

**PRIVACY STATEMENT
RECRUITMENT REGISTER**

Updated 26 May 2020

1. Controller	Name Terramare Oy
	Address Laurinmäenkuja 3A, 00440 Helsinki
	Other contact information (e.g. phone during working hours, email address) +358 9 613 621, terramare@boskalis.com
2. Data protection officer/contact person responsible for matters concerning the register	Name Pirjo Akselin
	Address Laurinmäenkuja 3A, 00440 Helsinki
	Other contact information (e.g. phone during working hours, email address) +358 9 613 621, pirjo.akselin@boskalis.com
3. Name of the personal data file system	Terramare's Recruitment Register
4. Legal basis and purpose of processing	<p>This privacy statement describes how personal data are collected and processed in connection with Terramare's recruitment processes.</p> <p>The processing of personal data is based on Terramare's legitimate interest in receiving and processing job applications, managing the recruitment process, enabling necessary contacts and making decisions in the performance of its working tasks. Personal data contained in the recruitment register may also be processed on the basis of legitimate interest in demonstrating the equal treatment of job applicants and to prepare for and respond to legal claims. In certain cases, the processing of personal data is necessary in order to take measures prior to concluding an employment contract between Terramare and the job applicant and to implement the employment contract.</p> <p>Processing of personal data related to background and security checks is based on the consent of the job applicant. The job applicant's consent is also the basis of processing when personal data are collected from a referee nominated by the job applicant.</p> <p>The basis for processing personal data obtained via open applications is the consent of the applicant. If personal data are processed in some specific recruitment process, the basis for processing personal data is the same as described above.</p>

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5. Data content of the register

The register contains the following personal data, which are essential for selecting individuals and which might vary depending on the job vacancy in question:

Basic information:

- Last name, first names
- Contact information (telephone number, email address and postal address)
- Date of birth (when required by the job in question)
- Nationality, work permit if necessary
- Positions of trust if necessary
- Possible other information provided by the job applicants themselves

Information related to the job application:

- Work experience justified with respect to the job in question (employment and education history), qualifications, expertise and language skills
- Referees
- Key skills
- Applicant's own free-form presentation
- Any other information provided by the job applicant in the course of the job application process or otherwise specifically published for a professional purpose, such as a LinkedIn profile

Information arising during the recruitment process in relation to assessing the applicants:

- Information related to the progress of the recruitment process
- Application-related notes
- Possible interview information and interview notes
- Referees and person's consent to contact referees
- Results of suitability assessment
- Results of background and security checks

The employer's representatives participating in the recruitment process prepare a recruitment memorandum of information arising and observations made during the process, and this memorandum is archived with the applicant's other information.

The basic information of the person selected for the job and information related to the job application is transferred to Terramare's human resources register.

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RECRUITMENT REGISTER**

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6. Normal sources of information	<p>Information is generally obtained from the job applicants themselves. In addition, with the consent of the job applicant, information may be collected from referees, suitability assessment service providers, recruitment consultants or from the authorities when a background or security check is required.</p> <p>By submitting a job application, the job applicants give their consent for their information to be collected from a profile published for a professional purpose to the extent that the collection of the information is necessary and is related to the performance of the work, taking into account the job vacancy.</p> <p>Information also arises during the application process when observing a person's actions.</p>
7. Recipients of personal data	<p>Personal data are not, as a rule, disclosed to third parties unless the data subject's consent to disclosure has been requested and received, for a suitability assessment, for example.</p> <p>Data may be disclosed within the Group, in which case some other company belonging to the Group may process personal data on Terramare's behalf. This procedure is based on Terramare's legitimate interest to transfer personal data between Group companies for administrative purposes, such as for reporting data or practising efficient business operations, for example when utilising the Group's information systems.</p> <p>Terramare mainly processes personal data itself, but also uses in data processing service providers that act on its behalf. Such service providers include, for example, IT service providers that handle the technical maintenance of systems and servers, and headhunting companies that may assist the company in recruitment processes.</p> <p>Terramare has attended to data protection with service providers, for example by preparing processing agreements on the processing of personal data.</p> <p>Terramare may disclose personal data contained in the recruitment register</p> <ul style="list-style-type: none">- to parties, such as Employment and Economic Development (TE) Offices, that have a legal or contractual right to receive data from the register;- in connection with mergers, business acquisitions and business restructurings;- in response to a request from a public authority;- with the consent of the data subject, to parties to whom such consent applies, for example referees.

