

DRAFT 19.5.18 Legal review 15.5.2018

Recruitment Privacy Statement

HELLO.

WE WANT TO MAKE SURE YOU ARE *ON BOARD WITH US WHEN IT COMES TO THE USE OF YOUR DATA.*

This Recruitment Privacy Statement (“Privacy Statement”) has been put together to inform you of how we collect and process your personal data in connection with recruitment. This Statement caters to the informational duties set for data controllers in article 13 of the EU General Data Protection Regulation (“GDPR”) and lays out the practices and purposes of personal data processing at Finnair.

The Statement covers all the personal information we may collect when you are applying for a job at Finnair Plc or one of its subsidiaries: Finnair Cargo Ltd, Finnair Flight Academy Ltd, Finnair Kitchen Ltd, Finnair Technical Services Ltd, Finnair Travel Retail Ltd or Suntours Ltd.

Each employer company acts as the data controller in regard to its own job applicants. However, the processing of any requests related to personal data has been centralised under the care of Finnair Plc for the most part.

Each employer acts as a data controller in regard to their own recruitment data. However, the management of any requests has been centralised under the care of Finnair PLC.

We may update this Privacy Policy from time to time.

CONTACT DETAILS OF FINNAIR

CONTROLLER

FINNAIR PLC

Business ID 0108023-3

Address Tietotie 9, 01530 Vantaa, Finland

Finnair Cargo Ltd (0108057-5)
Tietotie 9, 01530 Vantaa, Finland

Finnair Flight Academy Ltd (2291914-9)
Pyhtäänkorventie 11–13, 01530 Vantaa, Finland

Finnair Kitchen Ltd (24235226)
Tietotie 8, 01530 Vantaa, Finland

Finnair Technical Services Ltd (2286606-7)
Turbiinikuja 6, 01530 Vantaa, Finland

Finnair Travel Retail Ltd (1633153-3)
Tietotie 9, 01530 Vantaa, Finland

Suntours Ltd (Suntours Ltd Ab)
Tietotie 9, 01530 Vantaa, Finland

DATA PROTECTION OFFICER

Contact Finnair Group Data Protection Officer at: PRIVACY@FINNAIR.COM.

What personal data do we collect and process?

IDENTIFICATION AND CONTACT DATA

Depending on the open position we may collect your basic identity information, such as your full name, gender, date of birth, social security number or nationality. We also collect your contact information, such as your address, phone number and email address.

YOUR SKILLS, QUALIFICATIONS AND PROFESSIONAL PROFILE

We process information about your skills, qualifications and proficiencies, for example your language skills, education or licences. In connection with this, we may process documents you provide us with, such as your curriculum vitae or your work or degree certificates.

We also process information about your professional background, including information about your previous positions and work experience.

With your consent, we may contact a referee you have provided us with, such as your contact at a former employer.

YOUR QUALIFICATIONS AND PROFESSIONAL PROFILE

We process information about your skills, qualifications and proficiencies, for example your language skills, education, work licences or business licences. In connection with this, we may process documents you provide us with, such as your curriculum vitae or your work or degree certificates.

We also process information related to your professional profile. These include, for example, information on your professional interests and goals.

With your consent, we may contact a referee you have provided us with, such as your contact at a former employer.

COLLECTION OF SENSITIVE DATA

In principle, the recruiting employer does not handle sensitive personal information during the recruitment process, such as information on your health or sexual orientation.

However, during the recruitment process we may ask for an assessment by a health care professional of your suitability for the post. In this case, the health care professional (from either Finnair Health Services or an outside provider) will give the recruiting employer an assessment on whether or not the candidate is suited for the job.

Why do we collect your personal data and for how long do we store it?

HOW DO WE USE YOUR DATA

Based on pre-contractual actions/ Sopimusta edeltävien toimenpiteiden toteuttamiseksi

We process the personal data you have provided us with for recruitment purposes in order to assess and evaluate the possibility of entering into an employment contract with you.

