



# PRIVACY POLICY – RECRUITMENT DATA BASE OF TIKKURILA

The purpose of this Privacy Policy is to provide job applicants with information on how their personal data is processed in Tikkurila during the recruitment process. Tikkurila is committed to respecting the privacy of the candidates and to following the applicable laws and regulations applicable to personal data, such as the European General Data Processing Regulation (2016/679) and any applicable national laws.

## 1. Data Controller with Respect to Personal Data of Job Applicants:

Tikkurila Oyj, Heidehofintie 2, FI-01301 Vantaa, Finland,

or in case of recruitments outside of Finland, the local Tikkurila company which is searching to recruit a new employee:

Poland: Tikkurila Polska SA. ul. Mościckiego 26, 39-200 Dębica

Sweden: Tikkurila Sverige AB, Textilgatan 31, S-120 86, Stockholm

## 2. Contact Details Related to the Personal Data:

Any requests related to processing of applicants' personal data can be made to:

Finland: [tietosuoja@tikkurila.com](mailto:tietosuoja@tikkurila.com)

Poland: [inspektor.odo@onet.pl](mailto:inspektor.odo@onet.pl) and [OchronaDanychOsobowych@tikkurila.com](mailto:OchronaDanychOsobowych@tikkurila.com)

Sweden: [persondataskydd@tikkurila.com](mailto:persondataskydd@tikkurila.com)

In case recruitments are carried out by Tikkurila companies which are located outside of Finland, Sweden or Poland, different privacy principles apply. The privacy policies applicable to such recruitment processes are communicated to the applicants in separate documents/communications methods.

## 3. The Purposes and Legal Grounds of Processing the Personal Data

### 3.1. The Purposes

Tikkurila's recruitment database contains personal data of job applicants. Processing is necessary for the purposes of enabling and carrying out the recruitment processes, concluding employment contracts with the selected candidates and implementing labor law related rights and obligations.

### 3.2. Legal Grounds

#### 3.2.1. Legitimate Interest

Processing of the applicants' personal data is based on Tikkurila's legitimate interest (article 6(1)(f) of the European General Data Protection Regulation 2016/679) to enable and carry out recruitment processes.



### **3.2.2. Compliance with Statutory Obligations**

Tikkurila may process personal data also in order to demonstrate compliance with the statutory obligations related to the selection of employees and potential employment relationship and to prepare and present a legal claim or to defend it (article 6(1)(c)).

### **3.2.3. Consent**

In some cases, the processing is based on the consent of the applicant, for example in case of carrying out suitability and personality assessments or in case application is asked to be used to find suitable candidates for other vacancies at Tikkurila than what the candidate had originally applied for (article 6(1)(a)).

### **3.2.4. Actions Preceding the Conclusion of an Employment Contract**

In case the applicant is recruited to Tikkurila, the data is processed to conclude an employment contract with the selected applicant (article 6(1)(b)).

### **3.2.5. Additional Remarks Concerning Recruitment in Poland**

Additionally in Poland: Your data will be processed within limits set by the law (article 22<sup>1</sup> of the Labour Code and article 6 (1)(c) of the European General Data Protection Regulation). In case you provide other data than listed in article 22<sup>1</sup> of the Labour Code, express interest in participating in future recruitments or provide data listed in article 9(1) of the European General Data Protection Regulation your data will be processed based on your consent (article 6 (1)(a) of the European General Data Protection Regulation).

## **4. Content of the Register and Source of the Data**

The recruitment database contains data submitted by the applicants by themselves and in case of suitability and personality assessments, data received from external service providers who assist Tikkurila in such assessments. Tikkurila's representatives involved in the recruitment process may also add notes during the process. The data in the register includes for example the following:

- a. name, contact information (telephone number, e-mail address, home address, LinkedIn address)
- b. date of birth from final candidate
- c. National ID (Finland) from final candidate
- d. Gender (Finland) from final candidate
- e. information for assessing the competence of the applicant, such as education, work experience, language skills and other relevant skills
- f. attachments (CV, cover letter, photo)
- g. potential data concerning references and contact details related thereto
- h. any other information given voluntarily by the applicant
- i. information given by the applicant during interviews, e-mail exchange and other communications with the applicant
- j. notes made by representatives during the recruitment process
- k. potential results of personality and suitability assessments



- I. consents given by the applicant to use the application in other recruitment processes, consents for personal assessments

## **5. Regular Transfers of Data and Transfers of Data Outside of the EU or the EEC**

Tikkurila may share the applicant's personal data with other companies belonging to Tikkurila Group and to such third-party service providers who are authorized to process the data on behalf of Tikkurila. Tikkurila ensures that outsourcing takes place within the rules of the applicable law. The service providers are only allowed to use personal data to provide agreed recruitment-related service to Tikkurila and according to the terms and conditions agreed with Tikkurila.

