

PAREE GROUP OY

PRIVACY POLICY, RECRUITMENT REGISTER.

This privacy policy has been drafted on: 8.3.2021

This privacy policy has been updated the latest on: 18.9.2026

1 CONTROLLER; CONTACT INFORMATION

1.1 The personal data controller is:

Paree Group Oy, Business ID 2442954-9("Paree Group" or "us"). Address: Keskustie 23, 61850 Kauhajoki as, Finland

2 OUR PRIVACY POLICY

2.1 Data protection is very important to Paree Group. We are committed to protecting our customers' personal data and such data which we administer on behalf of our customers. We are equally committed to protecting such persons' personal data who participate in our recruitment processes and are our potential future employees.

2.2 This privacy policy ("policy") describes the data protection and information security of personal data in connection with our recruitment processes. If you have any questions in relation to this policy, please contact our contact person (email:suvi.alatalo@paree.com).

3 APPLICABILITY OF THIS PRIVACY POLICY

3.1 This policy applies to persons (employee, officer, director) who participate in our labor recruitment processes ("you" or "person").

4 CONTACT PERSON

4.1 Contact person: Suvi Alatalo.

4.2 Email: suvi.alatalo@paree.com

5 PURPOSE OF POLICY

5.1 This policy describes how Paree Group processes personal data.

5.2 In this policy the term "person" refers to you, meaning all human beings whose personal data is processed.

6 PERSONAL DATA

6.1 “Personal Data” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

6.2 All of the data described in Section 6.3 below do not necessarily constitute Personal Data. If the data only identifies a company, such as an affiliate of Paree Group, the data is not Personal Data.

6.3 The following Personal Data is processed:

- (a) person’s name and other identification information;
- (b) information on the person’s role in their organisation or previous organisation;
- (c) person’s address, phone number, email address;
- (d) possibly other contact information of the person;
- (e) person’s country of residence;
- (f) person’s language skills;
- (g) person’s employer organisation’s contact information;
- (h) person’s education and work experience information;
- (i) person’s identification number and date of birth;
- (j) information on right to work (for instance to check if you have the right to work in the country);
- (k) security clearance information only when the law allows conducting of security clearance;
- (l) other information which we must process in order to comply with our obligations as employer or recruiter pursuant to applicable laws;
- (m) information collected by cookies and similar technologies including possible Personal Data
- (n) applicant ID, IP address, email address, time and date of loggings into the electronic recruitment system of Paree Group and of submitting the application and failed logging attempts.

7 DATA PROTECTION PRINCIPLES

7.1 We follow the following principles in all processing of Personal Data:

- (a) Personal Data is processed lawfully and properly.

- (b) Personal Data is processed only for explicit, unambiguous and lawful purposes, as presented in our documents (for example this policy).
- (c) Personal Data is processed and disclosed only if the processing or disclosure is compatible with these purposes.
- (d) Personal Data processed is adequate and relevant for the purpose and is not processed more than what is necessary for fulfilling the purpose.
- (e) Personal Data will not be processed longer than what is necessary for the purposes for which they were obtained.
- (f) Personal Data will be kept correct and up to date.
- (g) We perform our obligations pursuant to EU's General Data Protection Regulation ("GDPR").
- (h) Personal Data will be stored in information secure manner following GDPR's obligations on technical and organizational measures.

7.2 As we value the importance of data protection, we apply this policy to all persons participating in the recruitment process. We comply with existing law and thus ensure our compliance. We are committed to ensuring the information security of all Personal Data processed.

8 GENERAL ON OUR ACTIVITIES

8.1 When and why may data be processed?

8.1.1 We process your Personal Data so that we may comply with law and perform our necessary duties, such as managing the recruitment process and securing the rights of a person participating in the recruitment process. Our contact person, supervises that our internal instructions and existing laws are complied with.

8.2 Who has access to your Personal Data?

8.2.1 Your Personal Data is processed by our HR personnel and applicable supervisors. However, in all cases the processing of your data is limited to such persons only in whose duties such processing is necessary and indicated in the instructions. Personal Data is processed with information secure technical and organisational measures which are regularly reviewed.

8.2.2 We provide your Personal Data to such authorities as required by existing law (e.g. register authorities, tax authorities, pension institutions and insurance companies). DPO is involved in all cases in order to ensure that the principles of privacy are met, and the person's identity who makes the request for access is always checked and the authority's jurisdiction in the matter in question is always verified.

8.3 When may special categories of Personal Data be processed?

8.3.1 Any data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning person's sex life or sexual orientation, data concerning health and data on criminal convictions and offences are classified as special categories of Personal Data (Article 9 and 10 of the GDPR).

