

POLTTIMO GROUP PRIVACY NOTICE FOR JOB APPLICANTS

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1. Data controller

The data controller of your personal data is Polttimo Oy and its affiliated group companies i.e. Viking Malt and Senson (“Polttimo Group” or “we”). Polttimo Group is fully committed to protecting your personal data when using or processing them and recognize the importance of correct and lawful treatment of personal data.

2. Contact details

Polttimo Group, HR Department, Niemenkatu 18, FI-15140 Lahti, Finland

Privacy@polttimo.com

3. What is the purpose and legal basis for processing your personal data?

Polttimo Group process your personal data as a job applicant for the following purposes:

- To manage your job application(s) via online career portal of Polttimo Groups
- Screen, assess and evaluate all educational and professional information and relevant background information in a view of a potential recruitment.
- Prepare an employment contract in case of a positive evaluation and decision to hire.

The legal basis for processing data is:

- Our legitimate interest, which is based on the need to process personal data for recruitment purposes and which is formed of the connection between us
- Your consent, which can be requested e.g. in the following situations:

- Collecting personal data from references
- Processing personal data in personality or aptitude assessments
- Processing personal data when executing medical tests.

4. How long we store your data?

We store personal data for only as long as it is necessary due to the purpose of use. When sending an open application the retention time of your application is 24 months. If you participate in a recruitment process your data is destroyed in two years after the end of the recruitment process. If you become our employee, we store the data you have provided as a job applicant and the information related to the recruitment process as a part of your HR profile according to our privacy notice regarding our employee register.

We evaluate the need to store data regularly considering the applicable legislation. In addition, we take care of such reasonable measures which ensure that no incompatible, outdated or inaccurate personal data, taking into account the purpose of the processing, is stored in the register. We correct or erase such data without delay.

5. What data do we process?

Polttimo Group collects following personal data from you as a job applicant:

- **Basic information and contact details** such as name, date of birth, language, country of residence, email address, postal address, phone number
- **Information regarding suitability that you have provided us in connection with the recruitment process and other information of yourself, your background etc.** such as information regarding study and education, occupation, information regarding work history (i.e. employers, starting date and duration of employment and nature of the duties), language skills, other special skills and competence, description of personal features, different kinds of certificates and evaluations and references to the portfolios, profiles and other sources on the Internet and references and personality and aptitude assessments performed based on your consent and information regarding them
- **Information regarding the proceeding of the recruitment process** such as information of following interviews or the interruption of the recruitment process
- **Other possible information that you have provided us voluntarily** in connection with the recruitment process or specifically published for professional purposes such as a LinkedIn profile or information we have separately collected based on your consent.

6. From where do we receive information?

Primarily, the register contains data entered by you as a job applicant. Other information includes data related to the recruitment process or received from sources of information provided by you. Other sources of information are used within the limits allowed by the applicable regulation. We may use recruitment consultants if needed.

7. To whom do we disclose or transfer data, and do we transfer data outside the EU or EEA?

We process data ourselves and use subcontractors working on our behalf for processing personal data e.g. services related recruitment, data and IT management. We have ensured the protection of your data by making data processing agreements with the subcontractors.

Subsidiaries of Polttimo Oy i.e. Viking Malt, Senson process personal data of job applicants only to extent it is required to recruit for the concerned subsidiary. Data may be disclosed to outsiders only in conformance with applicable legislation. Personal data is not transferred to countries outside the EU or EEA.

8. How do we protect the data?

Only those of our employees, who on behalf of their work have the right to process personal data, are entitled to use the systems containing personal data. Each user has a personal username and password. The data is collected into databases, that are secured with firewalls, passwords and other technical measures. The persons processing data are bound by professional secrecy. The databases and their backups are in locked premises secured by access control and camera surveillance and can be accessed only by certain pre-designated persons.

Physical material is printed only when needed. Paper printouts are destroyed immediately after use.

9. What are your rights as a data subject?

You can contact us if you need any support while applying or managing your personal data. Additionally, you have the right to contact us if you wish to:

- Access, correct or delete your personal data
- Insofar as the processing is based on your consent, you also have the right to withdraw your consent or receive your data in order to transfer data to another data controller (right to data portability). Withdrawing your consent does not affect the lawfulness of processing based on consent before its withdrawal
- Restrict or object the processing of your personal data.

Additionally, you have a right to lodge a complaint with the supervisory authority concerned in the EU Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes applicable data protection regulation.

10. Whom can I contact?

The contacts and requests concerning this privacy notice must be submitted in writing using the contact details mentioned in section 2.