

PRIVACY POLICY FOR RECRUITING

1 GENERAL INFORMATION

The protection of your personal data is important to 3Step IT Group Oy and its affiliated companies (hereinafter referred to as "3stepIT" or "we"). In this privacy policy, we provide information required by the General Data Protection Regulation 2016/679 of the European Union ("GDPR") to data subjects. This privacy policy explains how we collect, retain and otherwise process personal data for recruitment, candidate sourcing and headhunting purposes.

We describe how we process the personal data of the hired employee in the 3stepIT's privacy policy for employees.

Please note that 3stepIT has offices around the world and your information might be processed in other entities as well during your recruitment process. This means that information provided by you might be available to HR and recruiting personnel within the global organization in accordance with the GDPR and other applicable regulations governing the processing of your personal data.

This privacy policy applies to the processing of personal data carried out by 3stepIT as a data controller in recruitment context and will be updated from time to time.

2 CONTROLLER AND CONTACT DETAILS OF THE CONTROLLER

The data controller for your personal data may be either 3Step IT Group Oy (business ID 2087590-4) or any of its affiliated companies, depending which company has a contractual or other relationship with you, mainly depending to which company you have submitted your application or which company has possibly contacted you when sourcing candidates.

3Step IT Group Oy, Limited Liability Company registered in Finland acts as a contact point for all 3Step IT Group companies in privacy related requests:

Registration number: 2087590-4

Office address is: Mechelininkatu 1A Helsinki 00180, Finland

The general phone number is: +358 10 525 3200

Data Protection Officer: dpo(at)3stepit.com

If you have any questions relating to our use of your personal data under this privacy policy, please contact our Data Protection Officer at the contact details provided above or use the [contact form](#) provided on our website: tell us a bit about your enquiry and we will pass it to the right expert.

The contact details of all 3Step IT Group Oy's affiliated companies can be found below:

4Lighthouse Oy Business ID 2788122-3 Mechelininkatu 1A 00180 Helsinki Registered in Finland	2holding N&B Oy Business ID 2941130-5 Mechelininkatu 1A 00180 Helsinki Registered in Finland	3Step IT Oy Business ID 2161942-7 Mechelininkatu 1A 00180 Helsinki Registered in Finland	3 Step IT AS Business ID 878703812 Wergelandsveien 7 0167 Oslo Registered in Norway
3 Step IT A/S Business ID 26106427 Vandtårnsvej 62 2860 Søborg Registered in Denmark	3 Step IT Sweden AB Business ID 556488-0218 Drottninggatan 19 582 25 Linköping Registered in Sweden	3 Step IT Services Limited Business ID 13762523 100 Liverpool Street EC2M 2AT London Registered in United Kingdom	3Step IT OÜ Business ID 10731756 Telliskivi 60/2 Tallinn 10412 Registered in Estonia
3 Step IT, Inc. 2521 Golden Bear Drive – Suite 120, Carrolton Registered in Delaware, USA	3S DC Lifecycle Management Inc. 30 Technology Drive, Warren, NJ Registered in Delaware, USA	3 Step IT Corp. Business ID 72786 9224 181 University Ave, Suite 2100, Toronto Registered in Ontario, Canada	

3 PURPOSES AND LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA

In this privacy policy, personal data means information that identifies job applicants and potential candidates for employment with us, either submitted as part of the application, through alternative channels or when candidates are contacted by 3stepIT.

All data processing that is described in this privacy policy is done in order to carry out recruitment processes, candidate evaluation, candidate sourcing and communication. The table below lists, by category, the purpose, the legal basis and the categories of personal data processed. For a more detailed description of the categories of personal data to be processed, see section 4.