(a) Legal obligations: We may have to process special categories of Personal Data to comply with legal obligations. For instance, in order to prove equal treatment, we may be asked to disclose limited data related to gender, age or ethnical background. In these cases when required by law the data will be anonymized and the processing is related strictly to statistical purposes. We also take care of minimizing the number of special categories of Personal Data and store and process such Personal Data in accordance with our data protection principles.

(b) Conducting Security Clearance: In situations permitted by law we may conduct a security clearance of you. This is only due to our customers' requirements.

8.4 How do you get access to your Personal Data which we process?

8.4.1 If you wish to use your right under the GDPR, please be in contact by email to: suvi.alatalo@paree.com

9 PURPOSES OF PROCESSING PERSONAL DATA AND LEGAL BASIS FOR PROCESSING

9.1 Personal Data is used for the following purposes:

(a) advertising Paree Group as an employer and soliciting employees (employee, officer, director) to Paree Group and managing the recruitment processes as a whole.

(b) obtaining and analyzing information of the person as an employee (previous employers).

(c) identifying persons in order to negotiate and enter into an agreement (employment agreement and other related agreements).

(d) Implementing information security and data protection for the purposes stipulated by law.

9.2 The legal basis for processing of Personal Data is the following:

(a) In Sections 9.1 b and c the basis for processing is a consent given by the person for the processing, as the person itself wishes to participate in the recruitment process of Paree Group. In situations where the processing is based on consent, the person has the right to withdraw the consent. The withdrawal of the consent does not affect the lawfulness of the processing based on the consent before its withdrawal.

(b) Otherwise, the basis for processing is that the processing is necessary for the purposes of the legitimate interests pursued by Paree Group. Legitimate interests mean that Paree Group may actively obtain information from the person on whether the person wishes to participate in the recruitment process of Paree Group. Paree Group may also give to a third party (recruitment company) an assignment regarding such goal.

(c) In Sections 9.1 b and c and d the basis for processing are also legal obligations concerning for instance equal treatment of persons.

10 DESCRIPTION OF CATEGORIES OF DATA SUBJECTS

(a) potential employees of Paree Group.

11 REGULAR SOURCES OF PERSONAL DATA

(a) the person itself;

(b) the person's organisation that is for instance current employer;

(c) the person's previous organisation that is for instance previous employer;

(d) Personal Data possibly collected by cookies and similar technologies of Paree Group and third parties used by Paree Group;

(e) Personal Data possibly collected by the websites of Paree Group.

12 REGULAR TRANSFERS AND DISCLOSURES OF DATA

12.1 Personal Data may be transferred to the following parties for the following purposes:

(a) ICT subcontractors or other subcontractors who process the Personal Data only based on an agreement made with Paree Group and in order to produce services for Paree Group.

(b) To authorities based on law.

12.2 [In addition, Paree Group has in use the following third-party services, to whose providers Paree Group discloses Personal Data collected with the help of cookies and similar technologies, or who otherwise process Personal Data based on an assignment from Paree Group when you use a service offered by them:

(a) Google Analytics: analytics and advertising

<https://policies.google.com/technologies/partner-sites>

(b) Instagram: advertising and analytics

https://help.instagram.com/519522125107875?helpref=page_content

(i) LinkedIn: advertising and analytics

<https://www.linkedin.com/legal/privacy-policy>

(j) Twitter: advertising and analytics

<https://twitter.com/en/privacy>

(k) Facebook: advertising and analytics

<https://www.facebook.com/policy>

12.3 The above-stated service providers process Personal Data for the purposes stated in Section 9.1 and for the purposes of Paree Group and the purposes described in their referred terms. Paree Group may, as needed, change a service provider it uses, in which case Paree Group also updates this privacy policy.

12.4 You will find more information on the cookies and similar technologies used by Paree Group by familiarizing yourself with our cookie policy.]

13 USE OF ARTIFICIAL INTELLIGENCE

13.1 Artificial intelligence (AI) may be used to analyze applicants' competencies, create candidate profile summaries, anonymize data, and support communication with applicants. All information processed through AI is used solely by Paree Group, and applicants' personal data is not used to train AI models.

AI does not make decisions regarding applicants. All recruitment-related decisions are and will continue to be made by human professionals.

14 TRANSFERS OF PERSONAL DATA OUTSIDE THE EU AND EEA

14.1 [Paree Group or the service providers it uses may transfer Personal Data outside of the European Economic Area (EEA) and European Union (EU). In these situations, the applicable legislation (such as GDPR) and the requirements set therein are complied with. The basis of the transfer is EU Commission's standard contractual clauses.]

