

## PRIVACY NOTICE FOR JOB APPLICANTS

Digital 14 Oy (KATIM) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we collect, process, and share your personal data when you apply for a job with us, and will tell you about your data protection rights.

This privacy notice is provided in a layered format. You can click through to the specific areas set out below.

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### 1. WHO IS DATA CONTROLLER?

The data controller for the processing described in this notice is:

Digital 14 Oy (KATIM).

If you have questions regarding this Privacy Notice, please contact us by email at [TalentAcquisitionInfo@digital14.com](mailto:TalentAcquisitionInfo@digital14.com).

### 2. DATA WE COLLECT AND HOW WE COLLECT IT

In the following, we will tell you which types of personal data we may collect about you and how we collect it. In section 3, you will find a table which explains the purposes for which we process your personal data and the lawful basis we rely on.

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- (A) **Identity Data** include name, date of birth, social security number and photo identification.
- (B) **Contact Data** include email, telephone number and address.
- (C) **CV Data** include the information you have included in your application and CV, e.g., documentation and information about your education, previous work experience, qualifications, and skills as well as any photos, videos or other recorded material which you at your own discretion choose to make available to us.
- (D) **References** include information obtained from previous employers at our request.
- (E) **Work Permits** include information on your passport and citizenship and, where needed, residence and work permit.
- (F) **Assessment Data** include your replies to aptitude, skills or personality tests.

The data is collected directly from you by your application, CV or other material made available to us before or during interviews. We also process personal data from candidate profiles you

are uploading to recruitment platforms. For certain roles we may apply the services of a recruitment agency which will provide information to us. Such recruitment agency may be a data controller on their own account, and you are encouraged to consult the recruitment agency's information on processing of personal data. References are taken only in agreement with you.

### 3. THE PURPOSES AND THE LAWFUL BASIS

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (i) To take steps prior to enter into a possible employment contract at your request when you submit your job application to us cf. Article 6(1)(b) GDPR.
- (ii) Where we need to comply with a legal or regulatory obligation cf. Article 6(1)(e) GDPR or, where necessary, for the establishment, exercise, or defence of a legal claim cf. Article 9(2)(f) GDPR.
- (iii) Where you have provided your consent cf. Article 6(1)(a) GDPR or Article 9(2)(a) GDPR.
- (iv) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests cf. Article 6(1)(f) GDPR.

In the table below we describe all the purposes for which we will use your personal data and the legal basis on which we process your personal data. Where appropriate, we have also identified our legitimate interests.

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
<p>To manage the recruitment process, including:</p> <ul style="list-style-type: none"> <li>• To receive and review job applications</li> <li>• To arrange and invite to interviews</li> <li>• To screen and evaluate candidates to choose the most appropriate candidate for the job</li> <li>• To inform applicants about the progress and outcome of the recruitment process</li> </ul>	<p>(A) Identity (B) Contact (C) CV</p>	<p>Processing is necessary to pursue our legitimate interest to manage recruitment processes and to evaluate job applicants for the purpose of finding appropriate candidates for jobs within our organisation.</p>

To manage the recruitment process, including: <ul style="list-style-type: none"> <li>To enter into employment contract with the chosen candidate</li> </ul>	(A) Identity (B) Contact (C) CV	Processing is necessary to take steps prior to entering into a possible employment contract at your request when you submit your job application to us.
To evaluate the candidates' qualifications and appropriateness for jobs by taking references	(D) References	Your consent
Aptitude tests may be used where necessary to assess relevant professional and personal skills and qualifications	(F) Test	Your consent
To confirm and document the candidate's residence and work permit	(E) Work Permits	To comply with our legal obligation under the Aliens Act to not employ individuals without necessary permits to reside and work in Finland.
To handle complaints related to the recruitment process	(A) Identity (B) Contact (C) CV (D) References (E) Work Permits (F) Test	Processing is necessary for the establishment, exercise or defence of a legal claim.

Where we have referred to our legitimate interest as the legal basis for the processing of personal data specified above, we have conducted a balancing test. The purpose of the balancing test is to ensure that our legitimate interest is not overridden by your interests or fundamental rights and freedoms. Please contact us by email at [TalentAcquisitionInfo@digital14.com](mailto:TalentAcquisitionInfo@digital14.com) if you wish to receive more information on the balancing test.

