

Recruitment filing system: Record of processing activities

EU Regulation 679/2016 (General Data Protection Regulation) Articles 30 and 13

1. Controller	Name: EduCluster Finland Ltd (later: ECF)
	Address: Lutakonaukio 7, 40100 Jyväskylä, Finland
2. Controller´s authorized representative	Jyrki Saarivaara, CEO Tel: +358 40 1363900 E-mail: jyrki.saarivaara@educluster.fi
3. Contact person	Suvi Geier, Director Human Resources
	Address: Lutakonaukio 7, 40100 Jyväskylä, Finland
	Other contact information: Tel. no: +358 40 765 5705 E-mail: suvi.geier@educluster.fi
4. Data Protection officer	Name: Suvi Geier Contact information as above
5. Purpose for processing personal data	Information in the filing system will be used in recruiting new personnel. Failure to provide personal data prevents ECF from processing the application.
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. Description of the categories of data subjects and of the categories of personal data	The applicants (data subjects) have sent an application for employment to ECF. The applications are sent for a certain announced position or they may be unsolicited. The filing system may contain the following information of the applicants: <ul style="list-style-type: none"> • first name, surname, title, personal identification information • home address • e-mail address, phone number, other 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.

8. Regular sources of information	Information in the filing system is collected from the applicants.
9. Categories of recipients to whom the personal data have been or will be disclosed	<p>Information 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, in case their personal data would be given to third parties, for evaluating their aptitude.</p>
10. Recipients in third countries or international organizations	<p>ECF is a company doing business globally. Personal data or information in this filing system may be transferred to:</p> <ul style="list-style-type: none"> - a country where the work position applied for, and/or Client, is located. Personal data will not be sent to the Client without consent of the applicant. - ECF's a branch in Qatar or in the United Arab Emirates and a representative office in China. Information transfer can be done in case experts are sought for ECF duties in those countries or if ECF personnel based in those countries have essential knowledge needed for evaluating the expert. <p>The transfer of data is not possible based on the mechanisms defined in the (GDPR) ensuring sufficient level of data protection, namely:</p> <ol style="list-style-type: none"> 1) The Commission adequacy decision concerning level of data protection in a country outside EU (Art. 45 GDPR) OR 2) Appropriate safeguards (Art 46 GDPR) OR 3) Binding corporate rules approved by a competent supervisory authority (Art 47 GDPR) <p>The transfer to ECF Clients is based on GDPR Art. 49 subparagraph 1a "the data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards".</p> <p>The transfer to ECF personnel outside EU is based primarily on explicit consent or exceptionally on GDPR Art. 49 subparagraph 1b "the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request</p>
11. 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 will be erased at the latest two years after they have been received.</p>
12. General description of the technical and organizational security measures	<p>A Manual filing system</p> <p>The filing system is stored in electronic format. If an extract of the data is produced on paper, the prints will be stored in lockable cabinets. Any unsolicited paper applications which are not instantly deleted are digitized or the applicant is requested to send his/her application in electronic format.</p>

	<p>B Electronically processed information The server's database and content files are protected according to following practice:</p> <ul style="list-style-type: none"> • the data is transferred using data encryption (SSL) • the data is backed up on daily basis • access to the data server is restricted to authorized personnel only • access to the data center [physical location of server(s)] is restricted to authorised personnel only <p>The use of the filing system is controlled by username and password.</p>
13. Rights of the data subject	<p>The data subject has the following rights:</p> <ol style="list-style-type: none"> 1. Right of access (Art 15) <ul style="list-style-type: none"> - the data subject is entitled to access the personal information processed by the controller and certain information related to the processing 2. 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. 3. 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 4. 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 17 are met 5. 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). <p>The rights may be exercised by contacting the data protection officer.</p>
14. Automated individual decision-making	<p>The information in the filing system will not be used for automated decision-making producing legal effects concerning the data subjects.</p>