

## Privacy Statement

Drafted on 21 May 2018

### 1. Data controller

Business Finland Oy (Business ID: 2725690-3)  
Visiting address: Porkkalankatu 1, 00180 Helsinki, Finland  
Switchboard: +358 (0)29 50 55000

### 2. Point of contact

Please e-mail: [tietosuoja@businessfinland.fi](mailto:tietosuoja@businessfinland.fi)

### 3. Name of register

Business Finland Oy's recruitment register

### 4. Purpose of personal data processing and basis for processing

Category of data subjects	Data utilised for	Basis for processing
New job applicants and data controller's employees applying for new position	<p>The data is used for evaluation and decision on recruitment of persons who have applied for employment or new position in Business Finland Oy. Applications to these positions may be open or aimed at a specific open position.</p> <p>The data of the person who has been recruited may be transferred to Business Finland Oy's personnel register for the purposes of managing labor relationship.</p>	Data controller's legitimate interest, contract

Processing tasks may be outsourced to third party service providers in accordance with the data protection legislation and the boundaries imposed by same.

Depending on the open position, it is possible that in the later course of the recruitment process the applicant may be invited to participate to competency testing and in that connection the personal data is considered to be used for profiling.

### 5. Data content of register

The following type of information regarding the data subject may be stored:

Applicant's name, date of birth, gender, nationality, contact details, qualifications and work experience, documents the applicant has submitted such as CVs, results of competency testing and analyses.

## 6. Personal data retention period

If the person has submitted open application, the data contained in the open application will be erased at the earliest after six months from submitting the application.

If the person has applied for particular position, the data contained in the application will be erased at the earliest after two years from the date the applicant received information on the outcome of the recruitment.

## 7. Regular sources of information

Information is mainly received from the applicant. Carrying out competency testing may be outsourced to the external service provider.

## 8. Regular transfer of information and recipient categories

Business Finland Oy acts together with the funding entity Innovaatorahoituskeskus Business Finland as one functional unit. Contents of open applications may be revealed to Innovaatorahoituskeskus Business Finland in order to evaluate the status of suitable positions in both organisations. In addition, in recruitments the recruiting superior may come from Innovaatorahoituskeskus Business Finland in which case the applicant's data may be revealed to Innovaatorahoituskeskus for the recruiting superior's information.

Otherwise Business Finland Oy does not transfer the data to other data controllers.

## 9. Transfer of data outside of the EU or EEA

Personal data may be transferred outside of the European Union or the European Economic Area in accordance with the data protection legislation and within the boundaries imposed by same. If no decision regarding an adequate level of data protection has been issued in relation to the target country or if the transfer does constitute a transfer to the United States in accordance with the Privacy Shield system, the transfer shall occur by means of employing the standard clauses approved by the European Commission.

Business Finland Oy may transfer personal data outside of the EU and the European Economic Area in accordance with the data protection legislation and within the boundaries imposed by same to the employees working in Business Finland's own overseas network, to Business Finland Oy's subsidiaries and subcontractors and to its service providers retained for data processing.

## 10. Principles for protecting the register

### Manual material

Any material to be retained on paper is stored in locked facilities equipped with access control. The data controller's personnel have undertaken confidentiality obligations.

### Data to be processed electronically

Access to the electronic data content of the register has been protected with personal user IDs and passwords. Utilisation of the data content of the register has been restricted to HR and recruiting managers. The environment has been protected with appropriate firewalls and other technical safeguards.

The purpose of the above-mentioned measures is to secure the confidentiality, availability and integrity of the personal data to be stored in the register, as well as the implementation of data subjects' rights.

#### 11. Automated decision-making

In the recruitment process the decisions related to recruitment are made by management. Consequently, the information in the register shall not be utilised for decision-making entailing legal effects for the person and that would be based on solely automated data processing, such as profiling.

#### 12. Data subject's right to object to the processing of personal data

The data subject shall have the right, in connection with their personal specific circumstances, to object to profiling pertaining to themselves and to other processing measures directed by the data controller at the data subject's personal data to the extent the data processing is based upon the data processor's legitimate interests.

The data subject may present their claim regarding the objection in accordance with section 14 of this privacy policy. In conjunction with the claim, the data subject must specify the specific circumstances based on which they are objecting to the processing. The data controller may refuse to carry out the request pertaining to the objection on the grounds stipulated for under the legislation.

#### 13. Other data subject's rights pertaining to the processing of personal data

##### Data subject's right to obtain access to the information (Right of Access)

The data subject shall have the right to inspect which data concerning them has been stored in the register. The inspection request must be submitted in accordance with the instructions set forth in this privacy policy. The right of access may be denied upon grounds stipulated in the law. As a point of departure, exercising one's right of access in an ordinary manner is free of charge.

##### Data subject's right to require the rectification or erasure of data or restriction of processing

To the extent the data subject is able to act for themselves, the data subject shall, without any undue delay, after becoming aware of the error, or, having detected the error themselves, rectify, erase or supplement any piece of information found in the register being contrary to the purpose of the register, erroneous, unnecessary, deficient or outdated.

To the extent, the data subject is not able to rectify the information themselves, the correction request shall be submitted in accordance with section 14 of this privacy policy.

The data subject shall also have the right to require the data controller to restrict the processing of their personal data, for instance in circumstances where the data subject is awaiting the data controller's response to their request regarding the correction or erasure of their personal data.

##### Data subject's right to lodge a complaint with the supervisory authority

The data subject shall have the right to lodge a complaint with the competent supervisory authority, if the data controller has not complied with the applicable data protection regulation in its operations.

## 14. Contacts

In all questions concerning the processing of personal data and situations related to the exercise of the data subject's rights, the data subject should contact the data controller. The data subject may exercise their rights by contacting [tietosuoja@businessfinland.fi](mailto:tietosuoja@businessfinland.fi).

## 15. Versions

This privacy policy is updated on May 21, 2018.

The data controller follows the developments in legislation and will develop its operations constantly, and consequently, retains the right to update this privacy policy.

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