

Updated September 1st 2023

#### PRIVACY STATEMENT

## Job applicant and employee candidate register

## General

In order to serve you to the best of our ability, we collect and process some information about you. However, we value your privacy and are committed to protecting it. This Privacy Statement contains information on which personal data we collect, on which principles we process it, as well as what rights and possibilities of influence you have regarding your data. The starting point of our data protection policy is that we do not collect or store information other than what is necessary to fulfill the assignment in progress at any given time.

Jaana Toppari Consulting Oy processes your personal data in accordance with this privacy statement and the applicable legislation, so we ask you to read this privacy statement carefully. We may also make updates to this privacy policy as our operations develop or legislation changes.

By using our services, website, or contacting us, you agree that we process your personal data in accordance with this privacy statement. If you don't accept these terms, we probably won't be able to serve you either.

# For what purpose is my personal data collected and processed?

The personal data in the database is used for Jaana Toppari Consulting Oy's consulting assignments.

The purpose of processing personal data is the implementation of contracts and assignments between Jaana Toppari Consulting Oy and the clients and candidates who use its services, as well as managing recruitment services.

We do not collect personal data based on a legitimate interest in our own database: The business of direct search companies is based on searching for suitable candidates in the market and introducing them to our clients who have open jobs and who want to use direct search to fill them. Due to their business, direct search companies have a legitimate interest in the processing of personal data, which is based on the relationship between candidates and direct search companies. We ourselves do not use legitimate interest but only collect project-specific CVs from the candidates themselves. Long-term and large-scale registration of data is against our principles.

We collect, store, and process your personal data only for predefined purposes. Purposes of use are:

- provide recruitment and direct search services, where we help our business customers find people suitable for open positions;
- performance of our contractual obligations;
- meeting legal obligations and claims;



- customer communication and responding to contact requests;
- developing our business.

The CVs given to us by the people involved in the respective projects will be deleted 9 months after the end of the search. CV information is only disclosed to our client with the candidate's consent; information is not disclosed elsewhere.

Jaana Toppari Consulting Oy can also collect information about the user's terminal device on its websites using cookies (" cookies ") and other similar technologies.

## What personal data is collected about me and from which sources?

We collect personal information about you only from you when you contact us or later during the search process when you send us your CV. With your consent, we can also collect information about you from referrers.

We only collect the following information per project:

- candidate's CV and application or cover text
- information given in the interview, interview notes
- a possible WOPI- and SHL-profile if it was made in connection with the search
- assignment summary, possibly client organization charts without names.

All the above information will be deleted 9 months after the end of the search.

Information collected from public sources:

• we do not collect information from public sources.

Other data processed with your consent:

contacts with former employers and recommenders.

# On what basis is personal data processed?

We make sure that we always have a legal basis for processing your personal data. We may process your personal data on several different grounds. We process your data to implement the contract and fulfill legal obligations.

# Who processes my data and is it passed on to third parties?

As a general rule, your personal data is processed by the personnel of our company when performing their duties. We may also outsource candidate mapping work and contacting candidates. In this case, we make sure with agreements that the confidentiality of your data is maintained and that the data is also otherwise processed in accordance with the law.

In the assignment relationship with our customers, we may hand over your personal data to our customers with your consent to the extent necessary for the implementation of the recruitment project. We may also disclose information otherwise to fulfill contractual obligations or when required by law or a competent authority. We may also disclose your information if we are involved in a business transaction.



## Will my data be transferred outside the EU?

Your personal data will not be transferred outside the EU. Possible transfers outside the EU only apply to situations where the servers of the systems we use are located outside the EU. If this were to happen, we will make sure that the processing, transfer, and storage of your data is carried out according to the grounds required by law and with sufficient protection mechanisms.

## How long will my personal data be kept?

We do not keep your personal data longer than is necessary for the purpose of their use, i.e. we delete your data after 9 months. Long-term and large-scale registration of data is against our principles.

## How is my data stored and protected?

Your data is stored on our service provider's servers, which are protected in accordance with the general practices of the industry. The personal information we collect and process is kept confidential and is not disclosed to anyone other than those who need it in their work, or confidentially and limitedly to our customers based on service contracts. Access to your personal data is protected with user-specific codes, passwords, and access rights.

# The obligation to provide information and the consequences of not providing it?

If you do not provide personal data or allow their processing, it is likely that we will not be able to serve you and fulfill the purpose of our activities. If you do not want us to process your data in accordance with this privacy statement, we ask that you do not provide us with any data.

# Are cookies used on the website and what are they?

We use cookies on our website so that we can offer the best possible user experience to the website visitor. Cookies are short text files that the web server stores on the user's terminal device. Cookies give us information about how users use our website. We may use cookies to develop our services and website, to analyze website usage, and to target and optimize marketing. The user of the website can give his consent or deny the use of cookies in the settings of his web browser. Most web browsers allow cookies automatically. Please note that blocking cookies may limit the functionality of our website.

# What rights and influence do I have?

## Withdrawal of consent

If we process your data based on your consent, you can withdraw your consent at any time by notifying us, for example by sending an email to Jaana (dot)toppari(at) Topco (dot)fi.

#### Access to information

You have the right to receive confirmation from us as to whether we are processing personal data concerning you and to know what personal data concerning you we are processing. In addition, you have the right to receive additional information about the basis of the processing of your personal data.



#### The right to have errors corrected

You have the right to request that we correct incorrect or outdated or otherwise incomplete personal data concerning you.

#### The right to prohibit direct marketing

You can prohibit the processing of your personal data for direct marketing purposes by sending an email to jaana(dot)toppari(at)topco(dot)fi.

#### The right to object to processing

If we process your personal data on the basis of the general interest or our legitimate interest, you have the right to object to the processing of your personal data to the extent that there is no substantial reason for the processing that would override your rights or the processing is not necessary to handle a legal claim. Please note that in this situation we probably won't be able to serve you anymore.

#### The right to restrict processing

In certain situations, you have the right to demand that we limit the processing of your personal data.

## The right to have the data transferred

If we have processed your data on the basis of your consent or to fulfill a contract, you have the right to receive the data you have provided us electronically in a commonly used format so that the data can be transferred to another service provider.

## How can I exercise my rights?

You can exercise your rights described above by contacting us, for example by sending an email to jaana(dot)toppari(at)topco(dot)fi. At the same time, we ask you to mention your name, address, and phone number, and to attach a copy of your passport, driver's license or other ID to your message, so that we can verify your identity. If you consider that the processing of your personal data is not in accordance with the law, you can also file a complaint with the competent supervisory authority.

# Can this privacy statement be updated?

We may make updates to this privacy statement when our operations or privacy principles change. Updates may also become relevant when the legislation changes. The changes will come into effect when we have published the updated privacy statement. That is why we ask you to familiarize yourself with the content of this data protection statement at regular intervals.

# Who can I contact regarding data protection matters?

Contact information: Jaana Toppari Consulting Oy Kuusmiehenpolku 10, 00670 Helsinki tel. +358 50 5719 621 jaana(dot)toppari(at)topco(dot)fi