Privacy Policy for Candidates

This privacy policy describes how Optinova Group and its wholly owned subsidiaries ("Employer", "we", "us") collects and process personal data about job applicants ("Candidates", "you") through the service Jobylon ("Jobylon") provided by Jobylon AB, including your rights regarding your personal data and how to enforce them.

If you apply for a job, get recommended for a position, get in touch with the Employer or the Employer otherwise processes your data through Jobylon, the Employer is the data controller as defined in the GDPR. Jobylon AB will only process your personal data as a data processor, meaning that it is the Employer and not Jobylon AB who determines how and why your data is processed. This privacy policy may be updated periodically. You will be informed of any significant changes (e.g. by email or at our website), but we also recommend that you review this privacy policy from time to time to ensure you are aware of any amendments.

Please do not hesitate to reach out to the Employer if you have any questions or comments regarding your personal data or this privacy policy:

Via email, at privacy@optinova.com

PERSONAL DATA THAT EMPLOYER PROCESS

We process the following categories of personal data about you:

- Contact details. Your name, email address, telephone number and postal code.

- CV and other information included in the application. We will process your CV, cover letter, work samples, references, letters of recommendation and other information you provide us with in your application.

- Data from interviews, assessments and other reference information. This means notes from interviews with you, assessments or tests made, expectations and salary requirements.

- Communications data. We will collect and store your communication with us and any information provided to us in such communication.

- Special categories of personal data ("sensitive data"). If sensitive data is included by you in your communication with us or in your resume, we will process such information only to the extent necessary and justified in accordance with the consent you have provided us.

HOW WE GATHER YOUR PERSONAL DATA

Information you give to us. Most of the information we process about you is received from you. You may directly or indirectly give us information about yourself in different ways, for example when you contact us or through your application. You can always choose not to provide us with certain information. However, some personal data is necessary in order for us to process your application.

Information we collect about you. We may also obtain your personal data from your current employer or the website of your employer and/or through third parties such as LinkedIn and/or a recruitment service provider, commonly known as "sourced recruiting". Furthermore, our employees can give us a recommendation about a potential candidate. If this is applicable in your case, this privacy policy also applies to you.

HOW YOUR PERSONAL DATA WILL BE USED AND THE LEGAL GROUNDS FOR IT

We process your personal data for the following purposes and based on the following legal basis:

- **To administer incoming applications.** Your personal data will be processed in order for us to administer and manage incoming applications. This processing is based on a balancing of interests, where our legitimate interest is being able to have a structured application- and selection process.
- **For the recruitment and selection process.** We will process your personal data during the recruitment process, including sourced recruitment, for the purpose of finding and determining whether you are a good fit for us, based on our legitimate interest in being able to recruit personnel with the relevant competence for us.
- **To communicate with you.** Your contact details will be used to communicate with you. This processing is necessary for our legitimate interest in effective communication with you in connection with your application and/or the recruitment process.
- **To protect our legitimate business interests and legal rights.** We will save and store information if we believe it is necessary to protect and enforce our legal rights, interests and the interests of others, for example in connection with legal claims, discrimination claims, compliance, regulatory and audit functions. This processing is based on a balancing of interests, where one legitimate interest of ours is defending and enforcing legal claims.
- **To be able to consider you and your application and contact you for future job openings.** In our legitimate interest, and what we believe is yours as well, in being able to consider you and your application and to contact you with regard to other future job openings we keep your data for that purpose.

- **To be able to consider you and your application and contact you for future job openings.** If you have given us our consent, we will keep your personal data after the recruitment process has ended in order for us to consider you and your application and to contact you with regard to other future job openings.
- **Marketing of us as an employer.** Based on our legitimate interest in being able to market us as a potential employer to relevant candidates your contact information will be used to send you newsletters regarding for example how it is to work for us or to send you event invitations. If you do not wish to receive this kind of marketing, please use the instructions we have provided in the email you have received from us or contact us directly.
- **To administer events that you are attending.** If you attend one of our events, we will process the personal data necessary to be able to administer that event. Generally, the categories of personal data involved are your contact details, the company you currently work for and if we serve food – food preferences. This processing we base on our legitimate interest in being able to process the information needed to plan, provide and administer the event. In case you provide us with information of your allergies, we process this information based on your consent.
- **Sharing relevant data with parties involved in a merger or acquisition.** In connection with, due to strategical or business-oriented reasons, a potential merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company, the personal data we retain about you may be processed, shared or transferred, to parties involved in the process. This processing is based on our legitimate interest of being able to develop our business.
- **With your consent.** Your personal data may be used for other purposes than stated above if you ask us to or you give us your consent. Any sensitive data you have provided to us will be processed based on your consent.

