



PRIVACY NOTICE FOR JOB APPLICANTS, GRM-SERVICES OY LTD

GRM-services Ltd is committed to ensure the confidentiality and data protection of the personal data possessed by the company, and to comply with the applicable data protection legislation. This Privacy Notice explains how GRM-services Ltd collects, processes and discloses personal data in connection with the job application and recruitment process. This Privacy Notice will be updated, when necessary, for example, when legislation changes.

1. Data controller

GRM-services Oy Ltd, Katriinantie 3 D 29, 01740 VANTAA, Business ID 2738190-7

2. Contact person

Antti Kivinen, antti.kivinen@grm-services.fi, puh +358 40 539 4224

3. Name of the register

Job Applicants Register of GRM-services Oy Ltd

4. The purpose and legal basis of processing personal data

We process personal data of job applicants to manage the recruitment process, such as processing job applications, informing applicants about the progress of the recruitment process, conducting interviews, and assessing professional or personal suitability. The information is needed to find a suitable candidate for a vacant position in GRM-services Ltd or to find a suitable person for another recruitment need. Applications may be open applications or targeted to a specific vacancy.

The legal basis for processing personal data is

- our legitimate interest, which is based on the need to process personal data for recruitment purposes
- consent of the job applicant, which can be requested for example in the following situations:
 - collecting personal data from referees
 - processing personal data in aptitude assessments
 - processing personal data when executing medical tests.

In certain circumstances and to the extent permitted by applicable law, we may also process personal data for the purpose of conducting a background check or background investigation based on the consent of the job applicant.

5. Content of the register and data collection

In principle, GRM-services Oy Ltd collects all personal data of the job applicant from the job applicant himself/herself. To the extent permitted by applicable legislation, we may also collect personal data from other sources, primarily with the consent of the job applicant.

We collect and process such personal data of job applicants that is necessary or indispensable for the processing of job applications and the recruitment process, such as:

- basic information, e.g., name, home address, e-mail address, telephone number, date of birth;
- the information included in the job application and related documents, e.g., photograph, educational background, previous work experience, qualifications, other skills and competences, language skills, salary requirements and references;
- the information relevant to the recruitment process, such as information on the applicant's progress in the recruitment process, notes taken on the applicant to support the recruitment decision, information on any aptitude tests and information on the selection for the position applied for; and
- other information that the applicant has provided us voluntarily in connection with the recruitment process or information we have separately collected based on the applicant's consent.

If the job applicant would be working in a position where s/he would have access to confidential information, or if there are other specific reasons to establish the confidentiality of the job applicant, personal credit data referred to in Chapter 4 of the Credit Information Act (527/2007), or criminal record or other register data collected in a limited security clearance under the Security Clearance Act (726/2014), may be processed with the consent of the job applicant.

6. Transfers and disclosures of personal data

We may disclose personal data to third parties

- to the extent permitted and required by law;
- when our partners process personal data on our behalf and in accordance with our instructions (e.g., occupational health care).

During the recruitment process, GRM-services Oy Ltd may also use outsourced recruitment partners who act on behalf of GRM-services Ltd and under the instructions of GRM-services Oy Ltd, e.g., to conduct aptitude assessments or in connection with the outsourcing of the recruitment process.

When processing the personal data, the data may also be transferred by the controller outside the EU or EEA to entities (e.g., cloud services) that are committed to comply with the requirements of the General Data Protection Regulation in such ways that ensure adequate data protection of the personal data.

7. Storage time of the personal data

The data collected in the register will be kept only for as long as necessary to fulfil the purposes specified in this Privacy Notice. As a rule, personal data is stored for the duration of the recruitment process. Any hard copies will be destroyed immediately after the recruitment process is completed. For any enquiries and requests made after the recruitment process, the personal data of job applicants will be kept in electronic format for one (1) year after the recruitment decision.

If a job applicant is selected for a position, GRM-services Oy Ltd will transfer the data collected during the recruitment process to GRM-services Ltd's personnel register.

8. Principles for protecting the register

The register is processed with due care and the personal data processed in information systems are adequately protected. Personal data will be processed only by those persons involved in the different stages of the recruitment process, e.g., the recruiting supervisor and his/her supervisor.



Access to digital material is only possible with the personal username and password of the authorized employee. Hard copies are stored in a locked cabinets or space accessible only to persons involved in the recruitment process.

When the personal data is stored on Internet servers, the physical and digital security of the hardware is adequately ensured. GRM-services Oy Ltd will ensure that the stored data, as well as server maintenance identifiers and other information critical to the security of the service, are handled confidentially and only by those employees whose job description includes this.

9. Your rights as a data subject

Your rights are guaranteed according to the EU General Data Protection Regulation:

- You have the right to inspect your personal data. You may also at any time request the rectification, updating or erasure of your personal data within the limits and in accordance with applicable data protection legislation. Please note, however, that personal data that is necessary for the purposes of this Privacy Notice or that is required to be retained by law cannot be deleted.
- You have the right to request restriction of processing or to object to the processing of your personal data within the limits and in accordance with the applicable data protection legislation.
- You have the right to data portability, i.e. to receive personal data about you in a structured and commonly used format and to transfer it to another controller, within the limits and in accordance with the applicable data protection legislation.
- When we process your personal data based on consent, you have the right to withdraw your consent at any time. We will then not process the personal data unless there is another legal basis for the processing.
- You have the right to lodge a complaint with a supervisory authority if you believe that GRM-services Oy's processing of your personal data is in breach of data protection legislation.

10. Contacts and requests

All contacts and requests concerning this Privacy Notice should be made in writing or in person to the contact person mentioned in section 2 above.