

Bluefors Privacy Policies for Job Applicant Registers

Bluefors processes your personal data when you apply for a specific job, send us an open application, or sign up to our talent community on our recruitment portal. This document contains information on how the recruiting Bluefors entity processes your personal data in connection with the application process.

If you are applying for a job at **Bluefors Oy** in Finland:

Please see the **Bluefors Oy Privacy Policy** below.

If you are applying for a job at **Bluefors Inc.** in the United States of America:

Please see the **Bluefors Inc. Privacy Policy** below.

Bluefors Oy

Privacy Policy for Job Applicant Register

September 18, 2023

1 Data Controller

Bluefors Oy

Business ID: 2183219-9

Address: Arinatie 10, 00370 Helsinki, Finland

2 Contact details

People Operations

Annika Salenius-Saartenoja or Meri Koski

Address: Arinatie 10, 00370 Helsinki, Finland

Telephone: +358 9 5617 4800

E-mail: recruitment@bluefors.com

All contacts and requests concerning this privacy policy shall be submitted in writing to the contact person above.

3 Name of register and general description

Job Applicant Register

This privacy policy describes how Bluefors Oy ("Bluefors, "we, "our" or "us") processes your personal data when you apply for a specific job, send us an open application, or sign up to our talent community on our recruitment portal.

4 Purposes and legal basis for processing of personal data

We process the job applicant's personal data for the following purposes:

- to receive and to process job applications
- to identify suitable applicants for job openings based on assessments of their profile, skills, and experience
- to communicate with the job applicant and send information
- to manage our recruitment processes (including initial contacts, application screening, interviews, tests, and other assessments)

We process personal data related to the recruitment process of the people who have applied for our positions or submitted their personal data to our talent community to enable contacting the job applicant and for the selections process when filling the positions.

We use automatic data processing to match the job applicant's profile, skills, and experience with our positions, but do not make any recruitment decisions based solely on automated data processing.

The legal basis for processing personal data is:

- Legitimate interest of the controller, which is based on Bluefors' need to process personal data for recruitment purposes and formed of the connection between Bluefors and the job applicant (General Data Protection Regulation (EU) 2016/679, Article 6.1 (f)); or
- Data subject's explicit consent to the processing of their personal data (General Data Protection Regulation (EU) 2016/679, Article 6.1 (a)), for example when collecting personal data from references or processing personal data in aptitude assessments.

If you are employed by Bluefors, your personal data will be processed for employment purposes in accordance with our employee privacy policy.

5 What personal data do we process?

We process the following personal data of the job applicants or other data subjects in connection with the job applicant register:

- *Basic information provided by the data subject* such as name, birth date, and/or other identifier, password, gender, mother tongue;
- *Contact information of the data subject* such as email address, phone number, home address;
- *Information regarding the position applied for* such as information of the position in question including information of the nature and type of the employment relationship and information of the contact persons designated for the recruitment process;
- *Other information that the data subject has provided of themselves, their background etc. in connection with the recruitment process*, such as a picture, study and other educational information, work history, language skills, other special skills, description of personal features, different degrees, certificates and ratings, and references to portfolios, profiles and other sources found on the internet and referees;
- *Information regarding the recruitment process of the data subject* such as internal notes about the job applicant, information of upcoming further interviews or of the interruption of the recruitment process;
- *Other possible information that the data subject themselves has provided voluntarily* in connection with the recruitment process or information that Bluefors has collected based on a separate consent of the data subject, such as the results of a possible aptitude assessment.

Providing personal data is a requirement for us to be able to move forward in the recruitment process.

6 From where do we receive personal data?

We receive personal data primarily from the data subject themselves when submitting the application or signing up to our talent community. This includes the personal data directly submitted to our recruitment platform or imported from a third-party platform chosen by the data subject (e.g. LinkedIn).

We may also collect personal data when otherwise communicating with the job applicant during the recruitment process. We can use other sources within the limits of applicable laws and regulations. We use recruitment consultants when necessary and may receive personal data from them.

7 To whom do we disclose personal data and how do we process data outside the EU and EEA?

We process your personal data primarily ourselves and use service providers that process personal data for us. To make the recruitment process as smooth as possible, we use the TalentAdore recruitment platform for processing job applications. The platform is operated by our service provider Talentadore Oy. In case of possible aptitude assessments, we may use a partner that processes personal data for us as a service provider.

When using service providers, we enter into data processing agreements with them as required by law and ensure that each service provider is bound by confidentiality obligations regarding your personal data.

We may also disclose your personal data to our subsidiaries Bluefors GmbH (located in Germany) and Bluefors Inc. (located in the USA).

We primarily process personal data on servers within the EU/EEA. However, we may need to process your personal data outside the EU/EEA, for example when our subsidiary Bluefors Inc. processes personal data in the USA or when data processing outside the EU/EEA is otherwise necessary to carry out activities or services related to our recruitment process. For any such processing, we implement appropriate measures in accordance with applicable data protection regulations to ensure that your personal data remains protected and secure. Our international transfers of personal data are based on the [EU Commission's standard contractual clauses](#).

