

## Privacy statement for recruitment register

Updated 31 December 2025

### Joint controllers:

Luotea plc and all group companies belonging to the same group in Finland (hereinafter "Luotea")

Companies belonging to Luotea group:

Luotea plc (1680140-0)

Luotea Siivous Oy (3155982-7)

Luotea Kiinteistöhuolto Oy (3155934-1)

Luotea Kiinteistötekniikka Oy (3155933-3)

Each Luotea group company is responsible for the processing of personal data in its own business for the purposes and on the legal grounds in accordance with this privacy statement and may use the necessary personal data collected by other group companies for the same purposes.

### Contact details in matters concerning the register:

Name: Luotea plc

Business ID: 1680140-0

Postal and street address: Kutomotie 2, FI-00380 Helsinki, Finland

Telephone: +358 (0)10 590 2000

Email: [tietosuoja@luotea.com](mailto:tietosuoja@luotea.com)

### Name of the register:

Luotea Group recruitment register

### Legal basis for and the purpose of the processing of personal data:

The purpose of the processing of personal data is the recruitment of Luoteas' personnel. The legal bases for the processing of personal data are Luotea's legitimate interest (such as the applicants' applications and recruitment processes), and regarding the personal evaluation and aptitude assessment, the data subject's consent.

### Data subject categories:

Luotea applicants

### Data content of the register:

The register contains the following personal data on the applicant necessary for the purposes of the recruitment process and the applied position:

Profile details (mandatory information)

- first and last name
- contact details (postal address, email address and telephone number)
- date of birth
- sex
- nationality and country of residence
- native language
- username and password to the service

Data collected during the recruitment process and concerning the application

- data concerning the application and résumé, such as work history information, education, language skills, skills, positions of trust and salary expectation
- data concerning the applied position
- data related to the interview, personal evaluation and aptitude assessment
- safety assessment and drug testing data as well as personal credit reports
- data concerning the progress of the recruitment process and appointment
- possible additional data provided by the applicant

**Regular sources of data:**

The data are primarily retrieved from the data subject. In addition, the data consist of information stored during the recruitment process.

**Regular disclosure and transfers of data:**

The personal data is not regularly disclosed.

Luotea uses external service providers to process personal data for the following services:

- Systems maintenance, development (incl. testing) and troubleshooting;
- recruitment; and
- personal evaluations and aptitude assessments.

Each service provider processes personal data in accordance with the data processing agreement only to the extent necessary to provide the service.

**Transfer of data outside the EU or EEA:**

Luotea and its subcontractors may process personal data outside the EU or the EEA. If the European Commission has not issued a decision on the adequacy of data protection, an agreement on the transfer of personal data in accordance with the standard clauses approved by the European Commission is generally drawn up with the service provider. As an alternative to the use of standard clauses, Luotea also has the right to transfer personal data using other means of transfer permitted by legislation.

**Principles of register protection:**

The data in the register is stored in an information system that uses both technological and programmatic measures to ensure a sufficient level of data security and to monitor the use of the data. Access to the data in the register is restricted to the people in charge of recruitment. Each person using the register has a personal username and password to the system. All people using the data in the register are bound by professional secrecy.

**Data retention period:**

The applicants' personal data (application and résumé) are stored for twenty-four (24) months from the last update made to the application.

The applicants' profile details are stored for twenty-four (24) months after the profile has been created or after the most recent update to the profile. Data subjects have the right to erase the profile details they have stored in the electronic recruitment system at any time.

**Rights of the data subject:** *Right of inspection and right to request rectification or erasure*

Data subjects have the right to inspect their personal data entered in the register. In addition, data subjects have the right to request the rectification of inaccurate data and erasure of data. Inspection, rectification and/or erasure requests must be submitted in writing by using the above contact details. In addition, data subjects have the right to erase the profile details they have stored in the electronic recruitment system at any time.

*Right to withdraw consent*

Data subjects shall have the right to withdraw their consent for the processing of their personal data, for example, concerning data related to the personal evaluation, aptitude assessment or drug tests. Withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal.

*Other rights*

According to the General Data Protection Regulation data subjects have the right to object to or request a restriction and transfer on the processing of their personal data and to lodge a complaint regarding the processing of their personal data to the data protection authority.