**PRIVACY STATEMENT
RECRUITMENT REGISTER**

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8. Storage of personal data	<p>Personal data are stored only for as long as this is necessary to implement the purposes specified in this statement.</p> <p>Personal data processed in the recruitment process are stored with regard to the individual selected for the job in question for the duration of the employment relationship and for two years after its termination. The data of individuals not selected are stored, as a rule, for one year from the termination of the recruitment process or until they are no longer needed due to the action or limitation periods laid down in law.</p> <p>Open applications are stored for two years from the date of receipt of the application or until the data subject withdraws their consent, for example by requesting that their data be erased from Terramare's recruitment register. Data are deleted on request, unless there is some other justification for their storage.</p>
9. Principles of personal data protection	<p>The principles of personal data storage are set out in the Group's information security guidelines. Personal data are processed confidentially and processors are bound by professional secrecy. Only those employees whose job description so requires are entitled to access systems and materials containing personal data. Terramare has in place measures to ensure that no personal data about data subjects that are inappropriate, out of date or incorrect for the purposes of processing are stored in the register.</p> <p>The personal data of the recruitment register are protected by the necessary technical and organisational measures. Terramare has in place security measures to protect against viruses and malware. The security measures are updated regularly.</p> <p>The data are processed in databases that are protected by firewalls, passwords and other technical means. Each user has their own system username and password, on the basis of which all log-ins to the system can be authenticated. The databases and their backups are located in locked premises and can only be accessed by designated individuals.</p> <p>Manual personal data are stored in locked cabinets. Office premises are locked and access to premises is only possible by people belonging to Terramare's personnel and by employees of service providers who must have access to premises to perform their work. The premises have camera surveillance. Materials containing personal data are destroyed in a reliable way.</p>

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RECRUITMENT REGISTER**

Updated 26 May 2020

10. Transfer of data outside the EU or the EEA	<p>Data are not, as a rule, transferred outside the EU or the European Economic Area (EEA).</p> <p>However, the IT management systems used by Terramare may allow a service provider to access the data from outside the EU/EEA, for example to provide technical support. In some cases, Terramare's partners may also process personal data outside the EU/EEA when executing an assignment. If personal data are processed outside the EU or the EEA, Terramare ensures that its service provider or partner is bound by the European Commission's model clauses on the processing of personal data.</p>
11. Rights of data subjects	<p>Data subjects have the right to inspect the data concerning them that are stored in the recruitment register and to request the correction of incorrect or inaccurate data or the deletion of their personal data if there are legal justifications for this. If processing of personal data has been based on consent, the data subjects have the right to withdraw their consent.</p> <p>The controller may, on its own initiative or on the request of the data subject, supplement, correct or delete incomplete, inaccurate or out-dated personal data.</p> <p>Insofar as data subjects have themselves submitted data to the register that are processed on the basis of consent or agreement, the data subjects have the right to receive such information in a machine-readable format and the right to transfer these data to another controller.</p> <p>For specific personal reasons, data subjects have the right to object to the processing of personal data concerning them where the basis of processing is the legitimate interest of the controller or the processing is necessary for the performance of a task in the public interest. In connection with such requests, data subjects must specify the particular situation on the basis of which they object to the processing. The controller may refuse to execute the request only on grounds provided for in law.</p> <p>Data subjects have the right to request a restriction on the processing of their personal data and the right to file a complaint about the processing of personal data with the supervisory authority. The supervisory authority in Finland is the Office of the Data Protection Ombudsman (tietosuoja(at)om.fi).</p>
12. Contacts to exercise rights	<p>Enquiries and requests regarding the personal data processing described in this privacy statement may be addressed to the contact person mentioned at the beginning of the statement. It is requested that contacts be made in writing or in person.</p>
13. Changing the privacy statement	<p>Terramare updates the privacy statement to correspond with current policy. The up-to-date privacy statement is available on Terramare's website and the date of the most recent update is marked at the beginning of the privacy statement.</p>