

## **Finnair Group Recruitment Privacy Statement**

### **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, according to the requirements of the EU General Data Protection Regulation (“GDPR”).

The Statement covers all the personal data we may collect when you are applying for a job at Finnair Plc or any 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 regarding its own job applicants. However, the processing of requests related to personal data has been centralized under the care of Finnair Plc for the most part.

We may update this Privacy Statement from time to time.

### **CONTACT DETAILS**

#### **CONTROLLERS**

Finnair Plc. (0108023-3)  
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) (0200991-4)

Tietotie 9, 01530 Vantaa, Finland

## **DATA PROTECTION OFFICER**

Contact Finnair Group Data Protection Officer at: [privacy@finnair.com](mailto:privacy@finnair.com)

Tietotie 9, HOTT

PO Box 15, 01053 Finnair, Finland

## **[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, date of birth, social security number and nationality. We also collect your contact information, such as your address, phone number and e-mail address.

### **YOUR SKILLS, QUALIFICATIONS AND PROFESSIONAL PROFILE**

We process information about your skills, qualifications and proficiencies, for example your language skills, education or licenses. 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.

## **COLLECTION OF SENSITIVE PERSONAL DATA**

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

However, during the recruitment process we may ask for an assessment by a health care professional about 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.

## **DATA IN PILOT RECRUITMENT**

In addition to afore mentioned data, within the pilot recruitment process, we also process the following data: pilot experience, pilot license and qualifications validity, and medical license for aviation.

### **[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**

We process the personal data you have provided us with for recruitment purposes in order to assess your aptitude and evaluate the possibility of entering into an employment contract with you. With your consent we might also process the personal data you have provided us in order to assess our possibilities to enter into an employment contract regarding some other position than the one you have applied for.

### **Based on our legal obligations**

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.

### **Based on your consent**

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. In pilot recruitments we may also receive data from Finnish Aviation Academy, if you have given consent for this.

## **STORAGE PERIOD**

We store your personal data for the time period of the statutory limitation (in general 2 years) after the recruitment has ended for the event of any recruitment-related claims or litigation. However, regarding job positions that require access to Finavia-controlled premises, we are obliged to retain all data regarding your recruitment process (incl. CV, cover letter and assesment results) for the duration of your employment. (EU regulation 300/2018 ja 1996/2015).

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

**SOURCES OF DATA** We primarily get your data directly from you. With your consent, in pilot recruitments we also receive your data from the Finnish Aviation Academy.

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

## **SHARING YOUR DATA**

In certain cases, we may share your personal data with third parties if it is necessary for legal reasons or with your consent. Typically, these include our personnel assessment partners and referees you have provided for us.

## **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 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](#).

## Safeguarding your data

### **HOW WE PROTECT YOUR DATA**

At Finnair, we have implemented appropriate technical and organisational measures to safeguard your personal data and their accessibility, and to prevent their unauthorised use. The circle of users with access to personal data is restricted on a need-to-know basis and by access controls, and processing of personal data is logged. Our information technology environment is appropriately protected and monitored, with regular updates, testing and assessment to ensure ongoing security. Our personnel are trained to comply with applicable data protection legislation as well as applicable policies and instructions.

### **IF SOMETHING SHOULD GO WRONG**

We do our best to keep your data secure. If, however, a data breach occurred, we will inform you according to the requirements set out by the GDPR.

### **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 unsecured email.

## Your rights

### 1) RIGHT OF ACCESS

You have the right to access your personal data processed by us. You can access your applications in our 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 adversely affect the rights and freedoms of others.

### 2) RIGHT TO CORRECT

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

### 3) RIGHT TO ERASURE

You may ask us to delete your personal data from our systems.

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.

After the erasure of your data, you can no longer be taken in to consideration in the recruitment process in question.

### 4) 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, in conjunction with a legal claim. In addition, you may request restriction of the processing of your personal data if investigating the lawfulness of the processing is still undergoing.

### 5) 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.

When withdrawing your consent, you can no longer be taken into consideration in the recruitment process in question.

### 6) RIGHT TO DATA PORTABILITY

In some cases, you have the right to receive your personal data from us in a structured, commonly used and machine-readable 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](#).

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.

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Vantaa