

# Recruitment

## Privacy Notice

### Controller

LINK Design and Development Oy (Business ID 2251285-9)  
Tekniikantie 12, Innopoli 1  
02150 Espoo

### Contact person for matters concerning the register

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### Register

Recruitment

### Date of preparation

24 November 2020

### Legal basis for processing

Consent

### Purpose of the processing of personal data

Recruitment needs and the processing of job applications, as well as enabling the employment relationships of the company's personnel, the payment of salaries and comparable measures.

The basis for processing is a legal obligation.

### Basis for legitimate interest

Job applicants and employees can reasonably expect that their personal data will be processed for the purposes described above, and the processing is justified on the basis of a balancing of the interests of the controller and the data subject, since the effect of the processing on the data subject is favorable (processing of personal data in connection with recruitment) and measures have been taken in relation to the processing to safeguard the interests of the data subject (for example, ensuring information security).

### Categories of personal data concerned

The data is obtained from the data subject. The controller may process the following personal data of job applicants that is directly necessary for the commencement of an

employment relationship and that relates to possible recruitment into an employment relationship within the controller's organization:

Basic information, such as:

- First names and surname, email address
- The job application and other information included in the job application process, such as language skills and information on education and qualifications
- Information provided by the data subject in their CV
- Any video interview and the information provided in it
- Information collected for personality and aptitude assessments
- Information provided by referees named by the job applicant
- Information relating to the progress of the recruitment process and any shortlisting
- The start and end dates of the employment relationship
- The employment contract and the terms it contains, such as monetary salary and other forms of remuneration and benefits

### **Recipients and categories of recipients**

The controller's own personnel.

The controller may disclose personal data to third parties if this is necessary for technical reasons relating to the service and/or if applicable legislation requires such disclosure.

The processing of personal data has been outsourced to the following service providers, which process personal data on behalf of the controller:

- Suppliers of HR administration IT systems
- Suppliers of storage services
- Recruitment consultants
- Suppliers of aptitude assessments
- Suppliers of video interview services

In addition, the controller may disclose data to the competent authorities in order to fulfill its statutory obligations. In such cases, the data is disclosed under appropriate contractual arrangements in accordance with the requirements of the General Data Protection Regulation and applicable legislation.

### **Data content of the register**

The personal data register contains the following data:

- First names and surname, email address
- The job application and other information included in the job application process, such as language skills and information on education and qualifications
- Information provided by the data subject in their CV
- Any video interview and the information provided in it

- Information collected for personality and aptitude assessments
- Information provided by referees named by the job applicant
- Information relating to the progress of the recruitment process and any shortlisting
- The start and end dates of the employment relationship
- The employment contract and the terms it contains, such as monetary salary and other forms of remuneration and benefits
- Bank account

The name and contact details of an employee's next of kin may also be recorded in the register if the job so requires.

### **Regular sources of data**

The data in the register is obtained from the data subject.

Data may also be collected from the data subject's referees and/or from a recruitment consultant.

With the data subject's consent, the controller may also collect personal data from other sources, except in the case of credit information or criminal record data used to assess an employee's reliability, for which consent is not required.

### **Retention period of personal data**

12 months, after which the data is securely destroyed.

### **Regular disclosures of data**

The data in the register is not disclosed to third parties unless this is necessary for the maintenance of the employment relationship or the payment of salaries.

### **Transfers of data outside the EU or EEA**

The data in the register is not disclosed outside the EU or the EEA.

### **Principles of register security A: Manual material**

Employment contracts and job applications are kept in a locked cabinet to which only the persons concerned have access.

All other material relating to the register exists only in electronic form, and the data is processed only electronically. Access to the data in the register is granted only to those persons, and only to the extent, required for recruitment or for handling other matters relating to the employment relationship. The register is stored on a secure server located in Finland.

### **Principles of register security B: Electronic material**

Access to the data in the register is granted only to those persons, and only to the extent, required for recruitment, the direction and supervision of work, payroll or the handling of

other matters relating to the employment relationship. The register is stored on a secure server located in Finland.

The protection and processing of the data in the register comply with the provisions and principles of the Data Protection Act, the regulations of the authorities and good data processing practice.

## **Cookies**

We use cookies on our website. A cookie is a small text file that is sent to and stored on the user's computer. Cookies do not damage users' computers or files. The primary purpose of using cookies is to improve and personalize the visitor's experience on the website and to analyze and improve the functionality and content of the website.