Purpose	Legal basis	Categories of personal data
Assess the potential grounds for entering into an employment contract with the person	Legitimate interest of the data controller / Pre-contractual measures taken at the request of the data subject	Identification data, data on employment history and current job, education and training data, data on aptitude assessments, other job-related information voluntarily provided by the candidate to the controller (including also financial related information whenever relevant per role and health data where permitted by applicable law and where an appropriate condition for processing special category data applies)
Communication	Legitimate interest of the data controller	Identification data
Contacting referees	Legitimate interest of the data controller	Identification data of the referees
Candidate evaluation based on referees	Consent of the data subject	Data collected from referees regarding the candidate.
Candidate sourcing	Legitimate interest of the data controller	Only data that is necessary for identifying and contacting potential candidates and assessing their professional suitability at a general level using publicly available professional data (e.g. profile on LinkedIn or other professional networking platforms).

4 CATEGORIES OF PERSONAL DATA

This table further defines the categories of personal data referred to in section 3 to the extent that they are not otherwise unambiguously defined in that section. Please note that some of the data types listed here are only processed if you provide such information to us. You will find the compulsory data types marked with a red star when you fill out our application.

Category of personal data	Content of the category
Identification data	The name and contact details of the natural person (data subject), i.e. email address, telephone number and home address, a photograph of the candidate
Data on employment history and current job	Information on previous employers and the current employer, duration of previous employment, type of work and title
Education and training data	Degrees and training completed, transcripts and diploma, records of academic achievements, scholarships and other awards, and any other certificates held by the candidate
Data and results of aptitude assessments	Data on the results and suitability of the aptitude assessment
Other job-related data voluntarily provided by the candidate to the controller (including also health and financial related information whenever relevant per role).	Information contained in the personal letter and CV, information of where the candidate first saw the opportunity, and other information provided by the candidate during the interview, such as skills and competences, salary requirements, age, date of birth, title, skills, hobbies and interests, and information on leisure activities such as extracurricular activities and information from credit checks, criminal records and substance tests whenever relevant per role and allowed by the applicable legislation.
Identity data of referees	Name, title, company, email and phone number of the referee
Data collected from referees	Information on the candidates' performance at work
Data collected from LinkedIn account	The information the candidate has published in LinkedIn (i.e. work history, achievements and education)

5 SOURCES OF PERSONAL DATA

In the context of recruitment, primarily we obtain the data we process directly from the candidate in the context of job applications, aptitude assessments, interviews and other encounters. However, some personal data may be collected from third parties if and to the extent necessary for processing purposes described in this privacy policy and allowed by the applicable laws. With the consent of the candidate, we may also receive data from referees appointed by the candidate.

In limited situations, we may also collect background information such as information on credit checks and criminal records. In such limited cases where we do process such data, we do this in accordance with applicable legislation as in force from time to time and inform you about such collection. We will ask for your consent when necessary.

The provision of personal data is voluntary to the extent that it is up to the data subject to decide whether to apply or continue in 3stepIT's recruitment process. However, if the data subject participates in the 3stepIT's recruitment process, the provision of sufficient information to carry out the assessment is mandatory for the recruitment to take place. Without sufficient information, we are unable to assess whether the candidate would be suitable for the position and therefore, without sufficient information, we cannot consider the candidate for the position.

6 RECIPIENTS OF PERSONAL DATA AND CATEGORIES OF RECIPIENTS

3stepIT processes personal data within the 3stepIT organization and uses external service providers, who act as data processors and process personal data on behalf of 3stepIT.

Only 3stepIT's employees who are involved in the recruitment process as part of their job duties and who therefore need the data to carry out the recruitment process will process the personal data of candidates. Even then, the data will only be processed to the extent necessary for the performance of their tasks. All 3stepIT's employees are bound by confidentiality agreements.

In addition, 3stepIT discloses personal data to companies that act as 3stepIT's service providers for recruitment platforms and aptitude assessments. Those service providers process personal data only to the extent necessary to provide the service in question or in connection with system maintenance and troubleshooting. 3stepIT concludes a contract to process personal data with all of its subcontractors who process personal data on behalf of 3stepIT. In addition, contracts concerning the use of personal data are also concluded with service providers that are not acting as processors. Further information on the processing of data by such service providers can best be found on their own websites. Each service provider processes personal data only to the extent necessary for the provision of the service.