HOW WE SHARE YOUR PERSONAL DATA

Sometimes, we need to share your personal information with other trusted individuals and companies. Your personal information is shared with:

- **Our consultants.** Your personal data will, when appropriate, be shared with our trusted consultants. However, we will restrict access to those consultants who need it to perform their jobs, for example to provide recruiting services to us. Our consultants are of course subject to strict confidentiality.
- **Our service providers.** We transfer to or share your personal data with our service providers who help us in our daily operations which require the processing of personal data, such as Jobylon, a recruitment service provider or

suppliers of different types of digital solutions. For the sub-processors of Jobylon, please click here.

- **Authorities and other public actors.** Sometimes legal obligations may require us to share information about you, for example to respond to lawful requests from law enforcement agencies, regulatory agencies, and other public and government authorities. We may also disclose information if needed to detect and prevent fraud.
- **Parties involved in legal proceedings.** In connection with a potential legal proceeding, including in the preparatory work for us to be able to defend us against or enforce any legal claims, your personal data may have to be shared with parties involved in the proceedings, such as lawyers.
- **Parties involved in a merger or acquisition.** We may share or transfer your personal data in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Other parties,** if you request us to or permits us to.

WHERE WE PROCESS YOUR PERSONAL DATA

Your personal information may in some cases be transferred to and stored at destinations outside the EU/ EEA where the privacy laws may not be the same as, and in some cases may be less protective than, privacy laws in the EU/EEA. We will however take all the necessary steps to ensure that adequate safeguards (such as EU standard contractual clauses including supplementary safety measures or an adequacy decision by the EU Commission) are in place to protect your personal information and to make sure it is treated securely and in accordance with the GDPR. Please contact us for more information about the safeguards in a specific case. For the sub-processors of Jobylon, please click here. You can contact us for more information about any applicable countries and safeguards in specific cases.

HOW LONG WE KEEP YOUR PERSONAL DATA

We keep your personal data only as long as necessary to fulfil the purposes for which it was collected. How long depends on the type of information and why we process it. We regularly review our need to keep data, taking into account applicable legislation. If you apply for a job, we generally keep the collected data during the recruitment process and 24 months after you have applied. If you become an employee we will keep your personal data during your employment (for other purposes than those stated above, which you will be informed of). If we have found you through a recommendation, we keep your personal data for up to 24 months from the day your data is submitted or if we have found you through sourced recruiting, up to 24 months from the day your data was uploaded. If you do not succeed in the recruitment process, we may keep your

personal data for future job openings for up to 24 months from the day your application was submitted.

We also keep the necessary personal data to ensure we can address any potential concerns or claims you might have. For example, we store the relevant data for discrimination claims for up to 24 months from the day your application was submitted. Personal data processed on the basis of your consent will be deleted when your consent is withdrawn or upon expiry of the purpose for which your consent was given. Your data may also be stored for a longer period if required by applicable statutory retention periods.

YOUR RIGHTS

- **Right to access your data.** You have the right to request a transcript of personal data processed by us, and additional information on how the data have been collected, processed, shared, etc. The first transcript may be requested free of charge, however if you make repeated and unreasonable requests for copies we might charge you with an administrative fee.
- **Right to object.** You have right to object to processing based on legitimate interest. This means that we may no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests. You can always contact us for more information on the balance test that has been made. You furthermore have an unconditional right to object to your personal data being processed for direct marketing purposes.
- **Right to transfer your data.** You have the right to transfer the personal data you have provided to us to another controller under certain conditions.
- **Right to rectification.** You have the right to correct inaccurate or incomplete information about yourself.
- **Right to erasure ("right to be forgotten").** You have the right to request that we delete personal data about you, for example if the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or if there is no legal basis for processing the data.
- **Right to restriction.** You are entitled to request that the processing of your personal data should be limited until inaccurate or incomplete information about you has been corrected, or until an objection from you have been handled.
- **Right to withdraw your consent.** You may at any time withdraw any consent you have given us. However, please note that it will not affect any processing that has already taken place.
- **Right to complain.** You have the right to lodge a complaint to our lead supervisory authority or the supervisory authority in the country you live or work in, if you believe that we have not complied with our obligations regarding your personal data. Please note that if you request restriction or erasure it might

affect our ability to process your application or consider you for a job. Moreover, legal rights or obligations may prevent us from disclosing or transfer all or part of your information, or from immediately deleting your information.

Contact information

If you have any questions or complaints regarding our processing of your personal data, or to exercise your rights, please contact us at privacy@optinova.com

Optinova Holding Ab
+358 18 32 900
info@optinova.com

Torggatan 6, floor 3, 22100 Mariehamn, Åland, Finland

If you consider our processing of your personal data to be non-compliant with applicable data protection laws, you can always lodge a complaint to **the Finnish Data Protection Officer**, www.tietosuoja.fi or **The Swedish Authority for Privacy Protection (IMY)** Integritetsskyddsmyndigheten | IMY