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Based on our legal obligations/Lakisääteisiin velvollisuuksiimme perustuen

If the position you are applying for legally requires us to check or confirm your formal qualification or suitability for that position, we may process your personal data to fulfil this legal obligation. These obligations may be included in the demands set by the legislation governing aviation.

If the position you are applying for legally requires us to check or confirm your formal qualification or suitability for that position, we may process your personal data to fulfil this legal obligation. These types of legal obligations may be based on, for example, aviation law requirements.

Based on your consent/Suostumuksesi perusteella

With your consent, we may in certain cases also acquire some information from sources other than directly from you. For example, we may carry out personnel assessment testing or contact a referee you have provided us with.

With your consent, we may in certain cases also acquire some information from sources other than directly from you. For example, different testing, for instance in connection with recruitment, is done based on consent. Similarly, we will only be contacting possible referees after getting consent from you.

Oikeutetun etumme perusteella/Based on our legitimate interest

We store your personal data for a certain period after the recruitment has ended in case of any recruitment-related claims or litigation.

We store your personal data on the basis of our legitimate interests for a certain period after the recruitment has ended in case of any claims or litigation related to the recruitment process.

STORAGE PERIOD

We keep your personal data for as long as necessary for us to fulfil the purpose for which it was collected, unless we have lawful grounds to store it for a longer period of time.

The criteria we use to determine our data storage periods are the following:

- The period of time we have an ongoing recruitment process with you.
- Whether the processing is necessary for the purposes of, for example, litigation and regulatory investigations.

Where do we get your data from and with whom do we share it?

SOURCES OF DATA

We primarily get your data directly from you.

Under certain conditions and as permitted by law, we may also acquire information from your referees, by conducting testing or from authorities or public registers.

We primarily get your personal data directly from you.

Under certain circumstances we may also obtain information from other sources such as referees, aptitude testing, authorities or public registers.

SHARING YOUR DATA

The data is processed by a limited number of people within the Finnair Group, such as its human resources recruiting personnel and recruiting managers. Data may also be disclosed to external service or system providers who provide services for Finnair.

In certain cases, we may share your personal data with third parties if we feel it is necessary for legal reasons.

The data is processed by a limited number of people within the Finnair Group, such as its human resources, recruiting personnel and recruiting managers.

Some of the tasks or systems for processing personal data have been outsourced, which means that our partners or service providers process your personal data.

In certain situations we may also hand over your personal data to third parties for legal reasons.

Your data, your rights

RIGHT TO ACCESS

You have the right to access your personal data processed by us. You can access your applications in our Saima recruitment system through your account. You may also contact us [here](#) and we will inform you what data we process about you, unless we have lawful reasons not to share this data with you, such as trade secrets or in case sharing the data with you would result in serious damage to the rights of you or others.

RIGHT TO CORRECT

You have the right to have inaccurate or incomplete personal data about you rectified or updated. You can do it [here](#).

OTHER RIGHTS

You have also other rights regarding your personal data.

RIGHT TO ERASURE

You may ask us to delete your personal data from our systems if your data is no longer needed for the purposes for which it were collected. You may also ask us to delete your personal data if your data has been unlawfully processed, or if erasure is necessary for us to comply with a legal obligation.

We will erase such personal data from our systems without undue delay unless we have a legal basis to continue processing such data. This may be the case if the data is necessary for complying with our legal obligations or for exercising or defending legal claims.

RIGHT TO ERASURE

You may ask us to delete your personal data from our systems if your data is no longer necessary for the purposes for which it was collected. You may also ask us to delete your personal data if your data has been unlawfully processed, or if erasure is necessary for us to comply with a legal obligation.

We will carry out the actions you requested unless we have a legitimate reason for not deleting the data. This legitimate reason may be based on our legal obligations or on storing data for the purposes of legal action.

