

Privacy Notice for Job Applicants
Nanoform Finland Oyj

#12807429v7

1. Introduction

As part of our recruitment process, the Company collects and processes personal information, or personal data, relating to job applicants. Nanoform Finland Oyj (“**Nanoform**”) is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations. This Privacy Notice for Job Applicants (“**Notice**”) is provided by Nanoform to describe the processing of personal data relating to job applicants (“**Applicant Data**”) in connection with the recruitment process at Nanoform.

The processing of Applicant Data is governed by the provisions of the General Data Protection Regulation ((EU) 2016/679) and the Finnish Data Protection Act (1050/2018), both of which apply generally to all processing of personal data. In addition, the processing of Applicant Data is governed by the provisions of the Finnish Act on the Protection of Privacy in Working Life (759/2004), in addition to which applicable provisions are set out in the Finnish Act on Electronic Communications (917/2014).

2. Controller

Name: Nanoform Finland Oyj
Address: Viikinkaari 4, 00790 Helsinki

3. Point of contact

Name: HR Manager
Address: Viikinkaari 4, 00790 Helsinki
Email: hr@nanoform.com

4. The purpose for the processing of Applicant Data

The personal data is processed for the following purposes:

- Identifying candidates for positions/roles (current and future) by searching for candidates or obtaining job applications
- Evaluating and selecting candidates for positions
- Fulfilling Nanoform’s statutory responsibilities and liabilities
- Communications with the applicant as well as third parties, such as partners and service providers of Nanoform

5. The legal grounds for the processing of Applicant Data

In processing of Applicant Data, Nanoform relies on the following legal bases:

- Compliance with legal obligations, in particular in the areas of employment legislation, social security legislation, data protection legislation, tax legislation, corporate compliance laws and laws related to pharmaceutical manufacturing
- Consent, as permitted by applicable law
- Legitimate interest of Nanoform or third parties (such as existing or potential business partners, suppliers, or customers). Examples of legitimate interest are
 - Prevention of fraud or misuse of Nanoform data systems or other resources and internal investigations related to any suspected misuse
 - Protection of Nanoform's property and supervision of the proper operation of production processes, as well as for preventing and investigating situations that endanger Nanoform's property or the production processes

6. The content of the register

Data provided by applicant, such as:

- Basic information such as name, date and place of birth, personal identification number, gender, photograph
- Contact information such as address, phone number, email address
- Information relating to the recruitment process such as CV and application information (work history), applicant's skills and evaluations

In addition, Nanoform may process also other relevant personal data if given voluntarily by the applicant.

7. Regular sources of Applicant Data

As a rule, Applicant Data is collected from the applicant and collecting Applicant Data from elsewhere generally requires the applicant's consent. Other data sources are used in accordance with legal requirements and restrictions.

8. Disclosures of Applicant Data

Applicant Data may in some cases be disclosed to service providers of Nanoform on a need-to-know-basis (such as recruitment services providers and other parties supporting in the recruitment process).

9. Transfer of Applicant Data outside the EU or the EEA

To the extent necessary, personal data may be transferred to countries outside the EU or the European Economic Area (EEA). In such cases, Nanoform will ensure the adequate level of data protection. Information on transfers of personal data outside the EU or EEA area and on the appropriate safeguards applied thereto from time to time is available from the contact person mentioned in section [3](#) above.

10. Access to Applicant Data

Nanoform protects Applicant Data by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. We use appropriate technical and organizational means to secure the personal data from inappropriate access, accidental or unlawful destruction, amendment, distribution, and transfer of personal data as well as from other unlawful processing.

11. Retention time of Applicant Data

Applicant Data is retained by Nanoform only for the time necessary to achieve the purposes for which the data was collected, in accordance with applicable legislation. When Nanoform no longer needs the Applicant Data for such purposes, the data will be removed from the data systems and records of Nanoform. The aforementioned does not, however, apply to personal data subject to statutory retention periods.

In general, personal data processed in employment context are subject to various statutory retention obligations that Nanoform as the employer must comply with. In case the applicant is selected to the position, these kinds of obligations may require that personal data is retained for up to ten years after the basis for processing has ended. An example of such statutory obligation is Chapter 6 Section 7 of the Finnish Employment Contracts Act (55/2001), under which the applicant is entitled to receive a certificate of employment within ten years of termination of the employment relationship, which is why Nanoform retains the applicants' basic information and information relating to the employment for ten years from the termination of the employment.

In case the applicant is not selected to the position, the general retention period is one year, unless other lawful bases for further processing of the applicant's data arise.

12. The rights of the data subject

The applicable data protection legislation ensures the data subjects the following rights:

- **Right of access:** The applicant has the right to obtain a confirmation from Nanoform on whether Nanoform processes personal data concerning the applicant and the right to access such data.
- **Right to rectification:** The applicant has the right to obtain from Nanoform the rectification of inaccurate personal data concerning the applicant, or to have incomplete personal data processed by Nanoform to be completed.
- **Right to be forgotten:** The applicant has the right to requests from Nanoform the erasure of personal data related to the applicant and Nanoform has the obligation to erase such data in case there is no longer a legal ground for the processing of such data. Please note that due to the several statutory retention requirements related to the Applicant Data, Nanoform may not be able to comply with the request.
- **Restriction of processing:** In certain cases, where so prescribed by law, the applicant may have the right to obtain from Nanoform restriction of processing of his/her personal data.
- **Right to data portability:** The applicant may, subject to certain conditions prescribed by law, have the right to receive the personal data concerning him/her processed by Nanoform in a commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance from Nanoform.
- **Right to object to processing of personal data:** In certain cases, the applicant may have the right to object to processing of personal data concerning him or her.
- **Right to withdraw consent:** To the extent the processing of personal data has been based on the data subject's unambiguous consent, the data subject has, at any time, the right to withdraw his/her consent regarding the processing.

If you want to utilize your rights stated above, please contact us with the contact information specified above.

In addition to the rights described above you are entitled to make a complaint to the data protection authority, especially in the European Union country where you have your domicile or permanent workplace or where the claimed breach of data protection regulation occurred. In Finland, this authority is the data protection ombudsman. Further information can be found on the ombudsman's website: <https://tietosuoja.fi/en/home>.

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13. Amendments to this Notice

Nanoform may, from time to time amend this data protection Notice. You can tell when changes have been made to this Notice by referring to the "Last Updated" legend in the beginning of this document. Nanoform encourages you to review this document regularly for any changes.