

## **Data Protection Description for Recruitment Personal Data**

### **Data subjects**

Pöyry PLC's and its affiliates' ("Pöyry") potential employees

### **Data content**

The data is collected on job applicants for recruitment purposes. The needed information may slightly vary in different countries based on the local legislation and on the job description.

In order for an applicant to apply for a position, Pöyry will ask the applicants to fill in a web form to enter their personal and contact data (such as your name, year of birth, address, telephone), work experience, education, competencies, qualifications, references and job preferences. Applicants are asked to attach their CV, but they may choose to attach also other documents to supplement their data, such as a cover letter and a photo. In addition applicants will be asked to indicate whether they wish that the application is considered also for other positions in Pöyry and describe their areas of interest.

Job applicants are asked not to include any sensitive data such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and biometric data, data concerning health, data concerning a natural person's sexual orientation in their application, CV or other attachments.

Information submitted by the job applicant may be combined with other data collected during the recruitment process (e.g. information obtained from interviews, assessments or references). All this information will be stored in Pöyry's e-recruitment systems. In case the job applicant is chosen for the position, the described data and additional data will be collected for the employment contract purposes.

### **Purpose of processing**

Data of employee candidates is collected for the business purpose to hire new employees. The legal purpose for processing the data is regarding many pieces of the data legal obligations and/or legitimate interest of the possible employer. Some of the data is processed based on consent of the candidate (e.g. data not required but still received in the CV or application letter).

Applicant information may be shared within Pöyry's Human Resource function and its other business functions (e.g. line management in relation to specific positions) to determine how well the application fits the position the employee candidate have applied for, or possible future postings. Additionally, the application data will be viewed together with additional information the applicant provides Pöyry during the recruitment process (e.g. interviews, assessments, references). If applicant becomes an employee, the data may be retained and used for personnel administration including the establishment of a personnel record or other employment related purposes.

### **Transfer of data**

Data is transferred within Pöyry. Data is also transferred to external subconsultants and vendors (such as Pöyry's Recruitment service provider) when they process personal data on behalf of Pöyry. All data transfers are covered by agreements as required by law.

Pöyry is a company that operates globally. Applicant's data might therefore be used globally in connection with the recruitment process by Pöyry in the following countries: Armenia, Australia, Austria, Brazil, Cambodia, Canada, Chile, China, Czech Republic, Finland, France, Georgia, Germany, Hungary, India, Indonesia, Italy, Jordan, Laos, Malaysia, Mexico, New Zealand, Nigeria, Norway, Peru, Philippines, Poland, Portugal, Russia, Saudi Arabia, Singapore, South Africa, Spain, Sri Lanka, Sweden, Switzerland, Tajikistan, Thailand, Turkey, United Arab Emirates, United Kingdom, United States, Uruguay, Vietnam.

Pöyry may also provide its services in other countries in which case the personal data is transferred to those countries strictly on a need to know basis.

Pöyry will take all reasonable steps to protect the applicant personal data and prevent unauthorized access. All the applicant information may only be accessed and processed by Pöyry employees involved in the recruitment process anywhere in the world, as well as by authorized third parties such as companies providing assessments assisting Pöyry in the recruitment process. The servers on which the personal data is stored are located within the European Union.

### **Transfer of data outside EU**

Data is transferred in systems used within Pöyry also outside EU/EEA as described above. EU Commission standard contractual clauses are used to ensure safe international transfer of personal data.

### **Retention period**

The data is stored for 12 months after the recruitment is done (application to a specific job). The data is stored for 12 months from the sending of the application (open application.) Applicant information may only be kept for a longer period if local legislation requires so.

### **Rights of individuals**

#### **The right of access**

When applicant provides their information to Pöyry by sending their application, an account and credentials (user ID and password) for updating the application(s) will be created for them automatically. Applicant may check, change, re-use or delete their personal information at any time by logging into their account by using their personal user ID and password.

An individual may also access his/her data also by submitting a detailed request via email to [privacy@poyry.com](mailto:privacy@poyry.com).

#### **The right to rectification**

An individual may rectify his/her data by submitting a detailed request to [privacy@poyry.com](mailto:privacy@poyry.com) and he/she should do this if Pöyry holds inaccurate data regarding him/her.

#### **The right to erasure**

An individual may ask to erase his/her data by submitting a detailed request to [privacy@poyry.com](mailto:privacy@poyry.com).

The individual may ask to erase his/her data if:

- the data is no longer needed for its original purpose and no new legal purpose exists;
- the processing is based on the individual's consent and the individual withdraws the consent;
- the individual objects the processing, and Pöyry has no overriding grounds for continuing the processing;
- the data has been processed unlawfully; or
- erasure is necessary for compliance with EU law or the national law of the relevant Member State.

#### **The right to restrict processing**

An individual may ask to restrict the processing of his/her data by submitting a detailed request to [privacy@poyry.com](mailto:privacy@poyry.com).

The individual may ask to restrict the processing of his/her data if:

- the individual contests the accuracy of the personal data;
- the data is processed based on legitimate interest of Pöyry;
- he/she thinks that the processing is unlawful; or

- Pöyry no longer needs the personal data but the individual requires the data to establish, exercise or defend a legal claim.

**The right to data portability**

An individual may ask to transport his/her data by submitting a detailed request via email to [privacy@poyry.com](mailto:privacy@poyry.com).

The individual may ask his/her data to be transmitted to another controller if:

- the personal data is processed by automated means;
- the data subject has provided the personal data to Pöyry; and
- the basis for processing is contractual necessity.

**The right to object**

An individual may object the processing of his/her data processed based on legitimate interest of Pöyry by submitting a detailed request via email to [privacy@poyry.com](mailto:privacy@poyry.com).

**The right to contact data protection authority**

An individual has the right to contact the relevant data protection authority regarding the processing of his/her data.

**Data security measures**

Pöyry is committed to securing personal information. Pöyry protects the confidentiality and security of information by using physical, electrical and administrative controls. All personal data is collected only for legitimate purposes and not processed in a manner that is incompatible with those purposes. The amount of data is minimized to what is necessary and not stored for longer than is necessary for the purposes. The personal data is kept up to date and protected against unauthorized or unlawful processing and against accidental loss, destruction or damage with the available appropriate technical or organisational measures. Pöyry's systems are protected from unapproved external access. Access to systems containing personal data is controlled via approval processes that consider the person's role and justified business need. The use of the system and access to information is limited on an individual level and protected by using personal user access rights.

**Data controller**

Pöyry PLC and its affiliates  
Jaakonkatu 3  
01620 Vantaa  
Finland

**Contact information of data controller**

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