

## Employee Privacy Notice

The Privacy Notice was updated on 21 June 2022

### 1 Introduction

It is important to us at Tribedo that you can trust us to process your personal data carefully, transparently and with care for your privacy. When processing your personal data, we strictly adhere to the General Data Protection Regulation (GDPR) and other data protection laws, and we always strive to operate in accordance with good data protection practices. This Privacy Notice describes how we collect, process, and protect the personal data of our job applicants during recruitment.

### 2 Processed personal data and purposes of processing

We collect and use your personal data only for the following, separately specified purposes. Below, you can also find a list of different personal data categories that are processed for each purpose. Some of the processed personal data can be categorised into special categories of data.

#### Applicant assessment

- Name and contact information
- Email address
- Information stated in the job application and CV
- Language skills, education, and other information related to skills and competencies
- Desires and preferences related to employment, such as working area, type of position, type of employment, and line of business
  - Information collected during the recruitment process, such as video interviews, interview notes, recruiter assessments, the progress of the process, and references
  - Possible aptitude and personality tests

#### Maintaining the community of practice

- Name and contact information
- Email address
- Occupational title
- Information stated in previous job applications and CVs
- Language skills, education, and other information related to skills and competencies
- Desires and preferences related to employment, such as working area, type of position, type of employment, and line of business
  - Information collected during possible recruitment process, such as video interviews, interview notes, recruiter assessments, the progress of the process, and references
  - Possible aptitude and personality tests

#### Job creation and employment contract preparation

- Personal identity code
- Account number
- Details of close family members
- Gender
- Nationality
- Work permit, if necessary

- Possible credit information checks, security clearances, and drug screening test results

### 3 Legal bases for processing personal data

Data protection legislation requires that all processing of personal data is based on a legal basis provided by the General Data Protection Regulation. We process your personal data based on the following legal bases:

#### Legitimate interest

Legitimate interest serves as the legal basis for processing personal data related to the processing of the job application and the applicant's suitability assessment. When a legitimate interest is used as a basis for processing, we carefully assess and weigh the existence and significance of the interest as required by data protection legislation and ensure that the processing does not cause unreasonable harm or risk.

#### Consent

In certain situations, we process your personal data only if we receive your explicit consent in advance. Personal data is processed based on consent, for example, for a community of practice. If you consent to storing the information collected for the community of practice during the recruitment, we can invite you to take part in new suitable recruitment opportunities or offer you vacancies that directly match your skills and desires.

#### Legal obligation

The processing of personal data may be based on an obligation set by law. For example, performing a security clearance or ensuring competence for certain tasks may be based on a legal obligation.

### 4 Sources of personal data

Personal data is mainly collected from you during the recruitment process. In situations specifically defined by law, we may also collect information from external sources, such as registers maintained by authorities. Personal data can be collected from external sources, for example, if the job requires a security clearance or a credit history check. In such cases, you will be informed in advance about the personal data processing and, if necessary, your consent will be asked in advance before carrying out the investigation.

### 5 Disclosure and transfer of personal data

We process your information confidentially, and we do not, for example, sell, rent or otherwise unnecessarily disclose your personal data to third parties.

#### 5.1 Disclosure of personal data

Disclosure refers to an operation where the controller (in this case Tribedo) gives personal data to a third party, and this third party uses it for its own purposes – not on behalf of Tribedo. Personal data can be disclosed to Tribedo's customer company or owner companies (Bravedo and OP Groups) in connection with recruitment or an assignment to the extent required to carry out the recruitment.

#### 5.2 Transfer of personal data

The transfer of personal data refers to a situation where the controller gives personal data to a third party for processing to be carried out on behalf of the controller. For example, outsourcing a processing procedure, such as assessing suitability, to another company usually requires transfer of personal data.

The data we collect can be transferred outside the EU/EEA if the used service provider is located or processes the data outside the EU/EEA. Our service providers are contracted to ensure that an appropriate level of data protection is guaranteed in all processing of your personal data.

## 6 Protecting personal data

We protect your personal data from loss, unauthorised access, and other misuse with appropriate technical and organisational data security measures. Such methods include using firewalls, encryption technologies, backup copies, and secure data centres. Access to your personal data is internally limited by electronic and physical access control, as well as by policies regarding the granting and monitoring of access rights to different systems. Your personal data may be read and processed only by those employees who have the right to do so within the scope of their duties.

## 7 Automated decision-making

Automatic decision refers to a decision that is made completely automatically (for example by an algorithm) without human involvement in decision-making. The processing of your personal data does not include automated decision-making.

## 8 Storage periods for personal data

We only keep your personal data for as long as it is necessary to fulfil the purposes defined for the processing, unless a longer storage period is required by law.

Personal data related to the recruitment process is generally stored for 24 months from the moment the application is saved. In certain situations, personal data can be stored for longer periods of time. In these cases, a separate consent for longer storage period is requested from the data subject.

In the community of practice, personal data is generally stored for 24 months after joining or being added to the community of practice. At the end of this storage period, the person will be asked if they want to continue as a member of the community. The personal data processing for the community of practice continues based on the consent. Otherwise, personal data will automatically be erased after the storage period.

At the end of the storage period, the data is either erased or made unidentifiable by changing it irreversibly into a form, from which the individual person can no longer be identified.

