

# **RECRUITMENT PRIVACY NOTICE**

This Recruitment Privacy Notice ("Privacy Notice") informs you of how we collect and process your personal data in connection with recruitment process, according to the requirements of the EU General Data Protection Regulation ("GDPR").

The Notice 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 Kitchen Ltd, Finnair Technical Services Ltd, Finnair Business Services 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.

#### **Controllers**

Finnair Oyj (hereinafter "Finnair") Postal address: PL 15, 01053 Finnair Visiting address: Tietotie 9, 01530 Vantaa

Business ID: 0108023-3

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

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

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

Finnair Business Services Ltd (10769670) Tähe 4, 51050 Tartu, Estonia

Suntours Ltd (Suntours Ltd Ab) (0200991-4) Tietotie 9, 01530 Vantaa, Finland

# Contact details in matters concerning the register

jobs@finnair.com

# **Contact details of the Data Privacy Officer**

Finnair Data Privacy Officer privacy@finnair.com

#### Purposes and legal bases for processing

1) Based on pre-contractual actions

We process the personal data you have provided us with for recruitment purposes 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 to assess our possibilities to enter into an employment contract regarding some other position than the one you have applied for.

# 2) 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.

# 3) 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.

# Personal data processed

We process the following personal data as regards our recruitment candidates:

#### 1) Identification and contact data

Depending on the open position we may collect your basic identity information, such as 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.

# 2) Your skills, qualifications and professional profile

We process information about your skills, competences and qualifications, 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.

In some recruitment processes we may use external service providers' or internal aptitude test process for assessing the candidate(s) suitability for the position. These assessment processes are only implemented with your consent, and their results are applied to the specific recruitment in question.

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

Due to EU 2015/1998 and DOC10804 11.1.3, Finnair is required to confirm and keep a record about work and study history regarding the previous five-year period. In addition, Finnair is required to keep a record of any gaps longer than 28 days in work and/or study history, including their explanations. This may require processing additional documents or information regarding your work and study history for the past five years.

# 3) 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 of whether the candidate is suited for the job. For some positions within our company drug tests are mandatory. These are also carried out by health care professionals.

# 4) Data on 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.

#### Sources of information

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.

#### **Data retention 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 assessment results) for the duration of your employment (EU regulation 300/2018 ja 1996/2015).

#### Recipients of personal 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.

#### Transfer of personal data to third countries

Your personal data may be transferred and processed outside your home country and outside 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.

# Description of technical and organisational security measures

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.

#### Your rights

Data protection laws provide you with certain rights as regards the processing of your personal data:

# 1) Right of access and rectification of personal data

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 <a href="here">here</a> 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.

You have the right to rectify or update inaccurate or incomplete personal data about you rectified or updated. You can make a request here.

# 2) 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 into consideration in the recruitment process in question.

# 3) Right to restriction of processing

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.

# 4) Right to withdraw consent for the data for which there is no other basis for processing

You have the right to change your mind and withdraw any consent you previously provided to us by following the instructions <a href="here">here</a>. 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.

#### 5) 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.

You may exercise your rights by contacting datarequestemployee@finnair.com. You will always receive confirmation of the actions we have taken on your request (e.g. data erasure confirmation). We will also let you know if we cannot fulfil your request and provide the reasons behind such decision. We reserve the right to reject requests that are unreasonably frequent or extensive and manifestly unfounded.

The data subject has also the right to file a complaint to the supervisory authority if he considers that the processing of his personal data violates the applicable data protection regulations.

# **Changes to this Privacy Notice**

We may, from time to time, make changes to this Privacy Notice. Please review this Privacy Policy periodically for updates.

This Privacy Notice was last updated on 30 September 2025.