

DATA PROTECTION STATEMENT (=PRIVACY STATEMENT) FOR APPLICANTS AND FORMER EMPLOYEES

Updated 11.8.2020

Based on the General Data Protection Regulation ((EU) 2016/679))

1. Name of the register

HR and Recruitment Registry

2. The Registrar (Controller)

Tapro Oy

Kauppakatu 5

48310 KOTKA

FINLAND

3. Person in charge of the personal register

Seija Tähtinen

Director, HR, Sourcing and Business Operations

E-mail: seija.tahtinen@tapro.fi

4. The purpose for which my personal data is collected

The processing of personal data is necessary in order to establish the obligations and rights related to the employment relationship. We only process personal data for pre-determined purposes, which are

- Payroll information for pay slip, employment certificates, monitoring of working time, monitoring of annual leave (measures related to termination of employment)
- Statistics, reporting and analytics on terminated employment as part of Tapro Oy's personnel reporting and analysis, monitoring and developing HR processes, competence development, personnel satisfaction development and work management, and proactive support
- Conclusion of the employment contract, the recruitment process and related actions such as recruitment contact

The basis and purpose of the processing of personal data of applicants is primarily the implementation of the employment contract or the actions preceding it. In addition, the data may be processed, where applicable, on the basis of the data subject's consent or the legitimate interest of the controller (legal basis).

If the data is processed **on the basis of a legitimate interest (the so-called legal basis of the controller)**, there is a substantive employment relationship between the controller and the data subject and the processing can be considered to meet the data subjects' reasonable expectations. The controller shall ensure that the processing carried out on this basis is proportionate to the data subjects. The legitimate interest of the registrar may also be based on e.g. the project nature of employment relationships, job offering after employment and direct marketing to employees.

If the processing of personal data is **based on consent**, the data subject has the right to withdraw his or her consent at any time by contacting the controller.

5. What kind of information is collected about me

Personal data groups to be processed

- Information related to the recruitment process, e.g applications with attachments and possible personal assessments
- Basic information (e.g first name, surname, personal identity number, date of birth, nationality, sex, passport copy)
- Contact information (e.g phone number, address, e-mail address)
- Terms of employment and related payments (e.g title, salary, working hours, place of employment, duration of employment, fringe benefits, tools, access rights, account number, daily allowances, fees, tax information)
- Salary Events
- Degree, qualifications, specialties
- Permits, demonstration tests (e.g work permit)
- Language skills
- Suitability and management assessments
- Statutory obligations of the employer (e.g insurance information)
- Employee satisfaction surveys, departure and arrival surveys
- For former employees, data collected during the employment relationship
- Information related to competence development, e.g course register
- Appraisals
- Hourly records and actual working hours
- Absences and holidays

6. From what sources is my information collected

- Personal information is collected from the person him/herself
- For former employees, employment-related information can be collected and used from the information systems used by Tapro
- Tax cards are obtained by direct transfer from the tax administration
- During the term of the employment relationship, data are also collected through employee satisfaction surveys

7. How long my data will be kept

- Personal data will only be kept for as long as is necessary for the purposes defined in this statement and for as long as it is necessary for a lawful purpose or as required by law.
- Personal data is deleted when their storage is no longer necessary for the law or of either party to implement the rights or obligations.

8. Who processes my personal information and where it is disclosed

Personal data is processed by Tapro Oy's responsible persons participating in Tapro Oy's recruitments. Our third parties / partners (such as a payroll / accounting firm) process personal information about our assignment on our behalf and in accordance with our instructions. Personal data will not be disclosed or transferred to third parties without the employee's consent. Third parties may be used for recruitment on a case-by-case basis.

8.1. Where information can be provided:

- Within Tapro Oy's group for administrative reasons
- Third parties / partners (such as payroll / accounting firm) when they process personal information on our behalf and in accordance with our instructions
- For authorities such as the tax administration, KELA (Social Insurance Institution of Finland), pension and accident insurance companies, occupational health care partners
- The personal data of the employee may be disclosed to those customer companies of the controller and its group companies for whose duties (tasks) the employee is or may be employed
- To the extent permitted or required by law, e.g to comply with a request for information from a competent authority or in connection with legal proceedings
- In possible mergers or sales of all or part of the business
- In a situation where we believe that the surrender is necessary to exercise our rights, to protect the safety of the data subject or others, to investigate abuses or to respond to a request from an authority.

The registrar (controller) uses subcontractors / partners (such as in managing recruitment process the recruitment system ReachMee's supplier is Talentech) to process the data. Talentech is responsible for the technical implementation of the registry.

Data can be transferred to a limited extent outside the EU / EEA area. In the case of transfers outside the EU / EEA, the transfer will take place using the EU Commission's standard contract clauses or any other transfer mechanism permitted by law. Personal data will not be transferred outside the EU / EEA unless it is necessary for the purpose of the personal data mentioned above. The controller shall comply with data protection legislation and its requirements and take appropriate safeguards accordingly.

9. Rights of the data subject (registered)

- The right to verify your personal information. You may also request that your personal information be corrected, updated, or deleted at any time. Please note, however, that personal data that is necessary for the purposes defined in this statement or that is required to be retained by law cannot be deleted. You can exercise your right by contacting the person in charge of the personal register.
- The right to object to or restrict the processing of your personal data to the extent required by applicable law
- The right to withdraw your consent at any time when we process your personal data on the basis of consent. We will not then process personal data unless there is another legal basis for processing.
- The right to lodge a complaint with the supervisory authority. If you believe that the processing of personal data concerning you has violated the Data Protection Regulation, you have the right to lodge a complaint with the supervisory authority.

10. How my personal information is protected

Tapro Oy uses appropriate physical, technical, and administrative safeguards to protect information from misuse. Such means include e.g. control and filtering of network traffic, use of encryption technologies, secure equipment facilities, proper access control, controlled access and control of their use, instruction of persons involved in the processing of personal data and risk management in the planning, implementation and maintenance of our services. Tapro Oy carefully selects the third parties / partners / subcontractors it uses and uses contractual and other arrangements to ensure that the information is also processed by them in accordance with legislation and good data protection practice.

11. Information on the use of automatic decision-making and profiling

Automatic decision making is not enabled. Profiling refers to the automatic processing of personal data, in which the characteristics of a person are assessed using this data. Personal data can be grouped by means of profiling as a basis for personnel reporting, but no automatic decision-making is performed on this basis.

12. Changes to the data protection statement (=privacy statement)

We reserve the right to change, revise and update this privacy statement. Changes may also be based on changes in legislation. If we make changes to it, we will indicate the date of update in this privacy statement. We encourage you to review this privacy statement regularly, and in particular before disclosing personal information to us.