RIGHT TO RESTRICT

Under certain circumstances, you may request us to restrict the processing of your personal data. This may be the case if your data has been unlawfully processed and you wish to restrict processing instead of having such data erased. You may also request restriction, if necessary, due to a legal claim. Finally, processing can be restricted when your request for the erasure or correction of your data or a process verifying Finnair's lawful interests is pending.

RIGHT TO RESTRICT

Under certain circumstances, you may request that we restrict the processing of your personal data. This may be the case if your data has been unlawfully processed and you wish to restrict processing instead of having such data erased. You may also request restriction, if necessary, due to the processing of a legal claim. In addition, you may request restricted processing of your personal data

in a situation in which your previous request for erasing or rectifying data is not resolved or if investigating the lawfulness of the processing is still undergoing.

RIGHT TO OBJECT

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data that is based on our lawful interests or necessary for the performance of a task carried out in the public interest including profiling based on those provisions.

Unless we have to process such data for the establishment, exercise or defence of legal claims or have a legal basis for such processing that overrides your rights, we shall no longer process such personal data.

RIGHT TO WITHDRAW YOUR CONSENT

You have the right to change your mind and withdraw any consent you previously provided to us by following the instructions [here](#). The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

RIGHT TO DATA PORTABILITY

In some cases, you have the right to receive your personal data from us in a structured and commonly used format and to independently transmit that data to a third party.

HOW TO USE YOUR RIGHTS

You can use your rights by letter or e-mail as instructed [here](#).

You should include the following information: name, address, phone number and a copy of a valid ID. Please note that we may need to request additional information to confirm your identity.

We will provide you with a confirmation of the actions we have taken due to your request (e.g. confirmation of deletion). We will also let you know if we cannot fulfil a certain request, as well as the reasons behind such a decision.

Making a personal data request is free of charge once every 12 months. For additional requests during this time frame we may charge a reasonable fee to cover the administrative costs involved.

We reserve the right to reject requests that are unreasonably repetitive, excessive or clearly unfounded.

LOGGING A COMPLAINT

If you feel we have not handled your personal data correctly, you can contact the data protection supervisory authority and lodge a formal complaint.

[Icon] Safeguarding your data

HOW WE PROTECT YOUR DATA

At Finnair, we take data protection and compliance with the applicable data privacy laws, including the European Union General Data Protection Regulation, very seriously.

We have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including as appropriate:

- (a) the pseudonymisation and encryption of personal data;
- (b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- (c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- (d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

In practice, this means that your personal data is protected in accordance with the sensitivity of the data and the associated risks. Access to personal data is restricted on a need-to-know basis and by access controls. Our information technology environment is appropriately protected and monitored, with regular updates, testing and assessment to ensure ongoing security.

We continuously train our personnel to comply with data protection legislation as well as applicable policies and instructions.

INTERNATIONAL TRANSFERS OF PERSONAL DATA

Your personal data may be transferred and processed outside of your home country and outside of the European Economic Area.

We transfer your data responsibly. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which it is processed. We provide adequate protection for the transfers of personal data to countries outside of the European Economic Area through a series of agreements with our service providers based on the

[European Union Commission Standard Contractual Clauses](#)

or through other appropriate safeguards, such as the [Privacy Shield Framework](#)

IF SOMETHING SHOULD GO WRONG

We do our best to keep your data safe and secure. If, however, a security breach occurs, we will inform you in case your privacy is likely to have been compromised. We will always provide the information as soon as possible within the time frames set out in data protection legislation.

YOUR ACTIONS MATTER AS WELL

To protect your own privacy, please follow any privacy-related instructions given to you during the recruitment process. We also ask you not to send us extensive or sensitive personal information relating to the recruitment process via an unsecured email.

To protect your privacy please follow the instructions concerning data protection that you have received during the recruitment process. Please avoid sending extensive identification documents or sensitive personal data to us by unsecured e-mails during the recruitment process.