

# Human Resources Privacy Policy

In this privacy policy, we describe how we process personal data on our Human Resource activities. You shall be provided more information on:

- What kind of data we process?
- For what purposes we use the data?
- How long do we retain the data?
- What opportunities you have to effect?
- Where is the data transferred or disclosed to?
- How is the data protected?
- Can amendments be made to this privacy policy?
- Who can you contact?

## What kind of data do we process?

Typically we process the following data:

- **Personal data you provided**, such as name, e-mail address, phone number. Providing other data is completely voluntary.

## For what purposes we use the data?

We use the data for the following purposes:

- **Job applications and HR:** We use the data to get in touch with people who might be interested in joining our team.

## How long do we retain the data?

We retain the data in accordance with the following retention periods:

- **Data you provided:** We retain the data only necessary time period. In case of recruiting when you indicate that you're not interested in our job offer, we remove your data. Maximum data retention time is half a year after which we always erase the data.

You may also influence the retention period of your data by using the opportunities to the effect described below, such as requesting the deletion of your data.

## What opportunities you have to effect?

There are several ways you may influence the collection and processing of data:

- **Verification, correction and deletion of the data:** You have the right to verify the personal data stored about you. At your request, we will correct, supplement or delete inaccurate, incomplete or outdated personal data for the purpose of processing.
- **Data transfer:** You may wish to have your personal data, which we automatically process based on your consent, transferred by contacting us at the address provided at the end of this privacy policy.
- **Right to object and restrict:** You may object the processing based on legitimate interest. For example, in such situation, the processing is restricted for the time when the grounds for the objection of processing are assessed.
- **Withdrawal of consent:** You may withdraw your consent at any time by contacting the address provided at the end of

this privacy notice. You may cancel the newsletter by clicking the link at the end of the message.

- **Right to appeal:** You may file a complaint with the authority if you consider that your personal data has been processed against data protection legislation (<https://tietosuoja.fi/en/>)

Exercising the above rights requires that we are able to identify you personally.

## Where is the data transferred or disclosed to?

We do not disclose your personal data to third parties in other than the following exceptional cases:

- **Authorities:** We may disclose your personal data in the manner required by the competent authorities and applicable legislation in force from time to time.
- **Consent:** We may disclose your data to third parties if you have given your consent to that.
- **Mergers and acquisitions:** If we sell, merge or otherwise organize our business, your personal data may be disclosed to the buyers and their advisor.

We use subcontractors to process the data in which case we guarantee through contractual arrangements that the data will be processed in accordance with the legislation in force from time to time. Our office is partially located outside of the EU or the EEA. If we transfer the data outside the EU or the EEA, we will ensure the adequate level of protection of personal data, inter alia, by agreeing on matters related to the confidentiality and processing of personal data as required by legislation, e.g. by using model contract clauses approved by the European Commission or Privacy Shield mechanism. We also could obtain your prior explicit consent to process your data outside of EU or EEA.

## How is the data protected?

We use appropriate technical and organizational security measures to protect personal data against unauthorized processing. Such means include, inter alia, the use of firewalls and encryption technologies, appropriate access control, restricted access rights, the guidance of the personnel involved in the processing of personal data and careful selection of subcontractors.

## Can amendments be made to this privacy policy?

We are constantly developing our services and we may amend this privacy policy. The amendments may also be based on changes in legislation. We recommend that you regularly familiarize yourself with the content of this privacy policy.

This privacy policy was published on the 1st of September 2021.

## Who process my data?

We are Zoan, officially Zoan Oy, a limited liability company registered in the Republic of Finland. Our registration number at the corporation registry is 2352411-4 and the registered address Bulevardi 1 A, FI-00100 Helsinki, Finland.

## Want to exercise your rights?

In case you would like to exercise your rights, hear more about them or contact us you could do so by accessing our privacy portal: <https://privacy.zoan.fi/>

