

23.4.2020

Privacy Notice – Recruitment

1. Controller	Name: EduCluster Finland Ltd (ECF) Address: Lutakonaukio 7, 40100 Jyväskylä, Finland
2. Controller´s authorized representative	Kati Loponen, CEO/COO Tel: +358 40 8254218 E-mail: kati.loponen@educluster.fi
3. Contact person	Name: Erkki Fadjukoff Position: ICT Specialist, Data protection officer Address: Lutakonaukio 7, 40100 Jyväskylä, Finland Other contact information: Tel. no: +358 40 759 9048 E-mail: privacy@educluster.fi
4. Purpose for processing personal data	Personal data will be used in recruiting new personnel. Provision of personal data is a requirement necessary to enter into a contract. Failure to provide personal data prevents ECF from processing the application.
5. Description the personal data processed	The applicants (data subjects) have sent an application for employment to ECF. The following information of the applicants may be collected: <ul style="list-style-type: none"> • full name, title, personal identity code • home address • contact information • Information/certificates of education and other qualifications • Information/certificates of work experience • CV • immigration related documents • any other recruitment related additional information the applicants have provided unsolicitedly or on request by ECF • photo, video or audio records made during the recruitment process.
6. Legal basis for processing the data	GDPR Article 6 subparagraph 1b “processing is necessary (for the performance of a contract to which the data subject is party or) in order to

	take steps at the request of the data subject prior to entering into a contract.“
7. Sources of personal data	Personal data is collected from the applicants.
8. Recipients of the personal data	<p>Personal data will be used by ECF's employees who are involved in the recruitment process.</p> <p>The applicant's consent will be asked in advance if ECF would like to give the applicant's personal data to third parties for aptitude evaluation purposes.</p>
9. Recipients in third countries	<p>Personal data may need to be transferred outside Europe</p> <p>A) to a country where the work position applied for, and/or ECF's client, is located. <i>Personal data will not be sent to the client without consent of the applicant.</i></p> <p>The transfer of data to ECF clients outside EU (if there is no European Commission's decision confirming adequacy of the data protection in client's home country) is based on GDPR Art 46 2(c) "standard data protection clauses". This means that a separate data transfer agreement following the commission approved model clauses will be entered into between ECF and the client receiving personal data.</p> <p>OR</p> <p>B) to ECF's a branch in Qatar if the position is in Qatar or ECF employees based in Qatar have essential knowledge needed for evaluating the applicant.</p> <p>Data protection legislation in Qatar differs from GDPR standards. ECF strives to afford the same level of data protection in Qatar and in Finland by using internal guidelines. The transfer of data to Qatar is not possible based on the primary mechanisms defined in GDPR articles 45 (commission adequacy decision), 46 (appropriate safeguards) or 47 (binding corporate rules). The transfer to ECF personnel in Qatar is based on GDPR Art. 49 subparagraph 1b "performance of a contract or the implementation of pre-contractual measures taken at the data subject's request".</p>

10. Time limits for erasure of data	<p>Data will be erased two years after the recruitment decisions have been given to the applicants.</p> <p>Unsolicited applications or CVs will not be stored. In case we don't have a suitable open position, ECF will guide the applicant to add the application data to our Expert Pool system.</p>
11. Rights of the data subject	<p>The data subject has the following rights:</p> <ol style="list-style-type: none"> 1. Right to be informed of data processing (Art 13) 2. Right of access (Art 15) <ul style="list-style-type: none"> - the data subject is entitled to access the personal data processed by the controller and other information related to the processing 3. Right to rectification (Art 16) <ul style="list-style-type: none"> - the data subject has a right to request correction of inaccurate data and complement incomplete data concerning him or her 4. Right to erasure (Art. 17) <ul style="list-style-type: none"> - the data subject has a right to request his/her data to be erased 5. Right to restriction of processing (Art 18) <ul style="list-style-type: none"> - the data subject is entitled to obtain from the controller restriction of processing where the conditions in Art 18 are met 6. Right to data portability, if the conditions in Art 20 are fulfilled 7. Right to withdraw consent, when processing is based on consent 8. The right to lodge a complaint with a supervisory authority (Art 77) <ul style="list-style-type: none"> - every data subject shall have the right to lodge a complaint with a supervisory authority (The Office of the Data Protection Ombudsman in Finland; www.tietosuoja.fi). <p>The rights may be exercised by contacting the data protection officer.</p>
12. Automated individual decision-making	<p>Personal data will not be used for automated decision-making producing legal effects concerning the data subjects.</p>