

Privacy Statement of Halton Oy's Recruitment Data Filing System

1 General

Halton Oy (later "Company" or "We") is committed to ensure the confidentiality and data protection of personal data at its possession. This privacy statement is applied to personal data that we collect in relation to our recruitment data filing system (later "Data Filing System"). The personal data and related processing is described in this privacy statement. Additional information regarding the processing of personal data in the Data Filing System is provided by our contact person Kenny Niutanen, People and HR Director (kenny.niutanen(at)halton.com) .

We may update this privacy statement from time to time, for example due to changes in applicable legislation. We endeavour to carry out reasonable means to inform you of any possible changes and their effects in due time beforehand. Therefore, we advise you to review this privacy statement always after receiving a notice of changes regarding the privacy statement. This privacy statement was last updated on 27/11/2019.

2 Data Controller

Name: Oy Halton Group
Address: Haltonintie 1-3
47400 Kausala
Tel: +35820792200
Business ID: 0535372-9

3 Whose Personal Data Do We Collect?

We process the personal data of our job applicants (later also "Job Applicant" or "You") in the Data Filing System.

4 What Categories of Personal Data Do We Process?

We process the personal data you have provided us with your job application in the Data Filing System. Such categories of personal data may include:

- your name;
- your contact details: telephone number, address and email address;
- your date of birth;
- name and contact details of your referees;
- your prior work experience, education and other professional background;
- evaluations made by the people taking part in our recruitment process and other similar information; and
- other information you have provided us with.

5 Which Sources Do We Use to Collect Personal Data?

We collect personal data from the job applicants themselves and from our employees who are taking part in the recruitment process. We may collect personal data also from aptitude test providers or your referees.

6 Basis for, Purposes and Impacts of Processing Your Personal Data

The basis for processing your personal data is **our legitimate interest** for the evaluation of your job application and for carrying out of the recruitment process.

The purpose of the processing of personal data is to carry out our recruitment processes and save the data of potential job applicants for later recruitment purposes. This includes i.e. the evaluation of job applicants for recruitment purposes, communications with job applicants and other measures related to

the recruitment process. The processing of your personal data will have no other impacts on you than the completion of each recruitment process.

Please note that as a job applicant you are responsible for obtaining necessary authorisations and consents for processing the personal data of any referees you name.

We do not further process your personal data for other purposes than those described in this privacy statement.

7 Regular Disclosures and Transfers of Your Personal Data to Third Parties

We do not disclose your personal data to third parties.

However, we may transfer your personal data to our service providers in order to be processed on our behalf. Our current service providers are:

- Recruitment consultants and recruitment companies that have a contractual relationship with our Company
- Halton Oy (IT system provider)

Our service providers may process your personal data only for the purposes stated in this privacy statement. We always ensure that our partners do not process the personal data transferred to them for any other purposes.

We do not disclose or transfer your Personal data to parties that have no relation to the recruitment, e.g. for direct marketing or other similar purposes. However, we may be required to share your personal data with competent authorities in accordance with data protection legislation.

8 Transfers of Your Personal Data outside the EU or European Economic Area

We do not transfer your personal data outside the European Union or European Economic Area.

9 Principles for the Retention of Your Personal Data

Should you send us an open application, we retain the application and the personal data in our system for twelve (12) months following the submission of the application after which we destroy them. Should you apply for a specific vacant post, the application and the personal data shall be stored for twelve (12) months after which we destroy them.

We may, however, retain personal data for a period of two years if the personal data is necessary for the defense of legal claims provided for in legislation, such as any personal data that has affected the recruitment decision.

10 Rights of a Data Subject in Relation to the Processing of Personal Data

You have the right to, according to applicable data protection legislation, at any time:

- be informed about the processing of your personal data;
- obtain access to data relating to you and review your personal data we process;
- require rectification and completion of inaccurate and incorrect personal data;
- require erasure of your personal data
- object to the processing of your personal data; and
- obtain a restriction of processing of your personal data.

Please note that objecting to the processing or erasure of your personal data may lead to a situation where it is not possible for us to consider your application in the recruitment process.

You should present your request for exercising any of the aforementioned rights in the manner described in the 'Contacts' Section of this privacy statement. We may ask you to specify your request in writing and to verify your identity before processing the request. We may refuse to fulfil your request on grounds set out in applicable data protection legislation.

You also have the right to lodge a complaint with the supervisory authority concerned or with the supervisory authority of the EU member state of your habitual residence or place of work, if you consider that we have not processed your personal data in accordance with applicable data protection legislation.

11 Principles of Data Security

We respect the confidentiality of your personal data. Description of data security measures: E.g. tangible material containing personal data shall be kept under lock and keying a space to which only separately appointed persons have access. Personal data processed digitally are protected and stored in our information system accessible to persons on a need-to-know basis only. Such persons have personal user credentials and passwords. We encrypt Personal data transmitted outside our Company

12 Contacts

All requests concerning the use of the rights mentioned above, questions about this privacy statement and other contacts should be made by e-mail to Aki Saxén, Chief Information Security Officer, to the address privacy@halton.com. You may also contact us in person in our offices or in writing:

Oy Halton Group Ltd
Aki Saxén
Haltonintie 1-3
47400 Kausala, Finland