

Name: **Privacy notice – HR recruitment**ID: **LQ-16**Version: **3.0**Author: **Amanda Laine**Published: **Feb 19, 2025 10:27:42 (UTC)**Approver: **Markus Vattulainen****PRIVACY POLICY / JOB APPLICANTS**

## 1. Data Controller and Contact Information

**Name of the Register:**

JOB APPLICANT REGISTER

**Data Controller:**

Aurevia Oy

0110079-1

Kumpulantie 15, 00520 Helsinki

09 8566 8200

info@aurevia.com

(hereinafter referred to as the "Company" or "Employer")

**Contact Person for Registry Matters:**

Kirsi Marin

Kumpulantie 15, 00520 Helsinki

tietosuoja@aurevia.com

## 2. General Information

This document describes the processing of personal data in Aurevia Oy's recruitment process for job applicants. This privacy policy provides the information required by the EU General Data Protection Regulation (679/2016) to the data subject and the supervisory authority.

## 3. Whose Data is Processed?

The register consists of the personal data of job applicants applying to Aurevia Oy, whose processing is necessary to assess the suitability of employees and to establish an employment contract between the job applicant and Aurevia.

## 4. Purpose and Legal Basis for Processing Personal Data

Processing of personal data is a necessary requirement for applying for open positions and thereby forming an employment contract. The legitimate interest of the data controller can be considered to be the identification of potential employees and the offering of jobs to applicants. The data controller ensures that processing based on legitimate interests is proportionate to the rights and expectations of the data subject.

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Personal data is used to assess the suitability of job applicants applying to Aurevia and to form a possible employment contract within the personnel management system. Data is processed only to the extent necessary for evaluating the applicant's suitability for the position they applied for or other open positions offered by Aurevia.

Aurevia may use the job applicant's personal data to directly contact them to offer suitable job opportunities.

### 5. Categories of Personal Data Processed

#### Job applicant

Category and Contents of Personal Data	Purpose of Data Processing	Legal Basis
Basic personal data: <ul style="list-style-type: none"> <li>• First and last name</li> <li>• Address</li> <li>• Phone number</li> <li>• Email address</li> </ul>	Identification and communication with the individual	Legitimate interest
Data Transferred to Employment Contract and Personnel Management System (Employee Record): <ul style="list-style-type: none"> <li>• First and last name</li> <li>• Address</li> <li>• Phone number</li> <li>• Email address</li> <li>• Date of birth</li> <li>• Personal identification number</li> <li>• Bank account number</li> <li>• Mobile subscription transfer details</li> </ul>	Establishing employment and creating a personal profile in the personnel management system	Consent  The data is necessary to establish an employment relationship in the company's personnel management system.
Job Application Details and Related Documents: <ul style="list-style-type: none"> <li>• Photo</li> <li>• Self-assessment of skills</li> <li>• Language proficiency</li> <li>• Nationality</li> <li>• Work permit</li> <li>• Work experience</li> <li>• Education</li> <li>• Licenses</li> <li>• Certificates and diplomas</li> <li>• Availability</li> <li>• Salary expectations</li> <li>• Other details mentioned in the CV</li> </ul>	Assessment of skills, suitability, and qualifications	Legitimate interest

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<b>Data Collected and Processed During the Recruitment Process:</b> <ul style="list-style-type: none"> <li>Information provided by the job applicant through the recruitment service (Talent Adore)</li> <li>Applicant's preferences regarding job roles and workplaces</li> <li>Applied job positions</li> <li>Personal data provided during job interviews</li> <li>Suitability assessments and references, if necessary</li> </ul>	<b>Assessment of skills, suitability, and qualifications</b>	<b>Legitimate interest</b>
<b>Other Supporting Recruitment Data:</b> <ul style="list-style-type: none"> <li>Information related to job applications from recruitment service providers or authorities</li> </ul>	<b>Assessment of skills, suitability, and qualifications</b>	<b>Consent</b>  The data controller informs the individual in advance about the acquisition of such data.
<b>Reliability and Background Checks:</b> <ul style="list-style-type: none"> <li>Credit information</li> <li>Criminal record information</li> <li>Security clearance</li> </ul>	<b>Legally mandated or permitted reliability assessments and background checks</b>	<b>Consent</b>  The data controller informs the individual in advance about the acquisition of such data concerning them for reliability assessment purposes.

