

PRIVACY POLICY Combined Privacy Policy as required by the General Data Protection Regulation (EU) 2016/679 and the national Data Protection act

1. Controller

VPS Group Ltd Business ID: 1940704-6 Mikonkatu 17 C, 5th floor / PO Box 743 00101 HELSINKI Tel. +358 (0)9 684 4310

2. Contact information for the person responsible for the register

Maija Laivo Mikonkatu 17 C, 5th floor / PO Box 743 00101 HELSINKI Tel. +358 (0)40 867 0450 / +358 (0)9 6844 3124 maija.laivo@vps.fi

3. Name of the register

Personal Data Register

4. Purpose of the processing of personal data

The Personal Data Register contains information about job applicants that is necessary in creating and maintaining the employment and/or client relationship between VPS Henkilöstöpalvelu Oy, VPS Teollisuuspalvelut Oy or VPS Group Ltd/VPS Group Oü (hereafter collectively "VPS") and the job applicant. Only such personal data for job applicant are collected and stored in the Personal Data Register that are necessary for the assessment of the applicant's suitability for the position they are applying for at VPS or at VPS's customer. The collection of personal data is based on the data subject's consent, on VPS's legitimate interests or on the applicable law.

5. Information stored in the register

The data subject's – that is, the job applicant's – personal data collected and stored in the Personal Data Register are: first and last name, birth date, address, post code and city, phone number, email address, EU nationality or other nationality, work permit, work permit validity period, any hourly limitation related to the work permit, photo, information about the data subject's education and work experience: education, language skills, work experience, any special expertise, driving licence, possible car at their disposal, and any referees. In addition, the job applicant's preferences are collected, such as industry, location, position, working time and availability information (e.g. full-time, part-time, daytime work), and desired salary. Essential payroll information is also collected and stored in the Personal Data Register, such as the applicant's social security number, bank account number, tax ID, bank details, and emergency contact. Additional information collected and stored is that related to starting and terminating an employment relationship; basic information about the controller's customer (employer), such as name and contact details (address, email address, phone and fax numbers) and the contact person's name and contact details; information related to the controller's and data subject's client relationship, such as order information, client meetings and other communication between the parties, records of phone calls or meetings as well as information related to the service provided, such as the presentation of the applicant to the client company. VPS's clerical employees can change the data in the register when the data subject requests such changes. VPS's clerical employees have password-protected access to the register. If a data subject wishes to change their data in the register, they should contact the controller. When changes are made in the register, information is logged on who made the change and when.

6. Regular data sources

The collection and storage of data in the register is based on the data subject's consent, on VPS's legitimate interests or on applicable law. The applicant's data are collected from the application (either free-form or on an application form provided by VPS) submitted by the applicant, school reports, work and/or other testimonies, and from the information given by the applicant during any interview and/or employment or client relationship. Any feedback to VPS from the clients is also stored in the register.

7. Regular disclosure of information

The personal data are disclosed to VPS's clients which are the data subject's – that is, the job applicant's – prospective employers, with permission from the applicant. Access to the personal data is granted to VPS's clerical employees or other persons authorised by VPS who are responsible for the maintenance and administration of the register to the extent required for performing their duties. Personal data may be disclosed to third parties as allowed and required by the applicable legislation, also to the public authorities which have a legal right to obtain information from the register. The disclosure of personal data is based on the data subject's consent.

8. Information disclosure outside the EU or the EEA

Data will not be disclosed or transferred outside the EU or the EEA

9. Principles for the protection of the register

A. Manual records

Manual records are stored in locked premises. Access to the storage is granted to only those VPS's clerical employees who need to process personal data in order to perform their duties. B. Records processed with computer systems

Computer-based register is part of a network environment, to which only VPS's clerical employees have access. Personal data saved in computer systems are protected by firewalls and other appropriate technical measures. The personal data stored in the computer-based register are collected into common databases that are protected by firewalls and SSL connections. The register servers are located in locked premises with access restricted to defined employees. The computers used by VPS's clerical employees are password-protected and located in locked premises protected with an access control system. VPS is responsible for ensuring that applicants' personal data is not accessible to unauthorised persons. VPS requires appropriate data protection and commitment to not using the personal data from third parties involved in system administration and maintenance.

10. Right of access by the data subject

The data is deleted from the register 12 months after the last edit date, unless there is a legal basis for the retention of such data. The data subject has a right under the Personal Data Act Section 26 right to know, what personal data about them has been stored to Personal Data Register.

VPS provides that information to the data subject in comprehensible written or oral form. The signed request should be submitted in writing to the controller or presented orally at the controller's office. Access to the data is free of charge if at least one (1) year has passed since the previous instance of providing the data subject with access to data in the file. The controller will provide the data subject with the requested data or give them an opportunity to check the data without any unnecessary delay.

11. Right to rectification

If any personal data contained in its personal data file is erroneous, obsolete, incomplete or unnecessary, the data subject has a right to request rectification or deletion of their personal data in the register. Such requests should be directed to VPS's responsible employee, tel. +358 (0)40 867 450, majja.laivo@vps.fi.

12. Other rights in relation to personal data processing

We use cookies on our website. A cookie is a small text file that is sent to and stored on a user's computer. It enables the website administrator to identify returning users of the website. Cookies make it easier for users to register on the website and enable us to collect combined data on website visitors. We use that combined data to improve our services. Cookies do not harm the user's computer, files or personal data.