

## PRIVACY POLICY FOR KROGERUS' JOB APPLICANTS

### 1 GENERAL

In this privacy policy we provide information required by the General Data Protection Regulation 2016/679 of the European Union ("**GDPR**") to data subjects, *i.e.*, persons who apply to Krogerus for a job or traineeship. This privacy policy explains how we collect, retain and otherwise process applicants' personal data as a part of the recruitment process.

We describe how we process the personal data of the hired employee in the Krogerus' privacy policy for employees.

### 2 CONTROLLER AND CONTACT DETAILS OF THE CONTROLLER

Krogerus Attorneys Ltd ("**Krogerus**" or "**we**") acts as the data controller in accordance with this privacy policy.

The contact person of the controller Catharina Grundfelt.

Address: Fabianinkatu 9, 00130 Helsinki

Email: [catharina.grundfelt@krogerus.com](mailto:catharina.grundfelt@krogerus.com)

### 3 PURPOSES AND LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA

The main purpose of processing personal data is to organise and carry out recruitment in order to select the right employee or trainee for us. We can only process personal data on legal bases derived from data protection legislation. We process personal data on the basis of pre-contractual measures taken at the request of the data subject if we select a job applicant as an employee or trainee for Krogerus, and on the basis of the legitimate interest of the data controller if the job applicant is not selected for Krogerus.

The table below lists, by category, the purpose of the processing, the legal basis and the categories of personal data processed. For a more detailed description of the categories of personal data to be stored, see section 4.

Purpose of processing	Legal basis	Categories of personal data
Recruitment	Legitimate interest of the data controller / Pre-contractual measures taken at the request of the data subject	Identification data, data on employment history and current job, education and training data, data on aptitude assessments, photograph of the applicant, other job-related information voluntarily

		provided by the job applicant to the controller
Recruitment	Legitimate interest of the data controller	Identification data of referees
Recruitment	Consent of the data subject	Data collected from referees

## 4

**CATEGORIES OF PERSONAL DATA**

This table further defines the categories of personal data referred to in section 3 to the extent that they are not otherwise unambiguously defined in that section.

<b>Category of personal data</b>	<b>Content of the category</b>
Identity data	The name and contact details of the natural person (data subject), <i>i.e.</i> email address, telephone number and home address
Data on employment history and current job	Information on previous employers and current employer, duration of previous employment, type of work and title
Education and training data	Degrees and trainings completed, transcripts and diploma, records of academic achievements, scholarships and other awards, and any other certificates held by the applicant
Data on aptitude assessments	Data on the results and suitability of the aptitude assessment
Photograph of the applicant	A portrait

Other job-related data voluntarily provided by the job applicant to the controller	Information contained in the cover letter and CV and other information provided by the applicant during the interview, such as skills and competences, salary requirements, age, date of birth, title, skills, hobbies and interests, and information on leisure activities such as extracurricular activities
Identity data of referees	Name, title, company, email and phone number of the referee
Data collected from referees	Information on the applicants' performance at work

## 5 SOURCES AND UPDATING OF PERSONAL DATA

In the context of recruitment, we obtain the data we process from the applicant in the context of job applications, aptitude assessments, interviews and other encounters. With the consent of the job applicant, we may also receive data from referees named by the applicant.

The provision of personal data is voluntary to the extent that it is up to the data subject to decide whether to apply or continue in Krogerus' recruitment process. However, if the data subject participates in the Krogerus recruitment process, the provision of sufficient information to carry out the assessment is mandatory for the recruitment to take place. Without sufficient information, we are unable to assess whether the applicant would be suitable for the position and therefore, without sufficient information, we cannot offer the position.

## 6 RECIPIENTS AND CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Only Krogerus' employees who are involved in the recruitment process as part of their job duties and who therefore need the data to carry out the recruitment process will process the personal data of applicants. Even then, the data will only be processed to the extent necessary for the performance of their tasks. Krogerus' employees are bound by confidentiality.

In addition, Krogerus discloses personal data to companies that act as Krogerus' service providers for recruitment platforms and aptitude assessments.

