

## **Privacy Notice – Recruitment Register**

*This privacy notice is an AI-generated translation. The legally valid privacy notice is available in Finnish*

## **Privacy Notice – Recruitment Register**

### **1. Name of the Register**

Recruitment Register of the Industrial Union (Teollisuusliitto ry)

### **2. Controller and Contact Person**

#### **Controller**

Industrial Union (Teollisuusliitto ry)

Business ID: 0201717-2

#### **Contact for Data Protection Matters**

Email: tietosuojavastaava@teollisuusliitto.fi

Tel: +358 20 774 001

Industrial Union / Data Protection Officer

P.O. Box 107, FI-00531 Helsinki, Finland

### **3. Categories of Data Subjects**

This register contains personal data of individuals who have applied for employment or assignments at the Industrial Union.

Personal data of applicants selected for employment will be transferred to the Union's personnel register upon the conclusion of an employment contract or an equivalent agreement.

Personal data of individuals applying for positions of trust will become part of the Union's register of elected representatives.

### **4. Purpose and Legal Basis for Processing**

Personal data is processed to carry out the recruitment of new employees and to evaluate and develop the recruitment process.

The legal bases for processing are:

- **Compliance with legal obligations**
- **Performance of a contract** or steps taken prior to entering into a contract
- **Consent** of the data subject, where applicable
- **Legitimate interest** of the controller

### **5. Personal Data Processed in the Register**

The register may contain the following categories of personal data:

- Name
- Contact details and address

## Privacy Notice – Recruitment Register

*This privacy notice is an AI-generated translation. The legally valid privacy notice is available in Finnish*

- Photograph
- Information provided by the applicant, such as:
  - Work and volunteer experience
  - Educational background
  - Positions of trust
  - Other information relevant to the recruitment process, e.g. interests, motivation
- Notes made by the controller regarding the applicant and the recruitment process

### 6. Special Categories of Personal Data

As a rule, the register does **not** contain special categories of personal data (e.g. health information or trade union membership).

Special category data may only be processed if voluntarily provided by the applicant.

### 7. Personal Data Retention Period

Personal data is retained until the recruitment process has been completed, based on the steps taken to enter into an employment contract.

After the recruitment process has ended, data may be retained **until the end of the third calendar year** following the conclusion of the process.

This enables the controller to contact applicants regarding future recruitment opportunities.

Retention in this context is based on the **legitimate interest** of the controller.

### 8. Regular Sources of Information

Personal data is primarily obtained directly from the applicant.

If the controller collects information from other sources, **separate consent** from the applicant will be requested.

For applicants to civilian service positions, certain data may be obtained from the civilian service register *Sivariweb*.

### 9. Rights of the Data Subject

The rights of the data subject are regulated by the EU General Data Protection Regulation (GDPR) and the Finnish Act on the Protection of Privacy in Working Life.

Within these legal limits, the data subject has the right to:

- Receive information about the processing of their personal data
- Access their personal data

## Privacy Notice – Recruitment Register

*This privacy notice is an AI-generated translation. The legally valid privacy notice is available in Finnish*

- Request rectification of inaccurate or incomplete data
- Request erasure of personal data when:
  - processing is based on consent
  - erasure is not in conflict with statutory obligations or public interest
  - the data is no longer necessary for its original purpose
- Withdraw consent and object to processing insofar as the processing is based on consent
- Receive their personal data in a machine-readable format and transfer it to another controller, provided that:
  - the data was supplied by the applicant
  - processing is based on consent
  - processing is automated
- Lodge a complaint with a supervisory authority
- Request restriction of processing

Requests must be submitted using the contact details in section 13.

The controller may request verification of identity and may refuse a request where permitted by law.

### 10. Disclosure and Transfer of Personal Data

Personal data may be disclosed to another controller only if the data subject has given **explicit consent** at the time of submitting their information or afterwards.

In this context, “another controller” does **not** refer to subcontractors, but to entities that process personal data for their own independent purposes.

Applicants for civilian service accept, upon logging into the *Sivariweb* service, that both the Industrial Union and Sivariweb will process their personal data.

The Industrial Union may use subcontractors to carry out recruitment and related functions. Personal data in the recruitment register may be processed by:

- Technical service providers, such as cloud service providers
- Recruitment platform providers

### 11. Transfers of Personal Data Outside the EU/EEA

As a rule, personal data in the recruitment register is **not** transferred outside the EU/EEA.

If personal data is processed outside the EU/EEA, the Industrial Union ensures that such processing is carried out:

- in accordance with applicable legislation, and

## Privacy Notice – Recruitment Register

*This privacy notice is an AI-generated translation. The legally valid privacy notice is available in Finnish*

- using GDPR-compliant safeguards

Personal data may be processed in cloud services located outside the EU/EEA if the service provider has committed to GDPR compliance.

### 12. Data Security

Digitally processed personal data is protected and stored in systems managed by the Industrial Union, with access limited to individuals who require the data for their work duties. These persons use personal usernames and passwords.

Storing personal data on paper is avoided.

Personal data sent outside the Union is encrypted.

Workstations and storage media used in processing personal data are also encrypted.

### 13. Contact Information

Requests regarding data subject rights, questions about this Privacy Notice and other enquiries may be submitted by email to:

**tietosuojavastaava@teollisuusliitto.fi**

Alternatively, contact may be made personally or in writing at:

Data Protection Officer

Industrial Union (Teollisuusliitto ry)

P.O. Box 107, FI-00531 Helsinki

Tel. +358 20 774 001

### 14. Updates to This Privacy Notice

This Privacy Notice may be updated from time to time, for example due to changes in legislation or official guidance.

**Last updated: 14 October 2025**