#### 4. SHARING OF DATA COLLECTED

We may disclose your personal data within the EDGE Group where required for the above specified purposes. We base this processing on our legitimate interest to transmit personal data within the EDGE Group for internal administrative purposes, such as for the purposes of using centralized IT systems and alignment of the EDGE Group HR administration, business operations and strategies.

We may disclose personal data to third parties:

- When it is necessary for the purposes listed in section 3.

- To public authorities when required by law.
- To any person or entity that acquires all or substantially all of our business, stock or assets, or with whom we merge.
- When we in good faith believe that disclosure is necessary to establish or exercise our legal rights or defend against legal claims, protect your safety or the safety of others, investigate fraud, or respond to a government request.

We share data, including personal data, with our trusted third-party service providers that process your data on our behalf and under our instruction. Such services include, e.g., hosting of data and maintenance of IT systems as well as hosting and maintaining recruitment portals and platforms, certain recruitment services, background check services, and assessment providers. These third-party service providers may have access to or process your personal data for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal data that we share with them for any other purpose than in connection with the services they provide to us. We enter into data processing agreements with our data processors.

## **5. TRANSFERS TO THIRD COUNTRIES**

We will not transfer your personal data to recipients outside the EU or EEA unless we have ensured compliance with Chapter V of the GDPR. Please note that some of our group companies are located outside of the EEA. As such, there are times when your personal data may be transferred to and processed in these locations. Rest assured, any transfer of your personal data outside of the EEA is carried out in compliance with applicable laws and regulations. We have put in place appropriate safeguards to ensure that your personal data is treated with the same level of protection as it would be within the EEA.

Some of our third-party service providers are established outside the EEA, so their processing of your personal data will involve transferring data outside the EEA. However, to ensure that your personal data receive an adequate level of protection, we have ascertained that sufficient safety measures have been implemented to allow for the transfer, including where the European Commission have deemed the country to provide an adequate level of protection for personal data, or by use of specific contracts approved by the European Commission (Standard Contractual Clauses) which give personal data essentially equivalent protection as it has in the EEA.

If you require further information about our data processors established outside the EEA and the safety measures in place to allow for the transfer of personal data, you can request it from us by sending your request to us by email at [TalentAcquisitionInfo@digital14.com](mailto:TalentAcquisitionInfo@digital14.com).

## **6. DATA RETENTION**

We retain the personal data we collect (Identity Data, Contact Data, CV Data, References, Work Permits, Test Data) where we have an ongoing legitimate need or obligation to do so. Where we are no longer obliged to keep your records and do not have an ongoing need to process your personal data, we will either delete or anonymise them.

In relation to applicants who are not offered employment, we will normally delete all data within 12 months from the decision not to offer employment. We will retain applicant data for longer periods if the applicant has consented.

For applicants who are hired, personal data will be retained in accordance with our Privacy Notice for Employees.

Data may be retained for longer period if we are legally obliged to do so or if retention is necessary to establish, exercise or defend legal claims.

## 7. HOW TO EXERCISE YOUR DATA PROTECTION RIGHTS

You have certain choices available to you when it comes to your personal data. Below is a summary of those choices as well as information on how to exercise them and any limitations to them.

Under certain circumstances, you have the following rights:

- **Right to request access to your personal data.** This enables you to receive a copy of the personal data we hold about you and to check that we are processing the data lawfully.
- **Right to request rectification of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected. Please note that the law may prohibit that we delete entries in certain cases, for example medical records.
- **Right to request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it.
- **Right to object to processing of your personal data** where we are relying on our legitimate interest (or that of a third party) as a legal basis for processing and there is something about your particular situation which makes you want to object to processing. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Right to request the restriction of processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish accuracy of the data or the reason for processing the data.
- **Right to request that we transmit your personal data to another party** (also known as data portability).
- Where our processing is solely based on your specific consent, **the right to withdraw your consent** at any time. Such withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of the data protection rights that are available to you, please send your request to us by email at [TalentAcquisitionInfo@digital14.com](mailto:TalentAcquisitionInfo@digital14.com) and we will action your request in accordance with applicable data protection laws.

You have the right to complain to your local data protection authority if you are unhappy with our data protection practices. In Finland, you can lodge a complaint with the Office of the Data Protection Ombudsman at <https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman>. For other European countries, the contact details of the data protection authorities can be found here: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

## **8. CHANGES TO THIS PRIVACY NOTICE**

This Privacy Notice may be updated from time to time to reflect changing legal, regulatory, or operational requirements. We encourage you to periodically consult our careers website for the latest information on our privacy practices.