

## Privacy Policy

21<sup>st</sup> March 2025

### 1. Controller

Sponda Ltd (business ID: 0866692-3)  
Yrjönkatu 29 C, P.O. box 940, FI-00101 Helsinki  
tel. +358 (0)20 43131

### 2. Contact person for register matters

Sponda Ltd  
Yrjönkatu 29 C, P.O. box 940, FI-00101 Helsinki  
tel. +358 (0)20 43131  
e-mail: [privacy@sponda.fi](mailto:privacy@sponda.fi)

### 3. Name of the register

Job applicant register

### 4. Purpose and legal basis of the processing of personal data

The legal basis for the processing of personal data is the data subject's consent and/or legitimate interest. If the processing of personal data is based on legitimate interest, the controller's legitimate interest is the need to recruit employees.

The processing tasks may be outsourced to external service providers, in accordance with and within the limits set by data protection law.

### 5. Data content of the register

The following data of data subjects can be saved:

- personal information (name, date of birth, contact information)
- vacant position
- applicant's wishes regarding the employment tasks and the employment relationship
- education and experience information
- competency information
- other information gathered and processed during the recruitment process

### 6. Storage period of personal data

The controller will store the personal and employment data six (6) months after the job applicant has filed the job application.

### 7. Regular sources of data

Majority of the data will be received from the job applicant. In addition, the data may be received from the referees provided by the job applicant.

### **8. Regular disclosure of data and recipient categories**

Personal data may be disclosed between the group companies of the controller. Personal data may be disclosed in connection with the sale, transfer or other disposal of a site or business.

Personal data may be disclosed to the controller's and/or its group company's service providers.

Personal data may be disclosed to competent authorities, for example, in order to identify misuse and in order to help them carry out their statutory duties.

### **9. Transfer of data outside the EU or the EEA**

Personal data may be transferred outside the European Union or the European Economic Area in accordance with and within the limits of data protection law.

The controller, the controller's subcontractors or partners may use companies that are located outside the EU or the EEA to assist in the processing of personal data, or they may use workforce or other resources that are located outside the EU or the EEA for processing personal data. It is also possible that a co-operation partner selected by the controller to which the controller decides to transfer data is located outside the European Union or the European Economic Area, for example, in the United States. The legislation of non-EU/EEA countries does not necessarily provide the same level of protection for personal data as the European Union. However, the controller tries to ensure the protection of personal data in these cases by using the safeguards required under data protection law, such as the standard contractual clauses of the European Commission.

### **10. Protection principles of the register**

#### Manual material

Any manual materials are stored in a locked room that only authorised persons can access.

#### Electronically processed data

Electronic materials are appropriately protected from outsiders using firewalls and other technical measures. Only designated employees of the controller have the right to process the data stored in the register.

The aim of the measures described above is to safeguard the confidentiality, availability and integrity of the personal data stored in the register and to permit the exercise of the data subject's rights.

### **11. Automatic decision-making**

Personal data is not used for automatic decision-making that would have legal or other similar effects on data subjects.

### **12. Right to object to the processing of one's personal data**

Where the grounds for the processing of personal data is the legitimate interest of the controller, the data subject has the right to object to the profiling or other processing of any personal data relating to their particular situation.

The data subject may object to the processing of their personal data by submitting a request, as described in section 15 of this privacy policy. In the request, the data subject must specify the particular situation on the basis of which they object to the processing. The controller may refuse to satisfy the request under the criteria set out in legislation.

### **13. Right to object to direct marketing**

The data subject may give their consent or refusal to direct marketing to the controller channel-specifically, and the content or refusal also covers profiling for direct marketing purposes.

### **14. Other rights of the data subject related to the processing of personal data**

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

The data subject has the right to access their personal data in the register. The access request must be made following the instructions set out in this privacy policy. The right of access can be refused on the grounds provided in legislation. In principle, exercising the right of access is free of charge.

#### **Right to request rectification or erasure of personal data or restriction of processing**

The data subject must, without undue delay and after noticing or becoming aware of the mistake, rectify, erase or complement any data in the register that violates the purpose of the register, is incorrect, unnecessary, incomplete or outdated, if the data subject can do this him- or herself.

If the data subject cannot rectify the data, the rectification request must be submitted as described in section 15 of this privacy policy.

In addition, the data subject has the right to request the controller to restrict the processing of their personal data, for example, while the data subject is waiting for the controller's response to the rectification or erasure request.

#### **Right to move data between systems**

Insofar as the data subject has submitted data to the register that is processed on the basis of the data subject's consent, the data subject has the right to receive such data in a form that is readable by a computer and to move them to another controller's system.

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

The data subject has the right to lodge a complaint with a competent supervisory authority if the controller has not complied with applicable data protection regulations in its operations.

#### **Other rights**

If the legal basis for the processing of personal data is the data subject's consent, the data subject is entitled to withdraw their consent by notifying the controller, as described in section 15 of this privacy policy.

**15. Contacts**

The data subject should contact the controller if they have any questions concerning the processing of personal data and the exercise of their rights. The data subject may exercise this right by sending a request to the controller via e-mail to [privacy@sponda.fi](mailto:privacy@sponda.fi) or by mail to Sponda Ltd, Yrjönkatu 29 C, P.O. Box 940, FI00101 Helsinki.