



RECRUITMENT PRIVACY STATEMENT

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Media group KeskiSuomalainen is committed to protecting the privacy of job applicants in accordance with the data protection legislation in force at any given time.

In this privacy statement, we explain how we process your personal data as a job applicant or potential candidate. We describe what personal data we process and for what purposes, how long we store the data, to whom we may disclose your personal data and what rights you have as a data subject. We recommend that you read this privacy statement carefully.

1. Data controller and contact information

KeskiSuomalainen Oyj and individual companies belonging to the same group are joint controllers, i.e. they jointly determine the purposes and means of processing personal data. Joint controllers inform data subjects about the processing of personal data through this privacy statement. In order to exercise your rights, you can contact any company, but we recommend that you contact the company where you have applied for a job or that has otherwise initiated a recruitment process with you.

The companies acting as joint controllers are listed in Appendix 1.

Contact persons are:

HR Director Jarmo Koskinen

Development Manager Paula Varis

tel. 014 622 000

firstname.lastname (a) media.fi

The Group's Data Protection Officer is:

Matti Niskanen

tel. 014 622 000

tietosuoja (a) media.fi

2. Types of personal data we process

We generally process the following types of data relating to you:

- basic information, such as name, address, telephone number, email address, date of birth, gender;
- competencies, such as education, work history and specific skills;
- other information you have provided to us on your CV, during an interview or otherwise during the application process; and
- other information relevant to the recruitment process, such as aptitude test results.

In addition, data may be collected in the following cases:

- the recipient's email address in conjunction with a "Tell a friend" function; and
- the recipient's e-mail address and the search criteria used, if an automatic notification is subscribed to for job vacancies using the "Search Alert" function.

We receive personal data directly from you or from external sources, such as references named with your consent, during the recruitment process or when concluding an employment contract. When using the "Tell



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a friend" function, your email address will be obtained from the person who sent you a tip about an interesting job.

3. Purposes and grounds for processing

We process the personal data of potential applicants and job applicants for the following purposes for the following legal grounds:

- **Consent:** We process the job applicant's personal data based on your consent to carry out the recruitment process. Based on your consent, we may also collect information about you from third parties and other external sources, such as aptitude tests and other assessments to measure work-related cognitive capacity and suitability for the role. The recruitment website may use cookies to analyse the use of the service based on the user's consent. More information on the use of cookies is provided on the recruitment website.
- **Legitimate interest:** We may process age and gender data for statistical purposes aimed at developing recruitment. In addition, we may search for potential candidates through various channels, such as company websites, LinkedIn or through our recruitment partners. We have a legitimate interest in developing our recruitment process and reaching out to potential candidates to inform them about interesting job opportunities. We may also process job applicant's personal data to defend legal claims based on our legitimate interest. We have assessed that your fundamental rights or freedoms do not override the legitimate interest described above.
- **Contract:** At the final stage of the recruitment process, the job applicant's personal data is processed for the purpose of negotiating an employment contract.
- **Legal obligations:** We may process personal data, for example to investigate matters related to work permits, on the basis of our legal obligation.

We do not process personal data to make automated decisions that produce legal effects or otherwise significantly affect you.

4. Data retention

Personal data will be stored for the duration of the recruitment process in question and for two years after its completion. We may retain your personal data for a longer period if we have your consent to use your personal data in other recruitment processes or if there is otherwise a legitimate reason to do so, such as defending legal claims.

5. Disclosure and transfer of your personal data

We will not disclose your personal data to third parties except in the situations described below:

- **Public authorities:** We may disclose your personal data to public authorities when we are legally obliged to do so under applicable law.
- **Consent:** Based on your consent, we may disclose your personal data within the limits set by your consent.
- **Mergers and acquisitions:** We may disclose your personal data in connection with a corporate transaction to the other party or parties of the transaction if and to the extent necessary.

- **Group companies:** We may disclose your personal data to companies belonging to the same group for legitimate purposes.

We may transfer your personal data to third parties who provide services to us. These third parties, such as IT service providers, process personal data on our behalf and in accordance with our instructions. When we transfer your information to third-party service providers, we have ensured that these service providers are also committed to protecting your privacy in accordance with applicable law.

The technical platform used in recruitment is [the LAURA™ service](#), the supplier of which LAURA Recruitment Oy is responsible for the technical implementation of the register and thus acts as a processor of personal data. LAURA Recruitment Oy is a Finnish service based in Finland. Video interviews (including video questions placed on the application form) are conducted using [the RecRight service](#), which is provided by Mobile CV Oy. Data transfer between the services takes place over secure connections.

If we need to transfer your personal data outside the EU or EEA, we will only transfer your data using transfer mechanisms permitted by applicable law, such as the EU Commission's Standard Contractual Clauses.

6. Data security measures

We use appropriate technical and organizational security measures to protect your personal data against unlawful or unauthorized access, disclosure, loss and other unauthorized processing. These measures include, for example, the use of firewalls, encryption techniques and secure premises, appropriate access control, controlled granting of access rights and control of access to systems, and appropriate instruction of personnel involved in the processing of personal data.

7. Your rights as a data subject

In addition to receiving information in this privacy statement, you have the following rights as a data subject:

- **Right of access, rectification and erasure:** You have the right to request access to your personal data processed by us. At your request, we will correct any incorrect or incomplete personal data concerning you. You also have the right to request the erasure of your data (right to be forgotten) in accordance with applicable legislation.
- **Right to data portability:** You have the right to receive the personal data concerning you concerning us in a structured, commonly used and machine-readable format, and you have the right to transmit this data to yourself or to another controller when we process your data automatically on the basis of a contract or your consent.
- **Right to object and restriction of processing:** You have the right to object to processing by us based on legitimate interest, for reasons relating to your particular situation. You also have the right to request that the processing of your personal data be restricted, for example if you object to the processing described above or contest the accuracy of your personal data.
- **Right to withdraw consent:** You can withdraw your consent at any time. Please note that withdrawing your consent does not affect the lawfulness of the processing we carried out prior to the withdrawal. Withdrawing your consent may result in us no longer being able to consider your application in the recruitment process.



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- **Right to lodge a complaint:** You have the right to lodge a complaint with the relevant supervisory authority if you consider that we have processed your personal data in breach of this Privacy Policy or applicable law. The contact details of the Finnish supervisory authority can be found at: www.tietosuoja.fi.

If you wish to exercise the rights described above, please send your request to the contact person of the register (section 1). Please note that we will ask you to verify your identity when exercising your rights.

8. Changes to this Privacy Statement

We reserve the right to change this privacy statement due to changes in our employment practices or legislation. We recommend that you review the contents of the privacy statement regularly.

This privacy statement was last updated on 26 April 2024.



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ANNEX 1

Companies acting as joint controllers

KeskiSuomalainen Oyj and each individual company listed below:

Etelä-Suomen Media Oy
Keski-Suomen Media Oy
Savon Media Oy
Hämeen Media Oy
Esa Digital Oy
Mediasepät Oy
Kamua Oy
Lehtisevät Oy
Painotalo Plus Digital Oy
Tietoykkönen Oy
IROResearch Oy tutkimustoimisto
Omnipress Oy
Neonmedia Oy
Väli-Suomen Media Oy
Kaakon Viestintä Oy
PK Paikallismediat Oy
Sanomalehti Karjalainen Oy
Karelia Viestintä Oy