15 AUTOMATED DECISION-MAKING

15.1 Paree Group does not process Personal Data in automated decision-making meant by the GDPR.

16 TIME PERIOD FOR STORING PERSONAL DATA

16.1 Personal Data is stored for 7 months after Paree Group has made the recruitment decision in question. After this, the Personal Data will be destroyed.

16.2 For the avoidance of doubt it is stated that a recruited person's Personal Data will be processed during their employment relationship pursuant to a policy and other documents applicable to the personnel of Paree Group.

17 SECURITY METHODS

17.1 In order to protect Personal Data, Paree Group has implemented appropriate technical and organizational measures to ensure that only authorized persons have access to Personal Data. Paree Group uses its own register tools or the register tools offered by cooperation partners. The register tools utilize technical security systems, such as firewalls, encryption technologies, passwords and antivirus software, in order to prevent the unauthorized use of Personal Data.

18 RIGHT OF ACCESS

18.1 A person has the right to obtain confirmation from Paree Group as to whether or not Personal Data concerning him or her is being processed by Paree Group. If the Person's Personal Data is being processed by Paree Group, Paree Group provides, upon request, to the person a copy of the Personal Data undergoing processing as well as the information required to be notified pursuant to the GDPR. For any further copies requested by the person, Paree Group may charge a reasonable lawful fee. If a request is manifestly unfounded or excessive, (in particular because of its repetitive character), Paree Group may refuse to act on the request.

19 RIGHT TO REQUEST RECTIFICATION

19.1 A person is entitled to require that Paree Group rectifies without undue delay inaccurate and incorrect Personal Data regarding the person that is processed by Paree Group. Taking into account the purposes for which the data was processed, the person has a right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

20 RIGHT TO REQUEST ERASURE

20.1 Paree Group will erase, upon a person's request, the Personal Data regarding him or her that is processed by Paree Group, if any of the following conditions is fulfilled:

- (a) the Personal Data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the person withdraws the consent on which the processing was based, and where there is no other legal ground for the processing;
- (c) the person objects to the processing pursuant to Section 21 and there are no overriding legitimate grounds for the processing;
- (d) the Personal Data has been unlawfully processed;

(e) the Personal Data has to be erased for compliance with a legal obligation in law to which Paree Group is subject.

20.2 Paree Group does not however have an obligation to erase the Personal Data if the processing of the Personal Data is necessary pursuant to applicable legislation.

21 RIGHT TO REQUEST RESTRICTION OF PROCESSING

21.1 “Restriction of processing” means the marking of Personal Data with the aim of limiting their use in the future.

21.2 Paree Group limits its processing of Personal Data upon the person’s request in the following situations:

- (a) the person contests the accuracy of the Personal Data, for a period enabling Paree Group to verify the accuracy of the Personal Data;
- (b) the processing is unlawful and the person opposes the erasure of the Personal Data and requests the restriction of their use instead;
- (c) Paree Group no longer needs the Personal Data for the purposes of the processing, but the Personal Data is required by the person for the establishment, exercise or defense of legal claims;
- (d) the person has objected to processing pursuant to Section 21, but verification whether the legitimate grounds of Paree Group override those of the person is still ongoing.

22 RIGHT TO OBJECT

22.1 A person shall have the right to object, on grounds relating to his or her particular situation, to processing of Personal Data concerning him or her in case the processing is based on any of the following: (i) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Paree Group, or ii) the processing is based on legitimate interests. In such a case, Paree Group is not allowed to process the Personal Data, except for the purposes allowed by the applicable mandatory legislation.

23 RIGHT TO DATA PORTABILITY

23.1 At the person’s request, if Paree Group processes the Personal Data based on the person’s consent or based on a contract with the person and if the processing is carried out by automated means:

- (a) Paree Group will provide the person with his/her Personal Data which he or she has provided to Paree Group that is processed by Paree Group, in a structured, commonly used and machine-readable format; and

(b) if technically feasible, Paree Group will transmit such Personal Data directly to another controller.

24 RIGHT TO LODGE COMPLAINT WITH SUPERVISORY AUTHORITY

24.1 If a person considers that Paree Group processes Personal Data in violation of data protection legislation, the person may lodge a complaint with the Office of the Data Protection Ombudsman acting as supervisory authority. The contact information of the Office of the Data Protection Ombudsman is:

Office of the Data Protection Ombudsman

Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland

Postal address: P.O. Box 800, 00531 Helsinki, Finland

Email: tietosuoja@om.fi

Switchboard: +358 (0)29 566 6700

Registry: +358 (0)29 566 6768

<https://tietosuoja.fi/en/home>