8 How do we protect and for how long do we store your personal data?

Only those of our employees and service providers, who due to their working duties need to process job applicant data, are entitled to use data systems containing personal data of the job applicants. Personal data is processed in systems and databases protected by firewalls, passwords, and other appropriate

technical and organizational measures. The databases and the backup copies of them are stored in locked premises and can be accessed only by certain pre-designated persons.

We keep your application and any other personal data that we have collected for the purpose of the recruitment process until the recruitment has been completed and for a period of twenty four months thereafter. If you sign up to our talent community, we process your personal data as long as we consider your profile relevant to us, but no longer than twelve months from the date that you signed up. We will send you a reminder of your profile's expiration and you may choose to update your profile and renew the processing period of your profile and personal data.

If the job applicant is employed by Bluefors, the relevant personal data will be transferred to our employee register and processed for employment purposes in accordance with our employee privacy policy.

9 Your rights as a data subject

We are required to ensure that your personal data is kept accurate and up to date. Please inform us of any changes or updates to your information and your preferences by contacting us through the contact details identified in Section 2 above or using the features available on our recruitment portal.

You may at any time exercise your rights in relation to your personal data that we process in accordance with this privacy policy:

- *Right to access, rectification, and restriction:* You have the right to request access to your personal data. This includes the right to be informed of whether we process your personal data, what personal data is being processed, and the purpose of the processing. You also have the right to request correction of any inaccurate or incomplete personal data. In certain situations, you may also request the restriction of processing of your personal data.
- *Right to object:* You may object to certain processing of personal data on grounds relating to your particular situation, when we process your personal data based on our legitimate interest.
- *Right to erasure:* You may also request that your personal data be erased if the personal data is no longer necessary for the purposes for which it was collected, the processing is unlawful, or the personal data must be erased to enable us to comply with a legal requirement.
- *Right to withdraw your consent:* If the processing of your personal data is based on your consent, you have the right to withdraw your consent to such processing at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- *Right to data portability:* If personal data about you that you have provided yourself is processed automatically with your consent, you may request that the data is provided in a structured, commonly used, and machine-readable format and you may also request that the personal data is transmitted to another controller, if this is technically feasible.
- *Right to lodge a complaint with a supervisory authority:* If you wish to lodge a complaint with a national supervisory authority regarding our processing of your personal data, you may do so by contacting your local data protection authority. The relevant authority in Finland is the Data Protection Ombudsman (www.tietosuoja.fi).

Bluefors Inc.

Privacy Policy for Job Applicant Register

October 4, 2021

1 Contact details

Bluefors Inc.
Attention: Annika Ordenana
Address: 253 36th Street – Suite C302
11232 Brooklyn, NY
USA
Telephone: +1 646 558 3440
E-mail: brooklyn@bluefors.us

All contacts and requests concerning this privacy policy shall be submitted in writing to the contact person above.

2 General description

This privacy policy describes how Bluefors Inc. (“Bluefors, “we, “our” or “us”) processes your personal information when you apply for a specific job, send us an open application, or sign up to our talent community on our recruitment portal. It also explains the choices you have in relation to these processing activities.

Personal information means all information that relates to an identified individual or to an identifiable individual. For example, your name, address, email address, educational and employment background, CV and job qualifications. Personal information is also referred to as information about you.

3 Purposes of processing of personal information

We process the job applicant’s personal information for the following purposes:

- to receive and to process job applications
- to identify suitable applicants for job openings based on assessments of their profile, skills, and experience
- to communicate with the job applicant and send information
- to manage our recruitment processes (including initial contacts, application screening, interviews, tests, and other assessments)

We process personal information related to the recruitment process of the people who have applied for our positions or submitted their personal information to our talent community to enable us to contact the job applicant and for the selection process when filling the positions.

We use automatic data processing to match the job applicant’s profile, skills, and experience with our positions, but do not make any recruitment decisions based solely on automated data processing.

If you are employed by Bluefors, your personal information will be processed for employment purposes in accordance with our employee privacy policy.

4 What personal information do we process?

We process the following personal information of the job applicants or other individuals in connection with the job applicant register:

- *Basic information provided by the job applicant* such as name, birth date, and/or other identifier, password, gender, mother tongue;
- *Contact information of the job applicant*, such as email address, phone number, home address;
- *Information regarding the position applied for*, such as information of the position in question including information of the nature and type of the employment relationship and information of the contact persons designated for the recruitment process;
- *Other information that the job applicant has provided of themselves, their background etc. in connection with the recruitment process*, such as a picture, study and other educational information, work history, language skills, other special skills, description of personal features, different degrees, certificates and ratings, and references to portfolios, profiles and other sources found on the internet and referees;
- *Information regarding the recruitment process of the job applicant*, such as internal notes about the job applicant, information of upcoming further interviews or of the interruption of the recruitment process;
- *Information about job applicants from other sources*, such as from persons you indicate as a reference and in connection with background or employment checks;
- *Other possible information that the job applicant themselves has provided voluntarily* in connection with the recruitment process or information that Bluefors has collected based on a separate consent of the job applicant, such as the results of a possible aptitude assessment.