There might be other exceptional situations where personal data can be disclosed to other parties than those described above. We may also transfer or disclose personal data to:

- authorities if required by applicable laws;
- certain regulated professionals such as lawyers or auditors when needed under specific circumstances (litigation, audit, etc.) as well as to actual or proposed purchaser of the companies or businesses of the 3stepIT;
- other external parties, if (i) 3stepIT is involved in a corporate transaction, personal data may be disclosed to third parties in relation to such transaction in accordance with the applicable data protection laws; or (ii) there is a need to detect, prevent or otherwise address crime and/or security issues; or (iii) there is a need to protect 3stepIT's interests in case of potential claims and civil litigation relating in the recruitment context.

7 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

As some of our affiliates, service providers, and partners are located outside the European Union and European Economic Area, we may need to transfer personal data outside the EU/EEA to carry out our operations. Transfers of this kind are done according to the requirements of the applicable laws, and by following the applicable safeguards for the transfers, e.g. based on adequacy decisions on the level of data protection adopted by European Commission, or using standard contractual clauses approved by European Commission, or other applicable data transfer mechanisms.

8 DATA RETENTION PERIOD OR CRITERIA FOR DETERMINING THE RETENTION PERIOD

Your personal data will be primarily retained for up to two (2) years after the application filing date in the 3stepIT's recruitment database, unless a shorter or longer retention period is required by applicable law or justified by the circumstances of the recruitment process.

With your consent, we may also process and retain your personal data for a longer period to fulfil our interests in connection with candidate sourcing.

In addition, we can store personal data for as long as necessary to establish, exercise or defend legal claims, or to comply with legal or regulatory obligations.

9 SECURITY OF THE PROSESSING

We apply appropriate technical and organizational measures to keep your personal data secure. We use physical, administrative, and technical security measures to reduce the risk of loss, misuse, or unauthorized access, disclosure, or modification of your personal data. Your data can only be accessed by persons for whom it is necessary in relation to their work and on a need-to-know-basis. Our security controls are designed to maintain an appropriate level of data confidentiality and integrity.

10 RIGHTS OF THE DATA SUBJECT

In accordance with applicable regulations and where applicable, you have the following rights:

Rights of the data subject	
Right of access your data	You can obtain information relating to the processing of your personal data and request a copy of such personal data. If you make your request electronically and have not requested another form of delivery, the data will be provided in the commonly used electronic format.
Right to rectify your data	Where you consider that your personal data is inaccurate or incomplete, you can request that such personal data is modified accordingly.
Right to erase your data	You can require the deletion of your personal data, to the extent permitted by law. However, a request to delete personal data cannot be implemented if the personal data is stored, for example, to comply with a legal obligation.
Right to restrict the processing of your data	In certain cases, you have the right to request the restriction of the processing of your data.
Right to object to the processing of your data	You can object to the processing of your personal data, on grounds relating to your situation. 3stepIT may refuse a request if the processing is necessary for the legitimate interests of 3stepIT or a third party.
Right to withdraw your consent	Where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.
Right to transfer data from one system to another	Where legally applicable, you have the right to have the personal data you have provided to us to be returned to you or, where technically feasible, transferred to a third party. To the extent that we process your data on a contractual basis and the processing is carried out automatically, you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and the right to transfer that data to another controller.
Right to lodge a complaint with a supervisory authority	You have the right to lodge a complaint with the competent supervisory authority if you consider that data protection legislation has not been respected in the processing of your personal data.

If you wish to exercise any of these rights, please send your request to our Data Protection Officer, the contact information of which is provided at the beginning of this policy.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to anyone who has no right to receive it. Where necessary, we may request additional information, such as a copy of identification, but only where appropriate and proportionate to the request.

We may also contact you to ask you for further information in relation to your request to facilitate and respond to your request more efficiently.