

# PRIVACY STATEMENT

EU General Data Protection Regulation (2016/679),  
Articles 12-14

Updated: 2024-06-18

This privacy statement describes the processing of Aidian Oy's job applicants' personal data in Finland. We may update or change this privacy policy at any time and, if required by law, we will notify the data subjects thereof.

<b>1. Data controller and/or joint controller</b>	Aidian Oy Koivu-Mankkaan tie 6 B FI-02200 Espoo Finland Tel. +358 10 309 300 Business ID: 1855216-1
<b>2. Person responsible for register matters and/or contact person</b>	<b>Contact person responsible for register matters:</b> Sini Ruotsalainen, <a href="mailto:sini.ruotsalainen@aidian.eu">sini.ruotsalainen@aidian.eu</a> , +358 503098071 Koivu-Mankkaan tie 6B, 02200 Espoo  <b>Data Protection Officer:</b> dataprotection@aidian.eu Koivu-Mankkaan tie 6B, 02200 Espoo
<b>3. Name of the register</b>	Aidian Oy's recruitment register
<b>4. Processing of personal data Purpose and legal basis</b>	<p>Personal data is processed for the selection procedure of new employees and trainees and for the implementation of internal mobility. This information allows us to contact applicants and make decisions when filling positions. If the jobseeker is selected for the position, the personal data provided by the jobseeker in the recruitment process will also be used in establishing an employment relationship and in tasks related to recruitment.</p> <p><b>Legal basis for processing personal data:</b></p> <ul style="list-style-type: none"><li>• <b>Legitimate interest of the controller (Article 6(1)(f) GDPR)</b><ul style="list-style-type: none"><li>○ The main basis for processing during the recruitment process.</li><li>○ The proportionality of the processing to the interests of the data subject has been verified on the basis of a balancing of interests.</li></ul></li><li>• <b>Contract (Article 6(1)(b) GDPR)</b><ul style="list-style-type: none"><li>○ When drawing up an employment contract with the selected job applicant.</li></ul></li><li>• <b>Consent (Article 6(1)(a) of the GDPR)</b><ul style="list-style-type: none"><li>○ When information about a jobseeker is collected, for example, from jobseeker references.</li><li>○ In addition, we may ask for the job applicant's consent to the storage of their data after the recruitment process so that we can utilise the data of the unselected job applicant in other possible open positions.</li></ul></li></ul>
<b>5. Data content of the register</b>	<p>The register may contain the following categories of data when their processing is necessary:</p> <ul style="list-style-type: none"><li>- Basic personal information (first and last name, email, phone number)</li><li>- Information concerning job search (e.g. information on education, work experience, language skills and competence, driving licence information)</li><li>- Job application, curriculum vitae and any other attachments provided by the applicant and the information they contain</li><li>- Possible video interviews and the information provided</li></ul>

	<ul style="list-style-type: none"> <li>- Information on references provided by the job applicant (with the specific consent of the jobseeker)</li> <li>- If necessary, information related to the personal and aptitude assessment (with the separate consent of the job applicant)</li> <li>- If necessary, information related to the security clearance (with the specific consent of the job applicant)</li> <li>- Information about the recruitment process (such as information about a follow-up interview or interruption of the recruitment process)</li> <li>- Notes taken during the recruitment process</li> <li>- Any other information that the jobseeker has voluntarily provided in connection with the job application process</li> </ul> <p>The jobseeker can decide what information to provide, but refusing to provide some of the above information or not consenting to the assessment process or security clearance, which is a prerequisite for the position being applied for, may in some circumstances mean that the recruitment process cannot proceed with the candidate because the candidate's suitability for the job cannot be properly assessed.</p>
<b>6. Sources of information</b>	<p>As a rule, the job applicant itself submits the personal data processed in the recruitment process to the controller. With the job applicant's consent, information necessary for recruitment can also be obtained from other sources of information, such as job applicant's references.</p>
<b>7. Disclosures and recipients of data</b>	<p>The processing of personal data has been outsourced to the following service providers who process personal data on behalf of the controller:</p> <ul style="list-style-type: none"> <li>- For recruitment system provider</li> <li>- For storage providers</li> <li>- For recruitment consultants</li> <li>- For suitability assessment suppliers</li> </ul> <p>In addition, Aidian may, if necessary, disclose data to competent authorities in order to fulfil legal obligations.</p> <p>We may use international cloud services in the processing of personal data, in connection with which data may be transferred outside the EU/EEA. In these situations, transfers comply with the requirements and protection measures set by the EU General Data Protection Regulation.</p>
<b>8. Protection of personal data transferred</b>	<p>Possible transfer of data outside EU/EEA complies with the requirements set by the General Data Protection Regulation. In the absence of a comprehensive adequacy decision by the Commission covering the country of destination, standard contractual clauses drawn up for international data transfers approved by the Commission at any given time may be used, while ensuring appropriate safeguards.</p>
<b>9. Retention period of personal data</b>	<p>Personal data is stored for as long as it is necessary for the purposes of processing personal data or for compliance with the controller's legal obligations. The retention periods take into account, for example, the claim periods permitted by law and the employer's obligations. As a rule, the controller stores personal data concerning recruitment for a maximum of 24 months.</p> <p>The controller will delete the data when the purpose for storing it no longer exists.</p>
<b>10. Principles of register protection</b>	<p>Personal data is protected by appropriate technical and organisational measures against unauthorised processing and access.</p> <p><b>Manual material:</b> Manual material is stored in a locked space that can only be accessed by authorised persons who have committed to confidentiality.</p> <p><b>Electronically stored data:</b> The protection of the register utilises technical data protection (several security mechanisms, such as access control, firewalls, password arrangements) and electronically stored data can only be accessed by authorised persons who have committed to confidentiality. In addition, organisational safeguards are used, such as appropriate personnel training and instructions on data protection.</p>

