. Automatic decision-making

No automatic decision-making is carried out on the data included in the recruitment register.