### Transition from Job Applicant to Employee

<b>Categories and Contents of Personal Data</b>	<b>Purpose of Data Processing</b>	<b>Legal Basis</b>
<b>Data Transferred to Employment Contract and Personnel Management System (Employee Record):</b> <ul style="list-style-type: none"> <li>First and last name</li> <li>Address</li> <li>Phone number</li> <li>Email address</li> <li>Date of birth</li> <li>Personal identification number</li> <li>Bank account number</li> <li>Mobile subscription transfer details</li> </ul>	<b>Establishing employment and creating a personal profile in the personnel management system</b>	<b>Consent</b>  The data is necessary to establish an employment relationship in the company's personnel management system.

### 6. Automated Decision-Making and Profiling

If we use automated decision-making or profiling that has legal or significant consequences for you, we will inform you in advance. If such processing is not legally justified or necessary for fulfilling a contract, we will request your consent.

You can always express your opinion, dispute a decision based solely on automated processing, and request a manual decision-making process by contacting us using the contact details provided below.

### 7. How is Personal Data Collected?

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Personal data is primarily collected from the job applicant, who fills in the necessary information and uploads their CV into the recruitment system (Talent Adore).

Personal data may also be collected and updated with the job applicant's consent from other sources such as references, recruitment partners, or recruitment service providers and authorities.

Data may also be collected and updated without consent in cases permitted or required by law.

## 8. Recipients and Transfers of Data

Personal data is not disclosed to third parties without the applicant's consent. We ensure data protection with our subcontractors through necessary data processing agreements (DPA, Data Protection Agreement).

### Aurevia Employees

Recipient	Purpose of transfer of data
TalentAdore	Use of the Recruitment System
Recipients in accordance with Aurevia's personnel register	Establishing employment and creating a personal profile in the personnel management system

## 9. Retention Periods for Personal Data

Personal data is retained for two years from the last update. The job applicant consents to this by submitting their application to the Aurevia recruitment system (TalentAdore). The recruitment system has an automated deletion process for personal data. Job applicants can update their data by logging into the register using their personal password. They also have the right to access, restrict, correct, and delete their data.

## 10. Data Subject Rights

### Right of Access

The data subject has the right to obtain confirmation from the data controller as to whether their personal data is being processed or has been processed.

If the data controller processes the data subject's personal data, the data subject has the right to receive the information outlined in this document as well as a copy of the personal data being processed or that has been processed.

If the data subject submits a request electronically and has not requested another method of delivery, the information will be provided in a commonly used electronic format, provided that it can be delivered securely.

### Restriction, Rectification, and Erasure of Data

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The data subject has the right to request the data controller to rectify or erase their personal data. In certain situations, the data subject has the right to request restrictions on the processing of their personal data or to otherwise object to the processing. Additionally, the data subject may request the transfer of data they have provided in a machine-readable format in accordance with the General Data Protection Regulation (GDPR).

### **Withdrawal of Consent**

If the processing of personal data is based on the data subject's consent, the data subject has the right to withdraw their consent at any time.

### **Right to Object to Processing**

The data subject has the right to object to the processing of their personal data at any time on grounds relating to their particular situation when the processing is based on the legitimate interests of the data controller or a third party.

### **Complaints**

The data subject has the right to lodge a complaint with the supervisory authority if they believe that the processing of their personal data violates their rights under the GDPR.

## **11. How Can the Data Subject Exercise Their Rights?**

Requests regarding your rights must be submitted in writing to the contact details provided in this document. We strive to fulfill your request as soon as possible and respond within one month of receiving the request. If actions related to your request are delayed, we will inform you within a month and complete the requested actions within three months. If we cannot fulfill your request, we will notify you promptly of the reasons for refusal.

If you are dissatisfied with the measures taken regarding your rights or the processing of your personal data, you have the right to file a complaint with the data protection authority. In Finland the complaint can be made to the Office of the Data Protection Ombudsman <https://tietosuoja.fi/en/contact-information>.

## **12. Data Security and Processing**

Personal data is processed securely, and only authorized personnel, such as HR employees and managers, have access to it. The system containing personal data is protected by technical and organizational measures against loss, misuse, and unauthorized access.

We process personal data securely and in compliance with legal requirements. Only individuals who are authorized by their role to handle employee data have access to the system containing personal data. The register is protected by necessary technical and organizational measures to safeguard personal data from loss, misuse, or other unlawful access. The security of personal data processing is ensured through guidelines and instructions. Each user has a unique username and password for the system, and we utilize SSO authentication. Additionally, Aurevia will regularly conduct [a balance test](#), as defined by the data protection authority, to ensure that the interests of the data subject are considered in the processing.

## **13. Changes to the Privacy Policy**

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Aurevia continuously improves its services and reserves the right to modify this privacy policy. Changes may also be based on legislative updates. Job applicants are encouraged to review this privacy policy regularly.

Date of Preparation: April 3, 2024.