

# COMPONENTA

Hello!

*Thank you for your message! Please note the request for consent below if your message contains personal data for recruitment purposes.*

*With kind regards,  
Componenta Recruitment*

***The EU's General Data Protection Regulation requires the sender of an application to give explicit consent to processing their data.***

***If you submitted your application without any mention of your consent to processing your personal data, please respond to this message and provide your consent. Otherwise, we will not be able to process your application.***

***Please study the privacy policy below.***

## **Jobseekers' Privacy Statement**

### **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 referees ("referees" 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 ID: 1635451-6) Teknobulevardi 3-5 D 01530 Vantaa Finland Telephone: +358 10 403 00  
Contact person / Data Protection Team: tietosuoja@componenta.com or 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: • To collect, store and manage job applications • To arrange meetings • To assess the suitability of a jobseeker for the task (including credit information check, drug testing and security clearance)

### **4 Legal basis for processing**

The legal basis for processing 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 is mainly collected directly from the data subject. 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 referees specified by the jobseeker. It is the jobseeker's responsibility to ask for the referees' 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 details
- Other information collected through job applications, CVs and interviews, such as the person's image and information about their education, work experience, language skills and competence
- Salary expectation
- Any other information provided by the applicant
- Results of the aptitude test
- Result of the credit information check
- Data collected from interviews with the referees
- Result of the security clearance
- Suitability opinion from the occupational healthcare provider
- Result of drug testing

Referees specified by the applicant:

- Name and contact details
- If possible, title and employer and/or grounds for serving as a referee.

## 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:

- 4 • Companies providing recruitment services (e.g. aptitude test)

- The party performing the credit information check
- The Finnish Security and Intelligence Service (security clearance)

In addition, 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 another comparable economic grouping that are subject to an obligation of confidentiality similar to that imposed on Componenta.

- The authorities: we may need to disclose certain data to the authorities or enforcers of 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. technical maintenance of the systems where your data is stored). 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 contractually obligated 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. In addition, it is 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.

## **10 Retention of data**

We will store 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 of immediately after the clearance is no longer required for its purpose and no later than within (6) months from receiving the data (Security Clearance Act). Other recruitment data: To be stored for at least two (2) years from providing a selection decision and deleted after that in connection with yearly data checks and disposals (Act on Equality between Women and Men, Non-discrimination Act and Criminal Code).

## **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 of their data 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 the data will be erased, or the data subject will be provided with justification for why the 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. 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. Right to withdraw 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: <https://tietosuoja.fi/en/contact-information>

### **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.