

# Job Applicant Privacy Statement

## 1. Controller and Contact Information

Companies belonging to Nokian Tyres group (“Nokian Tyres” or “we”) are committed to processing personal data transparently and in compliance with applicable data protection laws.

This Privacy Statement (“statement”) explains how job applicant’s (“applicant”) personal data is processed in connection with Nokian Tyres group companies’ recruitment. Protection of applicant’s privacy is important to us.

The company belonging to the Nokian Tyres group, that acts as the employer in relation to the open position, is the controller of the applicant’s personal data.

Company acting as employer	Data Controller
Levypyörä Oy	Levypyörä Oy
Nokian Tyres plc	Nokian Tyres plc
Nokian Däck AB	Nokian Däck AB
Nokian Dekk AS	Nokian Dekk AS
Nokian Tyres AG	Nokian Tyres AG
Nokian Tyres GmbH	Nokian Tyres GmbH
Nokian Heavy Tyres Oy	Nokian Heavy Tyres Oy
Nokian Tyres Sp. z o.o.	Nokian Tyres Sp. z o.o.
Nokian Tyres s.r.o.	Nokian Tyres s.r.o.
Nokian Tyres Spain S.L.U.	Nokian Tyres Spain S.L.U.
Nordic Wheels AB	Nordic Wheels AB
NT Tyre Machinery Oy	NT Tyre Machinery Oy
Vianor AB	Vianor AB
Vianor AS	Vianor AS
Vianor Holding Oy	Vianor Holding Oy
Vianor Oy	Vianor Oy

As a global company, Nokian Tyres plc and its subsidiaries have common centralised HR functions. As regards to the centralised HR functions, Nokian Tyres plc is the data controller jointly with the local company acting as an employer.

This privacy statement applies to all companies within Nokian Tyres group that act as data controllers as indicated above.

**Any questions regarding our applicants’ privacy can be directed to us:**

Nokian Renkaat Oyj  
Pirkkalaistie 7  
37101, Nokia, FINLAND  
[privacy@nokiantyres.com](mailto:privacy@nokiantyres.com)

## 2. Purpose and Legal Basis of Processing

Applicant's personal data is processed for the purpose of carrying out and managing our recruitment process and for the purposes of fulfilling the rights and obligations of labour law.

The processing of applicant's personal data is necessary in order to take steps at the request of the applicant prior to entering into an employment contract. In relation to our statutory obligations the legal basis of processing is our legal obligation.

## 3. Categories and Sources of Personal Data

We process only such personal data that is directly relevant for the recruitment process. We are processing following types of personal data in the context of recruitment:

- **Basic information** such as applicant's contact information.
- **Proficiency related information** such as information related to education, work history, video interviews and certificates.
- **Information provided by authorities or third parties** such as information regarding criminal record or credit score if required to comply with our mandatory legal obligations as an employer.

Primarily, personal data is collected directly from applicants. Depending on the nature of the applied role within Nokian Tyres Group, some personal data may also need to be collected from public or third-party sources to the extent permitted by applicable legislation. In cases where personal data is not collected directly from applicants' it is collected in order to establish applicant's reliability by acquiring their personal credit data or information regarding criminal record. In such a case, we will notify applicant in advance and ensure the right to verify the personal data.

## 4. Personal Data Transfers and Disclosures

### Personal Data Transfers

Nokian Tyres Group uses subcontractors and service providers for our legitimate business purposes. These subcontractors and service providers include recruitment software provider, partners supporting recruitment and conducting suitability assessments and HR-systems providers.

The processing of personal data in relation to our subcontractors and service providers is always commissioned by us and the parties will act only on our behalf as personal data processors. Such processing is always protected with contractual arrangements to ensure that our service providers and partners process applicants' personal data in accordance with the laws and good data processing practices.

Where our subcontractor or service providers is located outside the European Union (EU) or the European Economic Area (EEA) we ensure the adequate level of data protection with appropriate safeguards by using standard contractual model clauses approved by the European Commission. For example, some companies within the Nokian Tyres Group are located outside the European Union (EU) or European Economic Area (EEA).

Where our subcontractor or service provider is located in the United States, we guarantee that the service provider we use ensures adequate level of data protection contractually.

### **Personal Data Disclosures**

We shall disclose personal data only when it is strictly necessary for the purpose of our recruitment process and always in compliance with applicable laws.

Depending on the nature of the applied role, personal data might be disclosed to companies within Nokian Tyres Group. In the event of possible mergers or acquisitions we need to disclose our applicants' personal data to relevant stakeholders in compliance with applicable laws.

## **5. Security of Personal Data**

The security of personal data is important to us. We use technical and organisational measures to ensure the security of personal data from loss, misuse or other similar unlawful access. Such methods include the use of firewalls, encryption technologies and safe server premises. Access to personal data is limited on "need-to-know" basis and controlled by system access rights, as well as through granting and controlling access rights.

In the event of a personal data breach, we will notify local supervisory authorities and applicants whose personal data may have been endangered in accordance with applicable legislation.

## **6. Data Subject Rights**

As a responsible company we want to be open and transparent on the processing of applicant's personal data. This means we give our applicants the opportunity to control the processing of personal data.

**Right of Access.** Applicants have the right to receive a confirmation whether we are processing their personal data, what personal data we process about them and to receive a copy of their personal data.

**Right to Rectification.** In case personal data we process is inaccurate or incomplete, applicants have the right to request rectification or completion of their data.

**Right to Restrict Processing.** Applicants have the right to request restriction by contesting the accuracy of their personal data. In such a situation, the processing activities are restricted for the period of time taken to verify the accuracy of personal data.

**Right to be Forgotten.** Applicants have the right to request their personal data to be erased. In some cases, there may still be an overriding purpose for processing and retaining personal data e.g. in order to fulfil legal obligations of an employer.

**Right to Data Portability.** Applicants have the right to request their personal data in machine-readable format in situations where we process personal data based on contract. This only applies to personal data applicants have provided us with.

If applicants consider that the processing of personal data infringes their rights, applicants may contact the supervisory authority and lodge a complaint about our processing of personal data.

Any questions or requests regarding above mentioned rights can be sent via email to [privacy@nokiantyres.com](mailto:privacy@nokiantyres.com).

## **7. Retention Periods**

We will retain applicant's personal data for the duration of the recruitment process, and after that as required by applicable legislation or as long as the personal data is required to protect Nokian Tyres' interest against (potential) claims.

At the end of the retention period we will erase the personal data from our systems and paper files. However, instead of destroying personal data, we may also make it anonymous in a way that it cannot be associated with a natural person anymore (e.g. for statistical purposes).

Any questions regarding our retention periods of personal data can be sent via email to [privacy@nokiantyres.com](mailto:privacy@nokiantyres.com).

## **8. Revisions to This Privacy Statement**

We are continuously developing our services and this privacy statement is subject to changes. Changes may also be based on changes in legislation. We recommend visiting this privacy statement in regular basis in order to keep track of possible changes.