

## Nice-business Consulting Oy Applicant and Recruitment Privacy Policy

### 1 Description of the Register

This privacy policy describes the way in which the personal data of the potential applicants and job seekers is collected and processed in Nice-business Consulting for use in recruitment services.

### 2 Data Controller and Contact Information

Nice-business Consulting Oy (referred to below by the brand name "Nico")

PL 458, Valimotie 16

00101 Helsinki

E-mail: [recruitment@nico.fi](mailto:recruitment@nico.fi)

Detailed information regarding the processing activities described in this policy will be given by the following person:

Juha Hyvärinen

[juha.hyvarinen@fujitsu.com](mailto:juha.hyvarinen@fujitsu.com)

+358 293025812

### 3 Reasons for Collecting and Processing the Personal Data

- Establishing a database of potential applicants and job seekers with their CVs included
- Facilitating recruitment processes of Nico's client companies and bringing job seekers and employers together
- Recruiting employees by Nico itself
- Collecting information about the freelancers and employees of Nico's subcontractors in order to provide their contract work services (assignment) to Nico's customer companies
- In case of actual employment, providing the initial employee information to the HR registries and file systems

### 4 Legal Basis for the Processing of Personal Data

The legal basis for processing of the personal data is:

- 1) the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; and
- 2) consent of the data subject for the processing of their personal data.

As long as the data subject (job seeker or applicant) has provided their information and/or CV to the Nico's database for promotion of their skills and facilitation of their employment or assignment opportunities, the personal data is processed based on their consent which they may revoke at any time. When the personal data is taken into use in a specific recruitment process and/or disclosed to the potential employer for analysis and further actions, the basis for the processing changes into preparation for and ultimately the performance of an employment or service contract.

### 5 Content of the Personal Data

The following personal data of the data subjects (end users) is processed in the service:

- Name and contact details such as name, address, e-mail address, telephone number (for identification and communication)
- Information for assessing competence and suitability (e.g. work experience, educational background, language skills and other skills)

- Attachments (e.g. CV, cover letter, portfolio, photo)
- Data that is created during the recruitment process such as e-mail messages, SMS messages and stored files
- Classifications and notes taken by the employer

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

- Recipient's e-mail address, if a job posting is forwarded using the 'Tell to a friend' functionality
- Recipient's e-mail address and search criteria when subscribing to job agent for e-mail notifications of open jobs

## 6 Sources of the Personal Data

The personal data processed in the service is provided to Nico and the service by the data subjects themselves. As an exception, in the case of freelancers and employees of Nico's subcontractors, the personal data concerning such data subjects is disclosed to Nico by the subcontractors themselves.

## 7 Transfers and Disclosures of the Personal Data

The personal data is transferred to Nico's subcontractors for processing activities and reasons laid out in section 3 above. Nico enters into separate agreements with its subcontractors regarding the processing of the personal data and reviews that the subcontractors abide by these agreements.

The personal data are disclosed to Nico's client companies which are seeking employees or assignments. These client companies act as separate, independent Nicos in relation to their own application and HR processes and process the personal data disclosed to them by Nico in accordance with their own privacy policies. Nico may also have to disclose or present the personal data as a part of an audit or other review undertaken by authorities and targeting Nico.

The personal data is processed and stored in the EU or EEA.

## 8 Retention Period of the Personal Data

The personal data collected and stored under this Privacy Policy is retained for a period of five (5) years from the latest date on which a submission or modification of a job/assignment application (which the personal data is a part of) was made.

## 9 Data Security

Nico ensures that the personal data is stored and processed only in databases secured by passwords, encryptions and other contemporary data security techniques. The personal data is only accessed by such employees of Nico and its subcontractors that have a reason for accessing the data based on their role and duties. Nico's office spaces and server rooms have been protected against unauthorized access and different kinds of accidents and hazards. The contents of the file register have also been backed up.

## 10 Data Subject Rights and Using Them

Based on privacy legislation, the data subject has the following rights in relation to the processing of personal data described in this privacy policy:

- Right to access the personal data concerning themselves,
- Right to request the rectification or erasure of the personal data concerning themselves,
- Right to object to the processing of personal data and thus request its deletion,
- Right to file a complaint about the processing described herein with the authority having jurisdiction, in this case the Finnish Data Protection Ombudsman.

In order to use their legal rights, the data subject should contact the person mentioned in section 2. Nico may request additional information from the data subject themselves in order to process the request or ascertain the identity of the data subject making the request.