

PRIVACY NOTICE – Recruitment

CapMan Plc (and the companies belonging to the same company group, hereinafter jointly referred as "CapMan") is committed to keeping all personal data it collects and processes safe and secure and to inform the data subjects promptly of all its data processing activities and on the rights which data subjects have.

This Privacy Notice is one of CapMan's 4 public Privacy Notices. It answers the following questions:

- *What kind of personal data does CapMan collect and process?*
- *Why does CapMan collect and process personal data?*
- *What are CapMan's information sources?*
- *How and with whom may the personal data be shared?*
- *How long is the retention time?*
- *What are the rights of the data subject?*
- *Who to contact?*
- *How does CapMan secure personal data?*

This is a Privacy Notice, which aims to provide information regarding the processing of personal data at CapMan in connection to CapMan's Employees and Management. Please note that the data controller within CapMan may also be one of CapMan's subsidiaries and as a result, the data subject may have a data controller – data subject relationship with one of the subsidiaries.

In this Privacy Notice, the data subjects, which are hereinafter jointly referred to as "**Data Subjects**", may be:

- Persons who have sought employment at CapMan by applying for a position.
- Persons who have sought employment at CapMan by sending an open application.
- Persons who headhunters have presented to CapMan.

1. What kind of personal data does CapMan collect and process?

Basic Information

Basic contact information of all Data Subjects such as name, date of birth, social security number, address, email address, telephone number.



Education and work history

Personal data enclosed in the Data Subject's curriculum vitae, application letter and/or LinkedIn profile including e.g. education, work history & experience, training courses participated and completed, hobbies.

Information on employee assessments

Results of the pre-employment testing, notes from the job interviews and reference checks and credit reference details.

2. Why does CapMan collect and process the personal data?

Recruitment decisions

CapMan processes personal data for the purpose of assessing the job candidates, making recruitment decisions and managing the employee relationships as well as decision-making in relation to employment relationships. Processing for this purpose is based on either the Data Subject's consent or a legitimate interest of CapMan pursuant to the Employment Contracts Act or corresponding legislation in another country where CapMan operates.

3. What are CapMan's information sources?

Personal data is mainly collected from the Data Subject himself/herself, headhunters, employee assessment companies, publicly available information or other sources such as credit rating bureaus.

If data is collected in other ways e.g. by third party interview (reference check), it is always done after requesting a pre-approval from the data subject.

The information sources may vary depending the domicile and/or the citizenship of the Data Subject.

4. How and with whom may the personal data be shared?

CapMan may share personal data with others (e.g. third parties) such as the public authorities, suppliers and service providers, who may, due to such sharing and depending on the situation in question, act as a data processor or become a controller of personal data.

CapMan may fulfil above mentioned transfer of personal data only under a contractual obligation or a legislative obligation to do so and only if it is necessary for processing personal data systematically and effectively or for complying with legal obligations, protecting CapMan's and/or



the Data Subjects' safety or the safety of others, investigating fraud, or responding to a government request.

Personal data may also be shared with:

- **business partners and third party service providers** such as headhunters and employee assessment service companies. CapMan only shares information which is necessary to share in order to fulfill its legal obligations.
- **trusted IT service providers** such as HR Software systems, for the purposes of systematic and organised handling of personal data. However, at all times, these trusted service providers act on CapMan's behalf and CapMan is responsible for the processing of personal data;
- **competent public authorities** when permitted or required in order to comply with applicable mandatory laws or rules of a stock exchange, by order of a court or a request, which is made by a competent authority with legal rights to access such information.

Transfer of personal data to third countries

Personal data may also be transferred to countries outside of the EU or EEA ("third countries"), but only during exceptional circumstances. Such transfer is conditional to the EU Commission has assessing that the level of data protection is adequate in the target country, there are necessary standard contractual clauses in place to safeguard the transfer and/or the transfer is specifically agreed upon with the Data Subject.

CapMan also operates in Russia and, for this reason, certain personal data of job applicants or other Data Subjects can be transferred to the CapMan Russia team.

5. How long is the retention time?

The basic rules for retention are that data is retained only for as long as necessary to fulfil the purpose of processing or as long as it is required by law.

Basic personal data will be retained until a limitation period (one calendar year in Finland) has lapsed from the date when CapMan previously had interaction with the Data Subject or in other ways handled the personal information of the Data Subject.

Please note that the data retention times may differ since they are subject to local law.

6. What are the rights of the Data Subject?

A Data Subject is entitled to have access to personal data concerning him or her in the register, managed by CapMan, and to request CapMan to correct, update or remove personal data at any



time. To the extent required by applicable data protection law, a Data Subject has a right to object or restrict data processing and request data portability, i.e. the right to receive the personal data in a structured, commonly used machine-readable format and transmit the personal data to another controller.

Data Subjects should acknowledge that certain information is strictly necessary for the performance of a contract or for compliance with a legal obligation of CapMan, which may restrict the Data Subject's rights listed above. In case the data processing is based on the consent given by the Data Subject, the Data Subject may at any time contact CapMan and cancel the consent for processing personal data, e.g. opt-out of receiving marketing messages.

6. Who to contact?

Controller and Controller's representative

Name: CapMan Plc

Business ID: 0922445-7

Address: Ludviginkatu 6, 00130 Helsinki

Phone: +358 207 207 500

Name: Antti Kiviluoto

Title: IT Director

Email: antti.kiviluoto@capman.com

Phone: +358 207 207 564

Competent authority

If the Data Subject finds violation to his or her legal rights, he or she has the right to file a complaint with the national Data Protection Authority or another Data Protection Authority within the EU or the EEA.

The Data Protection Ombudsman acts as the supervising authority in Finland. You can find the contact information of the Data Protection Ombudsman through this [link](#). Please send any requests regarding the above-mentioned rights to the contact person at CapMan whose contact details can be found above.

