

## **ROBIT PLC PRIVACY NOTICE**

### **JOB APPLICANTS**

Last updated 25 May 2018

#### **1 INTRODUCTION**

This document describes how Robit Plc (hereinafter "**Robit**") and its staff process the personal data of job applicants applying to Robit. Robit acts as a controller to such personal data.

As a controller, we are responsible for the personal data of job applicants, and for the processing of such personal data. Protecting your privacy and your personal data is of utmost importance to Robit. We are committed to complying with the requirements of data protection regulation applicable to us in the processing of your personal data. The means and purposes of processing the personal data of job applicants are described in more detail in this Privacy Notice.

What is stated in this Privacy Notice, applies, where appropriate, to the processing of personal data conducted by Robit group companies.

#### **2 DATA CONTROLLER**

Robit Plc  
(Business ID: 0825627-0)  
Viikkiniityntie 9  
33880 Lempäälä  
Tel.: +358 3 3140 3400

##### **Contact Person**

Jaana Rinne  
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Email: jaana.rinne@robitgroup.com

#### **3 LEGAL BASES FOR PROCESSING AND PROCESSING PURPOSES**

The EU General Data Protection Regulation (EU) 2016/679 ("**GDPR**") applies to all processing of job applicants' personal data as a general law. Furthermore, certain provisions of the Finnish Act on Protection of Privacy in Working Life (759/2004) apply.

Processing of personal data must always be based on a legal basis set forth in the GDPR. Processing of employees' data is based on the following legal bases:

- processing is necessary in order to take steps at the request of the data subject prior to entering into an employment contract
- Legal obligation to which Robit is subject
- Data subject's consent under applicable legislation
- Legitimate interest of Robit. A legitimate interest may be, for instance, ensuring and improving data security or the security of premises and data network; preventing and investigating suspected fraud or misuse; and protection of Robit's property.

Personal data of job applicants is processed in particular for the following purposes:

- (i) Recruiting; receiving and processing applications;
- (ii) Conducting personal and aptitude assessments;

- (iii) Maintaining a CV database;
- (iv) Informing the candidates whether they were selected to the position or not, as well as other communications between the job applicant and Robit.

#### 4 CATEGORIES OF PERSONAL DATA PROCESSED BY ROBIT

Robit may process the following personal data directly necessary for the processing purposes mentioned above. These necessary personal data can be categorised as follows:

Basic information, such as

- Name of the applicant
- Personal identity number
- Contact details (such as address, telephone number and email address)

Information relating to suitability to the position, such as

- Information on work experience, qualification data and information relating to education
- Results of personal and aptitude assessment or other suitability assessment data. Those candidates that are, on the basis of the first interview, suitable for the position, may be required to participate to a personal and aptitude assessment. A person who is to be evaluated is always provided with a copy of the statement given.

Other information obtained from the job applicant, such as

- Job application and possible appendices of the application

Other information accumulated during the recruitment, such as

- Notes made by the interviewers
- Communications between the job applicant and Robit

Data collected through technical monitoring, such as

- Data collected from the job applicant's use of Robit's recruitment systems
- data relating to camera surveillance and other electronic surveillance recordings

In addition to the categories of personal data presented above, Robit may process special categories of personal data or personal data that is otherwise sensitive as follows:

- **Drug test certificate or data included in it** to the extent permitted in applicable legislation in order to establish the employee's performance and ability to work.

#### 5 REGULAR SOURCES OF PERSONAL DATA

According to the principal rule set forth in the Act on Protection of Privacy in Working Life, data relating to employees shall primarily be collected from the job applicant him/herself. In addition, data is collected also from other permitted sources, such as from data systems to which personal data of the applicant is recorded in connection with the job applicant's use such data system.

