

PRIVACY NOTICE – Recruitment

CapMan Plc (and the companies belonging to the same group, hereinafter jointly referred to 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 of the rights of the data subjects.

CapMan has several privacy notices for different purposes. This Privacy Notice 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 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?*

The purpose of this Privacy Notice is to provide data subjects with information regarding the processing of personal data at CapMan in connection with recruitment processes. Please note that the data controller within CapMan may also be one of CapMan's group companies and, as a result, the data subject may have a data controller – data subject relationship with one of the group companies instead of CapMan Plc.

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 information and contact details of the Data Subjects such as name, date of birth, address, email address, telephone number and social security number.

Education and work history



Personal data the Data Subject has disclosed in his/her curriculum vitae, application letter and/or LinkedIn profile including e.g. education, work history & experience, training courses participated and completed as well as hobbies.

Information on employee assessments

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

2. Why does CapMan collect and process personal data?

Recruitment decisions and employee relationship management

CapMan processes personal data for the purposes of assessing the job candidates, making recruitment decisions and managing and making decisions with regards to the employee relationships. The processing in connection with the foregoing is based on either the consent of the Data Subject or a legitimate interest of CapMan. The legitimate interest might be based on, for example, 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. Additional information sources might include headhunters, employee assessment companies and other relevant sources, such as credit rating bureaus in case of a credit reference check.

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

The information sources might vary depending on 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 third parties, such as public authorities, suppliers and service providers, who may, due to such sharing of personal data and depending on the situation in question, act as data processors or become controllers of the personal data.

CapMan may transfer personal data to third parties under a contractual obligation or a legislative obligation or in connection with the fulfillment of its legitimate interests set out in this Privacy Policy, 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 be shared with:

- **trusted business partners and third-party service providers** such as headhunters and employee assessment service companies. The sharing is always subject to a contract between CapMan and the service provider/business partner and is conducted in order to fulfill CapMan's legitimate interests set out in this Privacy Policy,
- **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 be transferred to countries outside of the EU or EEA ("third countries") only during exceptional circumstances. Such transfer may only be conducted if (i) the EU Commission has concluded that the level of data protection in the target country is adequate for safeguarding the transferred personal data; (ii) there are necessary standard contractual clauses in place to safeguard the transfer; and/or (iii) 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 under certain circumstances be transferred to the CapMan Russia team.

5. How long is the retention time?

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

Basic personal data of the Data Subject will be retained until a limitation period (one calendar year in Finland) has lapsed from the date CapMan last has had interaction with the Data Subject or has in other legitimate ways handled the personal data of the Data Subject. Please note that the data retention times may differ since they are subject to local laws and regulations.

6. What are the rights of the Data Subject?



Data Subject is entitled to have access to his/her personal data 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, Data Subject has a right to prohibit or restrict data processing and request data portability, i.e. request the transfer of their own personal data in a structured, commonly used machine-readable format to themselves or the transmit of 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, and the foregoing might set limitations to 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 revoke 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 his/her legal rights violated, the Data Subject 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 rights of the Data Subject to the contact person at CapMan (details set out above).

