

## **PRIVACY POLICY**

### **Job applicant and employee candidate register**

#### **General**

In order to give you the best possible service, we may need to collect and process certain personal data about you. However, we respect and value your privacy and we are committed to protect it. This privacy policy contains information about what personal data we collect, what are the key principles of processing the data and what rights you have relating to your personal data.

Jaana Toppari Consulting Oy processes your personal data in compliance with this privacy policy and applicable laws, so we ask you to read this policy carefully. We may do updates to this privacy policy from time to time associated with development of our business operations or changes in applicable laws. Updated privacy policy can be found from our website.

By using our services and website or contacting us, you accept that we process your personal data according to this privacy policy. If you do not accept these terms, it is likely that we cannot provide any services to you.

#### **For what purposes is personal data collected and used?**

We collect, store and process your personal data only for predefined purposes. The main purposes for processing personal data are:

- offering recruiting and direct search services to assist our corporate customers to find people to open positions;
- helping job applicants to find work that matches their profile;
- fulfilling our contractual obligations;
- fulfilling legal obligations and responding to legal claims;
- customer communications and responding to contact requests;
- development of our business; and
- targeting our services to you.

#### **What data you collect about me and from which sources?**

We collect personal data about you mainly from yourself when you contact us or use our services by sending us your resume or being involved in a direct search process. In addition to this, we may collect data about you from public sources and registers, such as press releases, nomination news and LinkedIn. With your consent, we may also collect personal data about you from references.

Typically we may get following personal data directly from you:

- Contact details
- Job application
- Resume
- Work history
- Education
- Work experience
- References
- Information given in interviews
- Possible WOPI-profile, if any

Information from public sources:

- LinkedIn-profile details, such as work history, degrees, language and other skills
- Nomination news
- Information from press releases and public websites

With your consent we may also:

- Contact former employers or references

## **What is the basis for processing your personal data?**

We make sure that we always have a legal basis to process your personal data. We may process your data on a several different basis. Firstly, we may process your data to fulfill and execute a contract and to meet legal obligations. Secondly, we may process your data also to further our legitimate interests, which are the offering of our services and operating and developing our business. Some personal data we may process based you your consent.

## **Who processes my personal data and is it transferred to anyone else?**

Primarily your personal data is processed by people within our own organization. We may also outsource some parts of the processing to third parties, such as data systems used to store personal data. In these situations, we make sure with contracts and otherwise that the confidentiality of your personal data is secured and data is otherwise processed lawfully.

When we are in a contractual relationship with a corporate customer for a recruiting project, we may give your personal data with your consent to such customer in the scope as required in the project. We may also disclose information to fulfill our other contractual or legal obligations or when a legal authority requires a disclosure. We may also disclose your personal data if we are a party of a business sale, such as a merger or an acquisition.

## **Is my data transferred outside the EU?**

By default, your data is not transferred outside the EU. Possible transfers would concern only such situations, where some of the servers where our data is stored would be located outside of the EU. If this would happen, we would make sure that your data is transferred and processed in a legal manner with adequate safeguards.

## **How long is my data stored?**

We will not store your personal data for longer period than is necessary for its purpose or required by contract or law. The storage times for personal data may vary based on its purpose and the situation. For instance, if you have applied for a publicly open position (a job advertised on website or a newspaper), we will not store your data for other future positions, unless you consent to it. If you have provided your personal data for direct searches, we store your data as long as it is accurate and up to date and you are on the employment market, unless you request that we delete your data. We will not store such data at all, which are not relevant for our business purposes. We also intend to keep your data up to date, so for this purpose we are glad to accept your updated resume, if you want to send it to us from time to time.

## **How is my data stored and kept secure?**

Your data is stored on the servers provided by our service providers, which are secured according to general industry standards and practices. We consider and keep your personal data confidential and do not disclose them to anyone else than those who need it for their work or confidentially to our customers based on contracts we have made with them. Access to your personal data has been protected with user-specific logins, passwords and user rights.

## **Is it mandatory to provide personal data? What happens if I don't give it to you?**

If you don't provide us some of your personal data or allow processing of it, it is very likely that we cannot serve you and fulfill the purpose of our business. If you don't want us to process your data, we ask you to not provide us any personal data.

## **Does your website use cookies and what are those?**

We use cookies on our website to provide the best possible user experience for our website visitors. Cookies are small text files that are placed on a web user's computer and are designed to hold a modest amount of data particular to a user and a website. Cookies give us information how users use our website. We may use cookies to develop our website and services, analyze website use as well as target and optimize marketing efforts. If you do not

wish to receive cookies, you may set your web browser to disable them. Please note that most browsers accept cookies automatically. If you disable cookies, you should understand that certain services at our website may not function correctly.

## **What rights do I have relating my personal data?**

### Withdraw your consent

If we process personal data based on your consent, you can at anytime withdraw your consent by notifying us, for instance by sending email to jaana(dot)toppari(at)topco(dot)fi.

### Access to data

You have the right to have confirmed if we are processing your personal data and also to know what data we have about you. In addition, you have right to some supplemental information described in the law about the processing activities.

### Right to have errors corrected

You have the right to request that we correct any inaccurate or outdated personal data we have about you.

### Right to prohibit direct marketing

You have the right to request that your personal data is not processed for direct marketing purposes by sending us email to jaana(dot)toppari(at)topco(dot)fi.

### Right to object processing

If we process your personal data based on public interest or our legitimate interest, you have the right to object processing of your data, to the extent that there is no such significant other reason that would override your rights or the processing is not necessary for handling legal claims. Please notice that in this situation we may not be able to serve you anymore.

### Right to restrict processing

In certain situations you have the right to require that we restrict processing of your personal data.

### Right to data portability

If we process your personal data based on your consent or fulfilling of a contract, you have the right to require transfer of the data you have provided to us to another services provider in a commonly used electronic format.

## **How can I use my rights?**

You can execute and use your rights by contacting us, for instance by sending email to jaana(dot)toppari(at)topco(dot)fi. In such case, we ask you to provide us your name, contact details, phone number as well as a copy of valid personal ID, such as a drivers license or passport, so we can verify your identity. If you consider that the processing of your personal data is not lawful, you can always also make a notification to a supervisory authority.

## **Can this privacy policy be updated?**

We may make updates to this privacy policy when our operations change or develop. Also changes in law may make it necessary to update this privacy policy. The changes become valid once we have published them in the form of an updated privacy policy. Therefore, please visit this page and read this privacy policy from time to time.

## **Who can I contact in privacy matters?**

Contact details:

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