## 9 Rights of data subjects

### 9.1 Right to obtain information about the processing of your personal data

You have the right to obtain information from us about the processing of your personal data in a concise and transparent format that is easy to understand, easily accessible, and expressed in clear and plain language. The objective of this notice is to ensure your right of access and to help you understand as thoroughly as possible how and why we process your personal data. If you still have unanswered questions after reading this notice, please contact us.

### 9.2 Right of access

You have the right to obtain a confirmation from us about which personal data we process about you. Therefore, you have the possibility to assess and confirm the lawfulness of the processing. You also

have the right to request and obtain a copy of personal data undergoing processing. Instructions on submitting a request for data can be found in chapter "Exercising your rights".

### 9.3 Right of data portability

In certain situations, you have the right to have the personal data you have provided to us transmitted directly to another controller in a commonly used and machine-readable format. This right exists when we process said data based on your consent or agreement and the processing is automatic (digital) in nature.

### 9.4 Right to rectify personal data

Our objective is to keep your personal data up to date and to erase or supplement incorrect, incomplete or inaccurate personal data without delay. You also have the right to demand that we rectify inaccurate or incorrect personal data about you, or that we supplement the data that is incomplete.

### 9.5 Right to restrict processing your data

Restriction of processing means that, in addition to storage, personal data subject to the restriction may only be processed

- with your consent
- for the establishment, exercise or defence of legal claims
- for the protection of the rights of another natural or legal person, or
- for reasons of important public interest of the Union or of a Member State.

The right exists in the following situations:

- you contest the accuracy of your personal data, in which case the processing will be restricted for a period enabling the accuracy of the personal data to be verified;
- the processing is unlawful, but you do not want to erase your data;
- we no longer need the personal data and would otherwise erase the data, but you require the data to establish, exercise or defend legal claims;
- you have objected to the personal data processing on the basis of the controller's legitimate interest pending the verification whether the interests of the controller override those of the data subject.

### 9.6 Right to object to the processing of your personal data

In certain situations, you have the right to object to the processing of your personal data, i.e. to request for the data not be processed at all. In situations where we process your personal data to perform a task carried out for reasons of public interest, to exercise official authority or to implement legitimate interests, you can object to the processing on grounds relating to your particular situation. In this case, data processing must be ceased, except if

- we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or
- the processing is necessary for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you can, however, always object to the processing of personal data without giving reasons. After you have objected, the data can no longer be processed for the purposes of direct marketing.

### 9.7 Right to erasure and to be forgotten

In certain situations, you have the right to “be forgotten”, i.e. to have some of the personal data we process completely erased. This is usually the case, for example, in a situation where the processing of personal data was based on consent and you withdraw your consent, if the processing of personal data was unlawful in the first place, or if the justifiably collected personal data is no longer needed for the original or other appropriate purpose (e.g. a statutory obligation to store data). If you want to remove your job application or applicant profile from our community of practice, you can do this at any time by logging in to the system yourself or by sending a request to our customer service.

#### 9.8 Right to withdraw consent

In situations where we process your data based on your explicit consent, you have the right to withdraw your consent at any time. If you withdraw your consent, the processing or storage of your personal data will no longer be continued, unless some other legal basis (such as a statutory obligation) requires the processing to continue. You can, for example, withdraw your consent to subscribe to the newsletter with the “cancel subscription” function in the message.

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

In addition to the rights mentioned above, you have the right to lodge a complaint with the supervisory authority if you believe that we are violating the data protection regulation when processing your personal data. You can lodge a complaint, for example, in a situation where your rights as a data subject described in this notice are not implemented properly. In Finland, the Office of the Data Protection Ombudsman acts as the data protection supervisory authority.

### 10 Exercising your rights

If you have questions regarding your rights mentioned above or want to check your personal data or otherwise exercise your rights, please contact us using the contact information at the end of this notice. Generally, exercising your rights is free of charge. In certain exceptional cases defined by law (for instance, if you request multiple copies of your personal data), we may ask you in advance for a payment corresponding to the costs of implementing the request. We will respond to all requests without undue delay (no later than within one month of receiving the request) and let you know what measures we have taken as a result of your request. If for some reason we have to refuse your request, we will also inform you of the refusal and the reasons for it no later than one month after receiving the request. If there are many requests or they are complex, we may sometimes need additional time for processing (no more than two (2) months). In this case, we will inform you about the need and reasons for additional time no later than one (1) month after the request is made. If you want to lodge a complaint with the supervisory authority, you can find more information on the website of the Office of the Data Protection Ombudsman.

### 11 Controller and contact details

The controller is a body that determines how and why personal data is processed. Tribedo determines the purposes and means of personal data processing itself, and is therefore the controller of this personal data.

The controller’s contact details:

Tribedo Oy  
Business ID 1537114-6  
Päijänteentie 14 A, 6th floor, 00510 Helsinki

Enquiries regarding data protection:  
[tribedo.tuki@op.fi](mailto:tribedo.tuki@op.fi)

#### Notice updates

We are constantly developing our data protection practices, which is why we may make changes to this Privacy Notice from time to time. Changes may also be derived from changes in legislation. We recommend that you revisit this Privacy Notice page from time to time to follow up on any changes. If necessary, we can also notify you of any changes directly.

