PRIVACY POLICY

Processing of the personal data of employees recruited by PlusTerveys Hammaslääkärit Oy.

WHO PROCESSES YOUR DATA?

PlusTerveys Hammaslääkärit Oy (business ID: 2630918-8, address Malmin asematie 6, FI-00700 Helsinki, Finland, hereinafter referred to as "we") will process your personal data when you use the online service to submit a contact request or a job application to the recruitment services of PlusTerveys Hammaslääkärit Oy or PlusTerveys Kvalident Oy.

1 CONTACT INFORMATION OF THE DATA PROTECTION OFFICER

The Data Protection Officer is Petri Hammar, and his contact details are:

PlusTerveys Hammaslääkärit Oy Tietosuojavastaava Malmin asematie 6, FI-00700 Helsinki, Finland tietosuoja@plusterveys.fi

Please contact the data protection officer if you have any questions about data protection or if you want to exercise your rights.

2 TYPES OF PROCESSED PERSONAL DATA

We will process the following information required for contacting you and for recruitment purposes:

The basic information you have provided, such as:

- name
- contact information: telephone number and e-mail address
- place of residence
- education/occupational title
- work experience and competence
- CV
- other additional information provided by you

If you use our online services, the following information will also be collected:

 Location data. We may display available appointments at the nearest clinics based on the user's location data. The user is separately asked for permission to use their location data. The services can also be used without accepting the use of location data.

- Ad tracking. We use ad tracking to monitor the effectiveness of advertising. This function helps identify ads most suited for consumers and most functional for PlusTerveys.
- Analytics. We use analytics to monitor the use of the site in order to understand how people use our site and how to develop the site accordingly. Our goal is to provide better services to the users of our site.
- Social media. We monitor PlusTerveys content shared in social media (e.g. Facebook). This helps us produce content that interests consumers and is actively shared in social media.

We provide more detailed descriptions of the features supporting the development of the services, marketing and functionality for each separate service.

You are required to provide your basic information before you use our services.

3 PURPOSES OF PROCESSING YOUR PERSONAL DATA

We will process your personal data in order to inform you of job opportunities and news at PlusTerveys and to develop our recruiting processes. The data will also be used to verify the certification of social welfare and health care professionals with the register of social welfare and health care professionals (JulkiTerhikki) when receiving the application or request for contact.

In terms of our online services, we use pseudonymised personal data for analysing, categorising and reporting customer relationships and for developing our business operations, including training customer service staff and developing the quality of our customer service.

4 GROUNDS FOR PROCESSING YOUR PERSONAL DATA

We will process your data on the basis of your consent in order to prepare and implement communication and inform you of job opportunities according to your request.

5 DISCLOSURE OF YOUR PERSONAL DATA

Only the individuals taking part in the recruiting process will process your personal data. We will not disclose your data to third parties.

We have outsourced some of the processing of personal data to the following service providers who will process your personal data related to our online services on our behalf:

- Administration and development of the website
 - o Karhu Helsinki Oy
- Website analytics, marketing design, media design and procurements
 - Quru Oy
 - Mainostoimisto SEK Oy

o Mediatoimisto Voitto Oy

Our websites use cookies from Google, Facebook and Twitter. These are detailed in the service-specific descriptions. Data collected by the cookies may be stored on the servers of the aforementioned operators that may be located outside the EU or EEA area and are, therefore, subject to their local data protection legislation.

6 TRANSFER OF YOUR PERSONAL DATA TO THIRD COUNTRIES

We will not transfer your personal data outside the EU or the EEA area.

7 STORAGE PERIOD OF YOUR PERSONAL DATA

We will store the personal data for no longer than is necessary for the purposes for which the personal data are processed. We will retain the open application information you submit for twelve (12) months. We store job-specific applications for six (6) months after receiving them. By your request, we will store your data for longer.

8 YOUR RIGHTS

8.1 Right of access to personal data

You have the right to obtain from us confirmation as to whether or not personal data concerning you is being processed. You also have the right of access to personal data concerning you and information on the processing of your personal data in accordance with the General Data Protection Regulation.

When you exercise your right of access to the data, we will send you a copy of your personal data processed by us. If you ask for several copies during a calendar year, we may charge a reasonable fee based on administrative costs.

8.2 Right to rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

8.3 Right to erasure

You have the right to obtain from us the erasure of personal data concerning you without undue delay if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw consent on which the processing is based and where there is no other legal ground for the processing;
- you object, on grounds relating to your particular situation, at any time
 to processing of personal data concerning you, and there are no
 legitimate grounds for the processing, or you object to processing of
 personal data concerning you for direct marketing purposes;

- we have processed the personal data unlawfully; or
- the personal data have to be erased for compliance with a legal obligation.

8.4 Right to restriction of processing

You have the right to obtain from us restriction of processing so that, in addition to storage, your personal data may only be processed with your consent or for the establishment, exercise or defence of legal claims or to project the rights of another person, where:

- you contest the accuracy of the personal data, whereupon the processing will be restricted for a period enabling us to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; or
- you have objected, on grounds relating to your particular situation, to processing of personal data concerning you and are waiting for a decision on whether our legitimate grounds for the processing override the grounds for your objection.

8.5 Right to data portability

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where:

- the processing is carried out by automated means; and
- the processing is based on your consent or necessary for the performance of a contract between us or in order to take steps at your request prior to entering into a contract.

The right to data portability is restricted to a procedure that will not adversely affect the rights and freedoms of others.

8.6 Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, if there are no legitimate grounds for the processing.

8.7 Right to withdraw consent

Where processing is based on your consent, you have the right to withdraw your consent to the processing of personal data at any time.

You can withdraw your consent by contacting our data protection contact person: tietosuoja@plusterveys.fi.

8.8 How to exercise your rights

You can exercise your rights by contacting the data protection officer: tietosuoja@plusterveys.fi.

9 RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

You have the right to lodge a complaint with the data protection ombudsman if you consider that your rights under the General Data Protection Regulation are infringed in the processing of your personal data.

10 SOURCES OF YOUR PERSONAL DATA

We primarily obtain your personal data from you, and customer data is also collected as described above when you use our services.

11 INFORMATION SECURITY IN PROCESSING PERSONAL DATA

We store your personal data in systems protected with firewalls, passwords and other technological and organisational means generally accepted across the industry at each time.

Our manually administered materials are located in facilities not accessible to unauthorised individuals.

Only our employees who are required to process personal data by their work-related duties have access to the personal data processed by us.