



1 Controller	Name Elo Mutual Pension Insurance Company
	Address Revontulentie 7, 02100 Espoo
	Other contact information Phone 020 703 50
2 Data protection officer in matters related to the filing system	Name Hilkka Malinen
	Address Revontulentie 7, 02100 Espoo
	Other contact information Phone 020 703 5687
3 Name of the filing system	Filing system for job applicants.
4 Purpose of and legal basis for the processing of personal data	<p>Elo processes the personal data of job applicants for the purpose of managing the recruitment process, for example, in order to process job applications, to communicate on the recruitment process and to arrange job interviews. In addition, the personal data of job applicants is used in the employee selection process, including the aptitude assessment of job applicants.</p> <p>The legal basis for the processing of the job applicants' personal data is the taking of measures based on the job applicant's request prior to possible employment and the conclusion of an employment contract. Any aptitude assessments of job applicants are based on the job applicant's consent. Data Subjects have the right to withdraw their consent to the processing of personal data at any time. However, the withdrawal of consent has no effect on the lawfulness of any processing of personal data that has taken place before the consent was withdrawn.</p>
5 Data content of the filing system	<p>The categories of Data Subjects include the following:</p> <ul style="list-style-type: none"> - Persons applying for a job at Elo <p>Elo collects information concerning the job applicants that is necessary for the recruitment process. For example, the following personal data is collected:</p> <ul style="list-style-type: none"> - Basic information, such as name and contact details - Information included in the job application or data otherwise relevant to the position to be filled, for example, information on the applicant's education, prior work experience, qualifications and other skills, language skills and references - Information relevant to the recruitment process, such as the status of the applicant's application process, notes prepared on the applicant to support the recruitment process, information on aptitude assessments and information on the final decision concerning the position applied for. <p>In some cases, Elo collects data concerning personal credit ratings, the results of drug tests and/or security clearances when hiring employees for certain specified positions. Applicants are informed in advance of any credit rating checks, drug tests and/or security clearances, and they are asked</p>



	<p>to provide their consent for such measures in advance. Only job applicants in the final phase of the recruitment process, who will be selected for the position provided that the personal data in question does not prevent the selection, will be subject to a credit rating check, drug test and/or security clearance.</p> <p>During the recruitment process, Elo may become aware of other personal data concerning the job applicant, based on information that the job applicants provide voluntarily. Elo does not require such other personal data in connection with the recruitment process and, as a rule, Elo does not retain such personal data, unless it is included, for example, in application forms filled in by the job applicant or in similar documents, the storing of which is justified with regard to other personal data.</p>
6 Sources of personal data	<p>As a rule, Elo collects all personal data concerning job applicants from the applicants themselves. In certain situations, Elo may also collect information on a job applicant from sources other than the job applicant within the limits of the applicable legislation, mainly with the job applicant's consent or as otherwise allowed by legislation, for example, from the following parties:</p> <ul style="list-style-type: none">- References provided by the job applicant (such as former employers)- External recruitment partners- The service provider conducting the aptitude assessment of the job applicant- Suomen Asiakastieto Oy (personal credit rating)- Finnish Security Intelligence Service (security clearances) or- Representatives of occupational health care (drug test results when the job applicant does not provide the test results to the employer but has provided his or her consent for the occupational health care to deliver the results directly to Elo). <p>Newsec Asset Management Oy carries out access control measures and camera monitoring on Elo's premises, and these measures may also collect personal data on job applicants. Further information is available in the privacy statement concerning access control and camera monitoring at Elo.</p>
7 Recipients of personal data and categories of recipients	<p>Elo can transfer and disclose the personal data of job applicants to third parties in the following cases:</p> <ul style="list-style-type: none">- To trusted external service providers (such as an external company conducting aptitude testing) who work on behalf of Elo and have no independent right to use the personal data that Elo transfers to them- Merger and acquisition transactions in which Elo participates and- When Elo believes in good faith that it is necessary to disclose information in order to protect Elo's rights and fulfil its obligations, to protect the rights of job applicants and other parties, to investigate frauds or to respond to requests made by authorities.
8 Transfers of personal data to countries outside the EU or EEA	<p>Elo does not transfer the personal data of job applicants to countries outside the EU or EEA</p>
9 Principles concerning the protection of personal data	<p>Elo has implemented the required technical and organisational information security measures to protect personal data from loss, destruction, misuse and unauthorised access to data. For example, we limit the access to the personal data of job applicants so that the data in question can only be accessed by those HR employees whose work requires them to process the data.</p>



