

Jobseekers' Privacy Statement

1. Introduction

Componenta Corporation ("Componenta" or "controller") is committed to protecting your privacy and will process your personal data in compliance with the applicable data protection legislation and good data processing practice.

In this privacy statement, we tell you how we collect, process and protect your personal data in the course of our operations. This privacy statement concerns the processing of the personal data of Componenta's jobseekers ("jobseekers" or "data subjects") and their personal references ("references" or "data subjects") in connection with recruitment.

Componenta has separate privacy statements for its employee and other registers (general website privacy statement).

2. Controller and contact information

If you have any questions or requests regarding this privacy statement or the personal data Componenta holds concerning you, please contact:

Componenta Corporation (business identity code: 1635451-6)

Teknobulevardi 3-5 D
FI-01530 Vantaa
Finland
Tel. +358 10 403 00

Contact person / Data Protection Team: dataprotection@componenta.com

3. Purposes of the processing of personal data

We only collect and process your personal data insofar as this is necessary for our business and recruitment. We collect and process your personal data for the following purposes:

- The collection, storage and management of job applications
- Scheduling meetings
- Assessing the jobseeker's aptitude for the job (including credit information check, drug testing and security clearance)

4. Legal bases for the processing

The legal bases for the processing of employee registry data is mainly the controller's legitimate interest. Legitimate interest means processing essential for the controller's operations and which the data subject may reasonably expect to be part of the controller's operations. Most actions related to recruitment involve this kind of processing, such as receiving and storing applications, scheduling meetings and assessing the applicant's aptitude via interviews. In addition, the employer can check the applicant's credit information.

Recruitment may involve measures that are based on the data subject's consent. The applicant's consent is required for security clearances, for example. The applicant may also be asked to provide the results of a drug test.

5. Regular sources of data

The purpose of the processing defines the kind of data we collect in each situation and for what purpose. We only process your personal data mentioned below on legal grounds for pre-defined purposes.

Personal data related to recruitment are mainly collected from the data subject themselves. The data is collected via email, mail or personally through interviews and aptitude tests, for example.

Data can also be obtained from an external provider of recruitment services that has collected the data from the data subject. In addition, data can be collected from the personal references provided by the jobseeker. It is the jobseeker's responsibility to ask for the references' permission to process their personal data during recruitment.

The results of security clearances are obtained from the authority conducting the clearance (SUPO). The results of credit information checks are obtained from the parties maintaining them.

6. Data subject and personal data groups

Componenta collects the personal data listed below from the following data subject groups.

Jobseekers (including traineeship seekers):

- Identification and contact information
- Other information collected via job applications, CVs and interviews, such as a person's photograph, education, work experience, language skills and competencies
- Salary expectation
- Any other information supplied by the jobseeker
- Aptitude test results
- Credit information check result
- Data collected by interviewing personal references
- Security clearance result
- Suitability opinion from occupational health
- Drug test result

Personal references provided by the jobseeker:

- Name and contact information
- Eventual title and employer and/or grounds for acting as a reference

7. Disclosure and transfer of personal data

We are committed to handling your personal data with confidentiality.

Your personal data may be transferred to the following parties:

- Companies offering recruitment services (e.g. aptitude test)
- Party performing a credit information check
- Security police (security clearance)

Additionally, we may transfer personal data in the following cases:

- **Within the group:** Componenta may disclose data to companies or organisations belonging to the same group of companies or other comparable economic grouping that are subject to an obligation of confidentiality similar to that imposed on Componenta.
- **Authorities:** we may need to disclose certain data to authorities or those applying the law in cases where there is a legally mandated requirement to do so. We will only do so if required by current legislation, a valid court decision, or an order or subpoena from a public authority.
- **Mergers and acquisitions:** when a corporate acquisition or corporate reorganisation takes place, the acquiring party may obtain access to data contained in our filing system (e.g. transfer of business where the business is transferred to another company).
- **Consent:** we may disclose your personal data to third parties if you have given your consent for us to do so.

To process the data we collect, we also use subcontractors and service providers (e.g. the systems where your data is stored for technical maintenance). They are only allowed to process your data to the extent required by the agreed services. This means that they cannot use your data for their own purposes. They are obliged by contract to provide a sufficient privacy level and legal processing.

8. Transfer of personal data outside the EU/EEA:

Personal data related to recruitment will not be transferred outside the European Union or European Economic Area.

9. Data security

Componenta has appropriate technical and organisational data security measures in place to protect personal data against loss, abuse or other similar unlawful access.

Manual material containing personal data is stored in locked facilities to which only the individuals concerned have access. Such material will be appropriately disposed of as data security waste.

Digital material is password-protected. Additionally, they are subject to Componenta's or its subsidiaries' or subcontractors' general principles concerning data contained in information systems, such as firewalls and other appropriate technical and organisational safeguards. The access control system is used for ensuring that only the separately designated employees of Componenta or its subsidiaries or subcontractors have access to the users' personal data contained in the filing system data.

10. Retention of data

We will retain your personal data for as long as required for the purposes of processing, as long as the law requires us to do so, or until we receive a deletion request.

Security clearance result: To be disposed immediately after the clearance is no longer required for its purpose and at the latest, within 6 months from receiving the data.

Other recruitment data: To be retained for at least 1 year from providing a selection decision and removed after that in connection with yearly task data checks and disposals.

11. Automatic decision making and profiling

Data will not be used for automatic decision making or profiling.

12. Data subject's rights

As a data subject, you may exercise the rights listed below and/or express any concern you may have on the use of your personal data by contacting Componenta. The contact details are provided in the section entitled "Controller and contact information". You may submit your duly signed request in writing or come personally on-site to review your data at an agreed time. We will answer your request within one (1) month at the latest.

Right of access

The data subject has a statutory right to access their data and check which personal data has been recorded concerning them.

Right to rectification

The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning them.

Right to object to the processing of personal data

The data subject has the right to object to the processing of personal data if they feel that personal data has been processed unlawfully.

Right to restriction of processing

The data subject has the right to restrict processing if the criteria required under law are met. The controller will assess the opportunities for restricting the processing on a case-by-case basis.

Right to erasure ("right to be forgotten")

The data subject has the right to request that their data be erased if its processing is not necessary. The request for erasing data will be processed, after which data will be erased, or the data subject will be provided with justification for why data cannot be erased.

It should be noted that the controller may have a statutory or other right not to erase the data requested to be erased. The controller is obliged to retain accounting materials for the period (10 years) defined in the Accounting Act (Chapter 2, Section 10). For this reason, material related to accounting cannot be erased prior to the expiry of this period.

Right to transfer personal data from one system to another

The data subject has the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format, and the

right to transmit that data to another controller if the processing is based on consent or on a contract, and the processing is carried out by automated means.

Withdrawal of consent

If the processing of personal data concerning the data subject is solely based on consent and not, for example, on a customer relationship or membership, the data subject may withdraw their consent.

13. Right to lodge a complaint

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they feel that our processing of their personal data violates the current data protection laws.

Contact details of the Data Protection Ombudsman: www.tietosuoja.fi/fi/index/yhteystiedot.html

14. Updates to the privacy statement

Componenta develops its operations on an ongoing basis and therefore reserves the right to make changes to this privacy statement. Changes to the content of the privacy statement may also be due to changes in legislation. We will separately inform data subjects concerning any significant changes, such as a change in the purpose of the processing of personal data.