The servers which are used for processing personal data in connection with recruitment are located within the European Economic Area. Tikkurila may transfer your personal data outside the country where the data is being processed and outside of EU/EEA for example to a representative of Tikkurila working from a third country. Tikkurila is committed to making sure that such transfer is allowed according to the applicable legislation, especially by using the standard contracts of the European Commission for the transfer of personal data to third countries, and that your data is appropriately protected regardless of the geographical location. Please refer to the abovementioned contact details for additional information.

## **6. Deletion of Personal Data**

Tikkurila stores the job applications in the database for one year after it's been submitted to Tikkurila. Data concerning recruited individuals are stored in Tikkurila's HR system during the period of time defined in employee data privacy policy.

## **7. Principles of Register Security and Internal Use**

Tikkurila has established electronic and administrative safeguards designed to make the information collected secure. The system is protected according to Tikkurila's Information Security Policy.

Only appointed personnel of Tikkurila and of organizations operating by Tikkurila's assignment or on behalf of Tikkurila are entitled to access data. Access is given only to persons being involved in the recruitment process, and systems containing personal data can only be accessed with usernames and passwords. All persons processing the application have a personal right of use granted by the controller. All personnel of Tikkurila and its subcontractors are obliged to keep the information of the personal data which they obtain in their work confidential.

All data flow from user's browser and the recruitment database is protected with encryption. The servers used for the database are located in a locked space with strict access control.



## **8. Your Rights Concerning Personal Data**

Based on the applicable law, applicants have certain rights with respect to their personal data. Many of these rights can be used by accessing the recruitment database with the applicant's own user credentials which have been created in connection with submitting the application.

For example, you have a right to

- a. know whether Tikkurila is processing your personal data and ask for a copy of your data stored in the recruitment database
- b. prohibit Tikkurila from processing personal data in case there are no legal grounds for the processing activities
- c. ask Tikkurila to restrict processing the data in case there is a valid justification for restricting the processing
- d. ask for rectification of incorrect personal data or have incomplete personal data completed;
- e. ask for erasure of personal data, in case there are no legal grounds for processing the data. You may also edit the personal data concerning yourself in the recruitment database after submitting it
- f. ask for transferring the personal data from the system in a machine-readable form
- g. withdraw your consent with respect to such processing activities that you have given your consent for.

The requests for the abovementioned matters are asked to be made to the contact person / contact email mentioned above. You may also change a part of the data by yourself in the recruitment portal or to request deletion of data through the portal.

You have also a right to make a claim to the EU member state's supervisory data protection authority in case you consider that Tikkurila has breached the applicable legislation concerning the processing of personal data. The claim can be made to the supervisory authority in the applicant's country of residence, country of work or country of the alleged breach of data protection legislation.

## **11. Changes to the Privacy Policy**

Tikkurila is entitled, from time to time, change the information in this Privacy Policy as well as its practice to handle data subject' personal data.

## **12. Automated processing and profiling**

Your data are not subject to automated processing nor profiling.

## **13. Cookies**

### **13.1. Cookies on Workday**

Tikkurila's Workday Career site uses cookies to facilitate the use of the site:



- Cookie name: Enable PrivacyTracking

Shows privacy message for user to acknowledge based on the site cookie message policy.

- Cookie name: JSESSIONID\*

The http session ID in order to identify the session. The user can opt to use this cookie by taking into use the LinkedIn Quick Apply feature when in use on the career site.

Additional Cookie stored information:

- The language/locale code for the language selected by the user;
- The browser and operating system information;
- The time zone of the user accessing the page;
- Whether a session is a shared session;
- The server ID for the particular session for purposes of distributing traffic amongst servers.

Workday Recruiting uses cookie technology (Redis Cache) to track a candidate's user session on the external career site. The cookie solely contains a private ID that is used to look up a user's session from their device to our external career site servers. The cookie has no actual personal details (session or cache information) in it. Additionally, 3rd party cookies are not used.

### **13.2. Cookies on Tikkurila Websites**

Additionally, the Cookie Policy on Tikkurila's websites apply when you visit Tikkurila websites. Please check up for more information:

<https://tikkurilagroup.com/tikkurila-privacy-policy>