10 Retention period of personal data	<p>Personal data is retained only for as long as necessary for the purposes defined in this privacy statement or in accordance with retention periods set out in legislation. For example, the legislation on equal opportunities and equality requires us to retain your personal data for one year from the end of the recruitment process.</p> <p>The personal credit rating data, drug test results and/or security clearance data of job applicants is not retained after such data has been checked. Elo will not process such personal data any further and will erase it.</p> <p>When the retention period applicable to personal data has ended, and there are no further grounds for the processing of the data within the limits of data protection legislation, the personal data will be erased.</p>
11 Right to check personal data	<p>Data Subjects have the right to request access to their personal data and obtain a copy of the processed personal data and any necessary information related to the processing within the limits of and in accordance with data protection legislation.</p> <p>Requests concerning the checking of data must be submitted in writing or by visiting Elo in person. Requests concerning the checking of data must be addressed to the contact person defined in this privacy statement.</p>
12 Right to rectification	<p>Data Subjects have the right to demand that incorrect or erroneous personal data is rectified or completed without undue delay within the limits of and in accordance with the applicable data protection legislation.</p> <p>Requests concerning the rectification of data must be presented in writing, either in electronic format or manually. Requests must be addressed to the contact person defined in this privacy statement.</p>
13 Right to erasure	<p>Data Subjects have the right to demand that personal data is erased within the limits of and in accordance with the applicable data protection legislation, for example, if the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed. The right to have personal data erased does not apply if, for example, personal data is processed in order to comply with legal obligations.</p> <p>Regarding personal data that has been collected with the Data Subject's consent, the Data Subject has the right to demand that data is erased, for example, if the Data Subject withdraws his or her consent to the processing and there are no other legal grounds for the processing.</p> <p>Requests concerning the erasure of data must be presented in writing, either in electronic format or manually. Requests must be addressed to the contact person defined in this privacy statement.</p>
14 Right to restriction of processing	<p>Data Subjects have the right to restrict the processing of personal data within the limits of and in accordance with the applicable data protection legislation.</p> <p>For example, Data Subjects have the right to restrict the processing if Elo no longer needs the personal data for processing purposes, but it is required by the data subject for the establishment, exercise or defence of legal claims.</p> <p>Requests concerning the restriction of processing must be presented in writing, either in electronic format or manually. Requests must be addressed to the contact person defined in this privacy statement.</p>



15 Right to data portability	<p>Data Subjects have the right to receive such personal data concerning them that they have provided to Elo in a structured, commonly used and machine-readable format, and Data Subjects have the right to transmit such data directly to another controller within the limits of and in accordance with the applicable data protection legislation.</p> <p>In principle, Data Subjects have the right to demand that personal data that is collected based on consent or an agreement, provided by the Data Subject and processed automatically be transferred either to the Data Subject or directly to the system of another controller, provided that it is technically feasible.</p>
16 Right to object	<p>Within the limits of and in accordance with the applicable data protection legislation, Data Subjects have the right to object to the processing of their personal data, for example, concerning the processing of personal data based on the controller's legitimate interest.</p> <p>Notifications concerning objections must be submitted in writing, either in electronic format or manually. Requests must be addressed to the contact person defined in this privacy statement.</p>
17 Other rights related to the processing of personal data	<p>Data Subjects always have the right to lodge a complaint with a supervisory authority if, in the Data Subject's opinion, his or her personal data has been processed contrary to the provisions of the General Data Protection Regulation.</p> <p>If the Data Subject is of the opinion that his or her legal rights have been violated, the Data Subject has the right to lodge a complaint with the national data protection authority (in Finland, the Data Protection Ombudsman: http://www.tietosuoja.fi) or other data protection authority in the European Union or European Economic Area.</p> <p>The requests made by Data Subjects concerning the exercising of their rights must be addressed to the data protection officer responsible for this filing system. The contract details are provided in section 2 of this privacy statement. Requests can be submitted via encrypted email or by letter. The request must identify the requester (name, personal identification number), the scope of the request and the actions required to be taken.</p> <p>Any communication and actions taken based on requests made by the Data Subject are primarily provided free of charge, unless the requests are manifestly unfounded, excessive or recurring. In that case, Elo can also refuse to act on the request.</p>