Service providers process personal data only to the extent necessary to provide the service in question or in connection with system maintenance and troubleshooting. Krogerus concludes a contract to process personal data with all of its subcontractors who process personal data on behalf of Krogerus. In addition, contracts concerning the use of personal data are also concluded with service providers other than those acting as processors. Further information on the processing of data by such service providers can best be found on their own websites. Each service provider processes personal data only to the extent necessary for the provision of the service.

We may also transfer or disclose personal data to other authorities if required by applicable laws.

## **7 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

Krogerus does not explicitly transfer data outside the European Union or the European Economic Area ("EU/EEA"). However, data may be transferred outside the EU/EEA in situations where our service providers or their parent companies are located in such third countries. Where data is transferred outside the EU/EEA, such transfers will be subject to the conditions set out in data protection legislation, such as the European Commission's Standard Contractual Clauses or other transfer mechanism designated in the GDPR.

## **8 DATA RETENTION PERIOD OR CRITERIA FOR DETERMINING THE RETENTION PERIOD**

Recruitment records are retained for the duration of the recruitment process and up to one year after the recruitment process. For hired applicants, we retain data on aptitude assessments for two years.

## **9 SECURITY OF THE PROSESSING**

Krogerus implements and maintains the following technical and organisational measures to ensure the protection of personal data:

- designated personnel responsible for developing, implementing and maintaining data security;
- internal guidelines and regulations on data security and data protection;
- non-disclosure agreements and undertakings;
- regular audit and risk assessment processes;
- update management processes;
- access rights and access control;
- data encryption;
- organised and regular staff training;
- business continuity and recovery plans; and
- physical and perimeter security of production facilities and other areas containing confidential information

The adequacy of the measures has been assessed on the basis of a risk assessment, taking into account, *i.a.*, the nature, scope, context and purposes of the processing, as well as the risks to the rights and freedoms of data subjects. The measures are regularly assessed and reviewed and updated, as necessary.

Krogerus is committed to following the guidelines of the Finnish Bar Association.

The data will not be used for profiling and the processing does not include automated decision-making.

## **10 RIGHTS OF THE DATA SUBJECT**

As a data subject, you have the following rights at your disposal:

<b>Rights of the data subject</b>	
<b>Right of access to your data</b>	<p>You have the right to know whether Krogerus processes your personal data and what personal data Krogerus processes. You can also request a copy of your personal data. You also have the right to inspect the personal data concerning you. Krogerus cannot, however, in order to protect the confidentiality of its clients, agree to requests for data that could jeopardise the processing of confidential client data.</p> <p>If you make your request electronically and have not requested another form of delivery, the data will be provided in the commonly used electronic format.</p>
<b>Right to rectify your data</b>	<p>You have the right to request that inaccurate or incorrect personal data concerning you be corrected or completed. However, due to the nature of the legal profession, Krogerus cannot always correct data, especially in the case of large requests.</p>
<b>Right to delete your data</b>	<p>You have the right to have your data deleted in certain cases. However, a request to delete personal data cannot be implemented if the personal data is stored, for example, to comply with a legal obligation.</p>
<b>Right to restrict the processing of your data</b>	<p>In certain cases, you have the right to request restriction of the processing of your data.</p>
<b>Right to object to the processing of your data</b>	<p>You have the right to object to the processing of your data in certain cases. Krogerus may refuse a request if the processing is necessary for the legitimate interests of Krogerus or a third party.</p>
<b>The right to transfer data from one system to another</b>	<p>To the extent that we process your data on a contractual basis and the processing</p>

	is carried out automatically, you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and the right to transfer that data to another controller.
<b>Right to lodge a complaint with a supervisory authority</b>	You have the right to lodge a complaint with the competent supervisory authority if you consider that data protection legislation has not been respected in the processing of your personal data. In Finland, the supervisory authority is the Data Protection Ombudsman.

All requests mentioned here should be sent to the contact person of Krogerus named in section 2. You can make a free-form request. We may ask you specific questions if necessary to fulfil your request.

More detailed information on the exercise of data subjects' rights is available on the website of the Data Protection Ombudsman (<https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations>).