

PRIVACY NOTICE – Recruitment

Previous update: January 2022

We at CapMan respect the privacy of all our stakeholders. Our privacy notices describe how we process personal data in accordance with the EU's general data protection regulation ("**GDPR**").

This Privacy Notice applies to personal data of the individuals who seek to work for us either through application or through recruiting agencies ("**you**").



1. Data controllers

The controller of your personal data is CapMan Plc and/or one or more of its group companies. Each CapMan group company is responsible for the processing of personal data in its own activities for the purposes and on legal bases set out in this Privacy Notice and may use the necessary personal data collected by other group companies for the same purposes.

2. Contact

If you have questions regarding this Privacy Notice or wish to exercise your rights, you may contact:

CapMan Plc
Privacy Matters
Ludviginkatu 6, 00130 Helsinki
Email privacy@capman.com

3. What personal data do we collect and process?

We generally collect and process the following types of personal data:

- Contact details and identification data such as name, address, personal email, phone number, date of birth, gender, nationality, and other information necessary for identifying the applicant and verifying eligibility to work

- Social security number/ID number if necessary for instance due to credit check or security clearance and in order to enter into employment contract
- Documents provided by the job applicant such as cover letter, CV and certificates regarding work history, education, and skills
- Information related to applicant and referee interviews
- Information related to tests and applicant assessments
- Background check and credit information
- Other information the job applicant has provided us or given us consent to collect and process

Only such personal data is collected and processed which we believe is necessary considering the nature and type of the position you are applying for. If you do not wish to provide us with the requested personal data, we may not be able to consider you in the recruitment process. Some of the information such as social security number will only be collected and processed from the final candidate for the purpose of entering into employment contract, performing background checks and setting up the employee profile on the HR systems.

4. Why do we collect and process personal data?

We process personal data for the purposes of receiving and handling job applications, identifying and evaluating job candidates, making recruitment decisions, managing and making other decisions regarding employee relationships as well as recordkeeping related to recruitment and hiring. We may also process personal data to fulfil our statutory obligations and protecting our legal rights to the extent permitted by applicable laws. Such obligations may relate, for

instance, to demonstrating that the recruitment decisions have been non-discriminatory.

CapMan Plc maintains a centralized register for the group companies related to job applicants' personal data for the purposes of administration, planning and developing business activities. We process your personal data only to extent it is required for abovementioned purposes.

5. What is the legal basis for processing?

Under data protection law, we need to have lawful grounds for processing your personal data. Sometimes more than one lawful ground applies. The legal basis for processing your personal data for the abovementioned purposes is primarily our legitimate interest to ensure that we recruit appropriate employees, to manage our relationship with you and to evaluate and maintain the efficiency of our recruiting process. Data processing may also be based on our pre-contractual obligations relating to our potential employment relationship with you and our obligation to comply with applicable laws. We may also process personal data based on your consent (in case of, e.g. conducting background checks and collecting information from referees).

6. What are our information sources?

Your personal data is mainly collected from you through an electronic recruitment system, from an e-mail you send directly to us or to a recruitment agency, or through social media platforms (such as LinkedIn). Additional information sources include recruiting agencies, employee assessment consultants, your referees and credit rating

agencies. Information sources are used within the limits of the applicable laws, and your consent is requested when necessary. Information sources may vary depending on your and the hiring company's domicile and/or your citizenship.

7. How and with whom do we share personal data?

Your personal data is accessed by our HR professionals and by other persons who participate in the applicant evaluation and selection process at CapMan. Also, certain individuals performing administrative functions and IT personnel may have limited access to your personal data.

We may share your personal data between different entities within the Group. Further, we use various service providers to perform tasks related to recruitment and employment management and may transfer personal data to such third-party service providers. Such services may include, e.g. external recruitment consulting, candidate assessment and background checks, IT services related to HR software systems and general HR administration. On occasion we may also need to share personal data with public authorities.

Sometimes we may need to transfer personal data outside EU or EEA for instance because a service provider is in a third country. Such transfer would only be made (i) to a country in which the level of data protection is adequate for safeguarding the transferred personal data according to the EU Commission; (ii) using appropriate safeguards such as the EU Commission's standard contractual clauses in accordance with applicable data privacy laws and regulations; or (iii) if the transfer is specifically agreed upon with you.

8. How long is the personal data retained?

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, or for as long as necessary for the purposes of securing our rights and fulfilling our obligations and for handling possible claims.

We use a web-based recruitment system for handling job applications. If you send us an application for a specific open position, the retention time is 12 months from the end of relevant recruitment process. In case of an open application, the retention time is 12 months from receiving the application.

We do not accept e-mail applications but instead all applications will be directed to the recruitment system. In case you approach us by an e-mail, you will be directed to the recruitment system and the e-mail (and possible documents attached therein) will be deleted.

If you become our employee, we store the data you have provided us as a job applicant and the information related to the recruitment process as a part of your HR profile in accordance with our employee privacy notice. Please note that the data retention times may differ between countries since they are subject to local laws and regulations.

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.

9. How do we ensure that your personal data is safe with us?

We implement technical and organizational security measures to protect personal data from loss, misuse, unauthorized access, disclosure, alteration or destruction. Only specific personnel of CapMan and of our third-party service providers are given access to personal data, and these employees and third-party service providers are required to treat this information strictly confidential.

10. What are your rights?

You are entitled to obtain information of your personal data that we process and have access to or obtain a copy of such personal data. You are also entitled to request us to correct, update or remove your personal data. To the extent required by applicable data protection law, you have a right to prohibit or restrict data processing and request data portability, i.e. transfer of your personal data in a structured, commonly used machine-readable format to you or to another data controller.

You should be aware that certain information is strictly necessary for the performance of a contract or for compliance with our legal obligations, which may set limits to some of the rights listed above. In case the data processing is based on your consent, you may at any time contact us and revoke your consent. Withdrawal of consent does not affect the lawfulness of data processing before the withdrawal.

If you find your legal rights violated, you have the right to file a complaint with a competent authority. According to the GDPR you may

lodge complaint in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

Please send any requests regarding your rights to privacy@capman.com. We will answer to your request within one month of receipt of your request unless there are justified reasons to extend this time by two further months. If we cannot fulfil your request, e.g. due to our obligations, we will inform you in writing within the same time frame and explain to you the reasons why we are unable to

fulfil your request. You can lodge a complaint with the supervisory authority if you disagree with our decision.

11. Updates to Privacy Notice

We may amend this Privacy Notice from time to time.