#### 6 TRANSFERS AND DISCLOSURES OF PERSONAL DATA

Robit may transfer job applicant's personal data to third parties in the following manner in order to fulfil the processing purposes described in this Privacy Notice. When personal data are transferred to an entity which processes personal data on behalf of Robit (i.e. data processor) Robit has through contractual arrangements ensured that personal data is processed only in accordance with Robit's written instructions and only for the purposes described in this document and

that access to personal data is restricted to persons who need access to data based on their tasks.

- Data processors: Robit may transfer personal data to processors in order for the processors to perform services and tasks assigned to them. Data processors' tasks relate, for instance, to payroll management, offering and managing of devices, data systems and software as well as offering other data processing services.

Some of the data processors used by Robit are located outside the EU or EEA area. Robit has contractually ensured that these entities undertake to apply an appropriate level of data protection in their processing practices, and thus the data transfers are subject to appropriate safeguards. More information on cross border transfers of the employee personal data and on the appropriate safeguards applied thereto from time to time is available from the contact person mentioned under Section 2 of this document.

In certain cases Robit may share job applicants' personal data to the companies belonging to the same group of companies with Robit to the extent necessary for the purposes of recruitment.

Robit discloses personal data for instance to authorities and Robit's service providers within the limits allowed or required in currently applicable legislation.

## 7 DATA RETENTION PERIOD

Robit retains the personal data of the job applicants in accordance with the applicable legislation only for as long as the retention of data is necessary for processing purposes specified in this Privacy Notice. When Robit no longer needs personal data for the specified purposes, the data will be deleted from the data systems of Robit as well as from other files.

The general maximum retention period of personal data of job applicants is one year from the relevant recruitment decision, based on the limitation period for raising discrimination change under the Gender Equality Act (609/1986).

## 8 RIGHTS OF THE DATA SUBJECT

The General Data Protection Regulation provides the data subject with several rights based on which the data subject can in many situation himself/herself decide on the processing of his/her personal data. The data subject may use the following rights with regard to Robit to the extent Robit acts as the controller to the personal data of the data subject in question.

- Right of access: The data subject has the right to obtain a confirmation from the controller on whether the controller processes personal data concerning the data subject and the right to access such data. The data controller may ask the data subject to specify his/her access request, amongst others, with regard to the details of the data to be delivered.
- Right to rectification: The data subject has the right to obtain from the controller the rectification of inaccurate personal data concerning him/her processed by the controller, or to have incomplete personal data processed by the controller to be completed.
- Right to be forgotten: The data subject has the right to obtain from controller the erasure of personal data related to him/her and the controller has the obligation to erase such data in case there is no longer a legal ground for the processing of such data or, where the legal or contractual obligation binding the controller related to the storing of the personal data has ended or, where the data subject has withdrawn his/her consent to the processing of his/her personal data.
- Restriction of processing: In certain cases, where so prescribed by law, the data subject may have the right to obtain from the controller restriction of processing of his/her personal data.

- Right to data portability: The data subject may, subject to certain conditions prescribed by law, have the right to receive the personal data concerning him/her processed by the controller in a commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance from the original controller.
- Right to object to processing of his/her personal data: In certain cases, the data subject may have the right to object to processing of personal data concerning him or her. The right to object is applicable in such situations in particular where the processing of personal data is based on the controller's legitimate interest. In such situations the controller has to follow the data subject's request, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
- To the extent the processing of personal data has been based on the data subject's consent, the data subject has, at any time, the right to withdraw his/her consent regarding the processing.

The requests shall be directed to the contact person mentioned in section 2 of this document.

In addition, the data subject has the right to lodge a complaint with the supervisory authority on the processing of the personal data by the controller. The complaint shall be made to the competent supervisory authority, in Finland to the Data Protection Ombudsman, in accordance with its instructions. The web-site of the Data Protection Ombudsman can be found [here](#).

## **9 CHANGES TO THIS PRIVACY NOTICE**

Robit may, from time to time, change this Privacy Notice. You can tell when changes have been made to the Privacy Policy by referring to the "Last Updated" legend at the top of this webpage. Robit encourages you to review this document regularly for any changes.