Providing personal information is a requirement for us to be able to move forward in the recruitment process.

5 From where do we receive personal information?

We receive personal information primarily from the job applicants themselves when submitting the application or signing up to our talent community. This includes the personal information directly submitted to our recruitment platform or imported from a third-party platform chosen by the job applicant (e.g. LinkedIn).

We may also collect personal information when otherwise communicating with the job applicant during the recruitment process. We can use other sources within the limits of applicable laws and regulations. We use recruitment consultants and background or employment check service providers when necessary and may receive personal information from them.

6 To whom do we disclose personal information?

We process your personal information primarily ourselves and use service providers that process personal information for us. To make the recruitment process as smooth as possible, we use the TalentAdore recruitment platform for processing job applications. The platform is operated by our service provider Talentadore Oy. In case of possible aptitude assessments or background or employment checks, we may use a partner that processes personal information for us as a service provider. Note that some of these third parties may also maintain additional privacy policies and notices on behalf of Bluefors.

When using service providers, we enter into data processing agreements with them as required by law and ensure that each service provider is bound by confidentiality obligations regarding your personal information.

We may disclose your personal information to our affiliates Bluefors Oy (located in Finland) and Bluefors GmbH (located in Germany).

We may disclose your personal information to relevant third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

We may also be required by law to disclose your personal information, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to government requests, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes.

7 How do we protect your personal information?

We implemented appropriate technical, physical and organizational measures designed to protect your personal information against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorized disclosure or access as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing.

Only those of our employees and service providers, who due to their working duties need to process job applicant data, are entitled to use data systems containing personal information of the job applicants. Personal information is processed in systems and databases protected by firewalls, passwords, and other appropriate technical and organizational measures. The databases and the backup copies of them are stored in locked premises and can be accessed only by certain pre-designated persons.

You acknowledge and accept that, despite our efforts, there may be times or situations when your personal information is inadvertently disclosed by us or by a third party to whom we have disclosed your personal information. You hereby accept that risk and waive any and all claims, causes of action, damages and liability against us in the event of such inadvertent or negligent disclosure of personal information.

8 For how long do we store your personal information?

We keep your application and any other personal information that we have collected for the purpose of the recruitment process until the recruitment has been completed and for a period of six months thereafter. If you sign up to our talent community, we process your personal information as long as we consider your profile relevant to us, but no longer than twelve months from the date that you signed up. We will send you a reminder of your profile's expiration and you may choose to update your profile and renew the processing period of your profile and personal information.

If the job applicant is employed by Bluefords, the relevant personal information will be transferred to our employee register and processed for employment purposes in accordance with our employee privacy policy.

9 Cross border transfers

The submission of job applications for positions in the United States through our recruitment platform is intended for use by job applicants located in the United States. If you visit the recruitment platform from a country other than the United States, your communications will likely result in the transfer of your personal information across national borders. Our servers or offices may be located in countries other than the country from which you access the recruitment platform, also resulting in the transfer of your personal information across international borders. If you provide your personal information when visiting the recruitment platform from outside of the United States, you acknowledge and agree that this information may be transferred from your then current location to our offices and servers and to those of our affiliates, agents, and service providers located in the United States and in other countries. The United States and such other countries may not have the same level of data protection as those that apply in the jurisdiction where you live.

10 Links to third party sites

This Privacy Policy applies only to our recruitment platform. The recruitment platform may at times contain links to other websites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy policies of such other websites or how these websites operate or treat your personal information.

In no event will we be responsible for the information contained in such links or websites, their practices or for your use of, or inability to use, such links or websites or their services, or transmissions received from such websites. By using the recruitment platform, you expressly relieve and discharge us from any and all liability arising from your use of any third-party website. We encourage you to be aware of this when you leave the recruitment platform and to read the privacy policies and terms of use associated with each of any third-party websites that may collect personal information.

11 Your privacy rights

Please inform us of any changes or updates to your information and your preferences by contacting us through the contact details identified in Section 1 above or using the features available on our recruitment portal.

Depending on your country of residence and subject to applicable laws, you may have certain choices and rights in relation to information about you.

- *Right to access, rectification, and restriction:* You have the right to request access to your personal information. This includes the right to be informed of whether we process your personal information, what personal information is being processed, and the purpose of the processing. You also have the right to request correction of any inaccurate or incomplete personal information. In certain situations, you may also request the restriction of processing of your personal information.
- *Right to erasure:* You may also request that your personal information be erased if the personal information is no longer necessary for the purposes for which it was collected, the processing is unlawful, or the personal information must be erased to enable us to comply with a legal requirement.
- *Right to withdraw your consent:* If the processing of your personal information is based on your consent, you have the right to withdraw your consent to such processing at any time, without affecting the lawfulness of processing based on consent before its withdrawal.