

DESCRIPTION OF THE COMPANY'S JOB APPLICANT DATA FILE

1 Controller

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("we", "us", "our" or "Martela")

2 Data file contact

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3 Name of data file

JOB APPLICANT DATA FILE

4 What are the legal grounds for and purpose of processing personal data?

Purpose of processing personal data

- Compliance with the controller's and data subjects' obligations and special rights in the field of employment law;
- Explicit consent given by the data subject to the processing of their personal data.

The purposes of processing personal data include measures related to our recruitment process, the management of our recruitment process, support for ensuring sufficient personnel resources and the management of job applicants' (data subjects') data related to the application process for the purpose of communicating with the applicants, as well as decision-making related to filling open positions.

5 What data do we process?

Regarding the job applicant data file, we process the following personal data:

- **The data subject's basic data** such as their name*, date of birth*, user ID and/or other identifier, password, gender and preferred language;
- **The data subject's contact information** such as their private email address*, private telephone number* and home address*;

- **The data subject's information that is related to the job they applied for**, such as information about the job, including the form and quality of the employment relationship, as well as information about the person in charge of the job application process, salary request and information related to starting work. More specific information is provided in the job advertisement;
- **Other information that the data subject has provided about themselves and their back-ground to the controller in conjunction with the job application process**, such as their photo-graph, information related to their education and training, information concerning their profession and employment history (e.g. employers, start dates and durations of employment relationships and the types of jobs), information about their language skills and other special skills, a description of their personal qualities, certificates and assessments, and links to online portfolios, profiles and other sources of information, as well as other references;
- **Information concerning the progress of the data subject's recruitment process**, such as in-formation about any forthcoming interviews or information about the discontinuation of the recruitment process;
- **Any other information that the data subject has voluntarily provided** to the controller in con-junction with the recruitment process or that the data subject has otherwise expressly published in a professional context, such as their LinkedIn profile, or information separately collected by the controller with consent from the data subject.

The data marked with an asterisk is required for us to be able to proceed with the job application process.

6 Where do we obtain information?

The data to be stored in the data file is primarily provided by the job applicant. We use other sources of information to the extent permitted by law. We use recruitment consultants when necessary.

By submitting their job application, the applicant gives consent to the collection of data related to their public profile to the extent that is necessary and that is related to job performance concerning the open position in question.

7 To whom do we disclose data? Do we transfer data to non-EU or non-EEA countries?

We process the data ourselves. In addition, based on content given by the job applicant, information stored in the data file is disclosed to other companies within the Group, to match job applicants with employers.

We do not regularly disclose data to external parties.

In some cases, we may disclose data about the job applicant to a company that is carrying out aptitude assessments for us with regard to the open position in question.

We process data ourselves and use subcontractors to process data on our behalf. Martela Corporation and its subsidiaries, Martela AB, Martela Sp.z o.o, Kidex Oy and Grundell Oy serve as processors of personal data with regard to the system we use and HR support services. In the processing of personal data, we use subcontractors with regard to the following services:

- HR and recruitment services
- Legal services
- IT system suppliers.

We ensure data protection through data processing agreements with our subcontractors. As we cannot specify all of our subcontractors because of projects under development, for example, we have decided to specify the types of subcontractors that we use.

We do not disclose data from the data file to third parties other than those mentioned above, unless we have separately requested and received permission from the data subject to do so.

We do not transfer personal data to non-EU or non-EEA countries.

8 How do we protect data? For how long do we store data?

Access to the system containing personal data is only provided to employees who have the right to process customer data as part of their work. Each user has their specific user ID and password to the system. The data is collected into databases protected by means of firewalls, passwords and other technical measures. The people processing data are under a non-disclosure obligation concerning the data they receive. The databases and their backup copies are located in locked facilities, and the data can only be accessed by predetermined people. Data stored in paper format is kept in locked facilities and can only be accessed by people who have the right to process the data as part of their work.

We store personal data for as long as is necessary for its purpose of use. As a rule, data can be used for job application purposes for six (6) months. The data is destroyed within two (2) years. If a job applicant becomes one of our employees, we will store the data they provided as a job applicant, as well as the data related to the job application process, as part of their employee profile in accordance with the description of our employee data file. We regularly assess the necessity of storing data, taking the applicable laws into account. In addition, we take reasonable measures to ensure that information is not stored about the data subjects in the data file that is inconsistent with the purpose of use or is outdated or inaccurate. We will correct or delete any such information without delay.

9 What are your rights as a data subject?

As a data subject, you have the right to review the data stored about you in the personal data file and demand that erroneous data be corrected or deleted, provided that legal grounds exist for doing so. You also have the right to withdraw or change your consent.

As a data subject, in accordance with the EU General Data Protection Regulation (as of 25 May 2018), you have the right to object to the processing of your personal data or request that the processing of your personal data be restricted, and to file a complaint with the supervisory authorities concerning the processing of your personal data.

In addition, for special personal reasons, you have the right to object to profiling and/or other processing measures when the processing of data is based on a recruitment relationship between you and us. When making your demand, you must specify the special circumstance under which you are objecting to the processing of your personal data. We may refuse to implement your demand only on legal grounds.

As a data subject, you are also at any time entitled to object to the processing of your personal data, including profiling, to the extent that it is related to direct marketing.

10 Who can you contact?

All enquiries and requests concerning this data file description must be made in writing or in person to the contact person specified in Section 2.