<p><b>11. Rights of the data subject</b></p>	<p>The data subject has the following rights described in this section, which the data subject can exercise by contacting the controller using the contact details in section 2. Please note that the applicability and scope of your rights will be specified on a case-by-case basis in accordance with the EU General Data Protection Regulation and that in all cases you do not have the rights mentioned below. In addition, Aidian Oy may need to request some additional information about the requestor in order for us to verify the identity of the requestor.</p> <ul style="list-style-type: none"> <li>• <b>Withdrawal of consent</b> <ul style="list-style-type: none"> <li>○ If the processing of personal data is based on consent, the data subject has the right to withdraw his or her consent at any time. The withdrawal of consent is made by written request to the controller.</li> </ul> </li> <li>• <b>Right of access to personal data</b> <ul style="list-style-type: none"> <li>○ The data subject has the right to request from the controller access to personal data concerning him or her and the right to receive a copy of such data.</li> </ul> </li> <li>• <b>Right to rectification</b> <ul style="list-style-type: none"> <li>○ The data subject has the right to request the rectification, completion or erasure of incorrect, incomplete or outdated data processed about him/her.</li> </ul> </li> <li>• <b>Right to erasure</b> <ul style="list-style-type: none"> <li>○ The data subject has the right to obtain from the controller the erasure of personal data concerning the data subject if certain conditions are met, e.g. when the personal data are no longer needed for the purposes for which they were collected or when the processing was based on consent and consent has been withdrawn.</li> </ul> </li> <li>• <b>Right to restriction of processing</b> <ul style="list-style-type: none"> <li>○ You have the right to restrict the processing of your personal data in certain situations, such as if you contest the accuracy of your personal data.</li> </ul> </li> <li>• <b>Right to data portability</b> <ul style="list-style-type: none"> <li>○ The data subject has the right to transfer data from one system to another when the processing has been based on consent and it has been carried out automatically.</li> </ul> </li> <li>• <b>Right to object to processing</b> <ul style="list-style-type: none"> <li>○ The data subject has the right to object, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her based on the controller's legitimate interest.</li> </ul> </li> <li>• <b>Right not to be subject to automated decision-making</b> <ul style="list-style-type: none"> <li>○ Personal data in the recruitment register is not subject to automated decision-making.</li> <li>○ However, we can use the recruitment system's artificial intelligence, for example, to compile summaries of notes. Artificial intelligence is only used to support the recruitment process, decisions and choices are always made by the person responsible for recruitment.</li> </ul> </li> <li>• <b>Right to lodge a complaint with a supervisory authority</b> <ul style="list-style-type: none"> <li>○ Without prejudice to other administrative or judicial remedies, every data subject has the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data concerning him or her infringes the EU General Data Protection Regulation. Up-to-date information on the supervisory authority (Data Protection Ombudsman) in Finland: <a href="https://tietosuoja.fi/etusivu">https://tietosuoja.fi/etusivu</a>.</li> </ul> </li> </ul>
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