Information collected by means of cookies may also be used to target communications and marketing and to optimize marketing measures. A visitor cannot be identified by means of cookies alone. Information obtained through cookies may, however, be combined with information that the user may have provided in another context, for example when completing a form on our website.

The following information is collected by means of cookies:

- the visitor's IP address
- the time of the visit
- the pages viewed and the time spent on each page
- the visitor's browser

## **Your rights**

A user visiting our website may at any time prevent the use of cookies by changing their browser settings. Most browsers allow the cookie function to be disabled and cookies that have already been stored to be deleted.

Blocking the use of cookies may affect the functionality of the website.

## **GOOGLE ANALYTICS**

Usage statistics are collected from the website into the Google Analytics service for the purpose of monitoring and developing the website and planning marketing. The data collected cannot be used to identify an individual user or person.

In addition, the website uses the collection of audience and interest data (Google Analytics Demographics), which records information about the user such as age, gender and areas of interest. You can change the settings relating to the collection of this data in your own Google account at <https://www.google.com/settings/ads>

If you wish, you can opt out of Google Analytics tracking, for example by using a browser add-on for Chrome.

## **Right of access to personal data**

The data subject has the right to check what data concerning them is held in the register. A request for access must be made in writing by contacting the company's customer service or the contact person for the register, in Finnish or in English. The request for access must be signed.

The data subject has the right to prohibit the processing and disclosure of their data for the purposes of direct advertising, distance selling and direct marketing, as well as market research and opinion polls, by contacting the company's customer service point.

## **Right to data portability**

If the data subject has provided their personal data to the controller themselves, the data subject has the right to receive that personal data and the right to transmit that data to another controller, if:

- the processing is carried out by automated means; and
- the processing is based either on the data subject's consent, or

the processing of the data subject's personal data is necessary for the performance of a contract, for example an employment contract, or in order to take steps at the request of the data subject prior to entering into a contract.

The data subject does not have the right to data portability if the personal data in question is processed on the basis of the controller's legitimate interest or a legal obligation.

## **Right to rectification**

Any personal data in the register that is inaccurate, unnecessary, incomplete or outdated for the purposes of the processing must be rectified, erased or completed.

A request for rectification must be submitted in writing, personally signed by the data subject, to the company's customer service or to the administrator of the personal data register.

The request must specify which data is to be rectified and on what grounds. Rectification will be carried out without undue delay.

The rectification of an error will be notified to the party from whom the inaccurate data was obtained or to whom the data has been disclosed. If a request for rectification is refused, the person responsible for the register will issue a written certificate stating the reasons for the refusal. The person concerned may refer the refusal to the Data Protection Ombudsman for a decision.

## **Right to restriction of processing**

The data subject has the right to request the restriction of the processing of their personal data, inter alia in the following situations:

- the data subject contests the accuracy of the data

- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead
- the controller no longer needs the personal data for the purposes of the processing, but the data subject requires it for the establishment, exercise or defense of legal claims
- the data subject has objected to the processing of the personal data.

### **Right to object**

The data subject has the right to object, on grounds relating to their particular situation, at any time to the processing of personal data concerning them which is based on certain provisions of Article 6, including profiling. The controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or if the processing is necessary for the establishment, exercise or defense of legal claims.

Where personal data is processed for direct marketing purposes, the data subject has the right to object at any time to the processing of personal data concerning them for such marketing, including profiling to the extent that it is related to such direct marketing.

### **Right to lodge a complaint with a supervisory authority**

If you consider that the processing of personal data concerning you infringes the General Data Protection Regulation, you have the right to lodge a complaint with a supervisory authority.

You may also lodge the complaint in the Member State of your habitual residence or place of work.

### **Other rights relating to the processing of personal data**

The data subject has the right to prohibit the disclosure and processing of their data for the purposes of direct advertising and other marketing, to request the anonymization of their data where applicable, and the right to be forgotten after the end of the employment relationship. The data subject may request the controller to erase the personal data concerning them, inter alia in the following situations:

- the data is no longer needed for the purposes for which it was collected or otherwise processed,
- the data subject withdraws consent and there is no other legal basis for the processing,
- the personal data has been processed unlawfully;
- the personal data has to be erased for compliance with a legal obligation to which the controller is subject; or
- the data subject objects to processing based on the controller's legitimate interest.