#### **PRIVACY STATEMENT - JOB APPLICANTS**

# Summa Defence Ltd.'s job applicant database

Privacy statement in accordance with Articles 13 and 14 of the General Data Protection Regulation (679/2016/EU).

#### 1. Data controller

Summa Defence Ltd.
Business ID: 3455766-7
Mäkelänkatu 87, 00610 Helsinki
contact@summadefence.com

# 2. Registry matters

Our data protection officer responds to questions and feedback about the registry within four business days. Please contact contact@summadefence.com

# 3. Name of the register

Summa Defence Ltd.'s job applicant database

# 4. Purpose of processing personal data

The personal data in the database is used in the recruitment of employees by Summa Defence Ltd. and its owned companies.

The purpose of processing personal data is to enable communication between job applicants/candidates and Summa Defence Ltd. in recruitment situations. In addition, the purpose of processing is to store data for future assignments with the consent of the candidates for this purpose.

The collection of personal data is based on the candidate's consent (open or targeted applications) or legitimate interest. Summa Defence Ltd. has a legitimate interest in the processing of personal data, which is based on the relevant and appropriate relationship between the candidates and the company.

# 5. Information content of the register

The register contains information provided by individuals with their own consent, as well as information collected from publicly available or available sources for the implementation of a certain assignment (legitimate interest).

The register may contain information about individuals according to the following grouping:

- name, date of birth, telephone number, email address, postal address
- information related to work and education history
- information related to professional interests and employment wishes
- person's CV and possibly application or cover letter
- other information necessary for the purpose of the register
- information related to the progress of the assignment, such as log data from communication and meetings

The data of the registered candidate will be kept for two years from the submission of the application or from receiving the permission to store the data.

# 6. Regular sources of information

Information provided by the registered person themselves for a certain job application, such as CV and open application, as well as information given orally during telephone conversations, meetings and online discussions about professional background and placement wishes.

Information collected from public sources on the basis of a legitimate interest necessary for the implementation of a certain direct search. Public sources used include open websites and databases and services protected by user rights that contain candidate, company and industry information.

#### 7. Retention period of personal data

The personal data of the registered candidate is kept for two (2) years from the submission of the application or from when the candidate has confirmed the permission to continue storing the data. Data may also be processed in connection with recruitment assignments carried out by other companies in the Summa Defence Ltd. portfolio with the consent of the registered person. If necessary, data can be stored longer than the above-mentioned period to implement or demonstrate the proper implementation of equality based on a legal obligation. If a person is selected for a position in a client company, the data can be kept longer.

# 8. Regular data transfers

Information provided by the person themselves for a certain job application is also transferred to the possible direct search client. In connection with the transfer, the client also becomes a data controller for these data.

The data controller transfers data to third parties used as subcontractors. The respondent accepts this when providing information. The processing of personal data takes place mainly within the European Economic Area. Some of our partners may process data outside the EU. All service providers are committed to complying with the requirements of the EU Data Protection Regulation.

Data is not disclosed to outsiders or used for other assignments without the permission of the data provider, unless the data is disclosed in accordance with the requirements of legislation or official regulations.

# 9. Principles of registry protection

Personal data is kept confidential. Only those employees who have the right to process candidate data due to their work are entitled to use the personal data system. Each user has their own username and password for the system.

The data is collected into databases that are protected by firewalls, passwords and other technical means. The databases and their backups are located in locked spaces and only certain pre-designated persons have access to the data. Personal data is kept as long as it is necessary for the purpose of using personal data.

# 10. Inspection and deletion right

According to the legislation, the data subject has the right to check what information about them has been stored in the personal register. The inspection request (including the request for data deletion) must be made in writing and then sent signed to the data controller at the address mentioned above. Processing one inspection request per year is free of charge for the registered person.

# 11. Right of correction

The data subject also has the right to demand the correction of incorrect information in the register. The data correction request must specify the error to be corrected and provide the corrected data. The correction request must be made in writing and then sent signed to the data controller at the address mentioned above.

# 12. Changes to the privacy statement

We constantly improve and develop our services and websites, so changes may be made to the privacy statements from time to time. We update the new statement on our website and mark the update time on it. Please read the privacy statement from time to time to get up-to-date information on possible changes.

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