

## Privacy notice – Hannes Snellman

### Recruitment

#### 1 The Controller

The controller of the personal data is Hannes Snellman Attorneys Ltd (“Hannes Snellman”). All contacts and inquiries related to this privacy notice should be addressed to [privacy@hannessnellman.com](mailto:privacy@hannessnellman.com).

#### 2 Types and Sources of Personal Data Collected and Processed

Hannes Snellman processes only personal data obtained directly from an applicant applying for a position at Hannes Snellman (each individually “**Applicant**”). The Applicant is solely responsible for the content of the application. The personal data is processed for the purposes of the recruitment process.

Hannes Snellman collects and processes Applicant data (required and optional) which an Applicant provides directly, via forms and attached resumes or CVs, on the Hannes Snellman recruitment website or otherwise. Hannes Snellman also collects and processes applicant data through personal contacts, phone calls or e-mails that the Applicant may have with Hannes Snellman.

The Applicant data includes:

- Contact details (such as name, date of birth gender, address, phone number, language);
- Education (such as academic, courses, special abilities);
- Work history (such as previous employers, references); and
- Other information related to the Applicant, which the Applicant decides to disclose to Hannes Snellman.

#### 3 Purposes and Legal Grounds for the Processing

We process the personal data for the following purposes:

- (a) To carry out the recruitment process and to comply with legal obligations

Hannes Snellman processes the Applicant’s personal data pursuant to its legitimate interests to carry out the recruitment process (GDPR Art. 6.1(f)). Hannes Snellman also processes the Applicant’s personal data to comply with its legal obligations under employment laws and other applicable laws (GDPR Art. 6.1(c)). If Hannes Snellman must process sensitive or special categories of personal data during the recruitment process, an explicit consent of the Applicant is requested (GDPR Art. 9.2(a)). When the Applicant is selected as a Hannes Snellman employee, processing is carried out in order to take the necessary steps prior to entering into an employment contract at the request of the Applicant (GDPR Art. 6.1(b)). Thereafter processing is based also on the legal obligations of Hannes Snellman as an employer and is further described in a separate notice.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>• Contact details (such as name, date of birth gender, address, phone number, language);</li> <li>• Education (such as academic, courses, special abilities);</li> <li>• Work history (such as previous employers, references); and</li> <li>• Other information related to the Applicant, which the Applicant decides to disclose to Hannes Snellman.</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in carrying out the recruitment process.</p> <p><i>Legal obligations.</i> The processing is necessary to fulfil our legal obligations within the field of employment.</p> <p><i>Contract.</i> The processing is necessary to prepare for and fulfil the employment agreement with you.</p>
	<p><b>Exemption for special categories of data</b></p> <p>Special categories of personal data (such as health data) are processed to carry out obligations and exercise rights in the field of employment law, as well as to establish, exercise and defend legal claims.</p>

**Retention period**

The Applicant’s personal data is retained for a) 24 months after the filing date of the respective application (for example open applications) or b) 24 months after the recruitment process for which the application has been sent or has been closed, whichever is later. After said date the data is erased unless applicable law requires longer retention.

- (b) To send out information about marketing about future career opportunities at Hannes Snellman as well invitation to Hannes Snellman events
- (c) Hannes Snellman also uses the personal data for the purpose of sending information about Hannes Snellman, its future career opportunities as well as invitations to Hannes Snellman events. The legal basis for such processing of personal data is the legitimate interest (GDPR Art. 6.1(f)) of Hannes Snellman to adequately notify Applicants of relevant information. To the extent the processing is electronic direct marketing, pursuant to applicable law, an explicit consent of the Applicant is requested when required under applicable law.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>• Contact details (such as name, date of birth gender, address, phone number, language).</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in carrying out the recruitment process.</p>
	<p><b>Exemption for special categories of data</b></p> <p>N/A</p>

**Retention period**

The Applicant’s personal data is retained for a) 24 months after the filing date of the respective application (for example open applications) or b) 24 months after the recruitment process for which the application has been sent or has been closed, whichever is later. After said date the data is erased unless applicable law requires longer retention.

#### 4 Disclosure of data

The Applicant's data is disclosed to Hannes Snellman's cooperation partners (such as aptitude test service providers), if required by the recruitment process. Prior to disclosing any information to any third party, Hannes Snellman will ensure that all third-party recipients are bound to strict standards of data security and confidentiality.

The Applicant's data is not transferred outside of the EU/EEA.

#### 5 Retention Period

The Applicant's personal data is retained as further detailed under section 3 above. If you want to learn more about our specific retention periods for your personal data, you may contact us at [privacy@hannessnellman.com](mailto:privacy@hannessnellman.com).

Hannes Snellman evaluates the necessity and accuracy of the personal data on a regular basis.

#### 6 Principles of how the personal data is secured

The personal data will be processed lawfully, fairly and in a transparent manner, collected for specified, explicit and legitimate purposes, and will not be further processed in a manner that is incompatible with said purposes mentioned in this privacy notice. Hannes Snellman will only process adequate and relevant personal data, limited to what is necessary in relation to the purposes for which it is processed.

Hannes Snellman takes appropriate technical and organisational measures against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data in accordance with our internal security procedures covering the storage and destruction of personal data as well as access to personal data. We regularly check our security policies and procedures to ensure our systems are secure and protected. Only the personnel who need to process your personal data for the purposes mentioned above have access to your personal data. All specific personnel at Hannes Snellman as well as third-party service providers are required to treat the personal data strictly confidentially.

#### 7 The Applicants' rights as a data subject

You, as a data subject, have certain rights in relation to the processing of your personal data. To the exercise the rights, described herein, please submit requests to the [privacy@hannessnellman.com](mailto:privacy@hannessnellman.com).

<b>Access</b>	You may request confirmation whether personal data about you is processed by us and, if that is the case, access your personal data and additional information regarding the operation, such as the purposes of the processing. You are also entitled to receive a copy of the personal data undergoing processing.
<b>Object to certain processing</b>	You have the right to object to the processing of your personal data based on a legitimate interest for reasons which concern your particular situation. In such a situation, we will stop using your personal data where the processing is based on a legitimate interest, unless we can show that the interest overrides your privacy interest or that the use of your personal data is necessary to manage or defend legal claims.
<b>Rectification</b>	You have the right to obtain from us the rectification of inaccurate personal data concerning you.
<b>Erasure</b>	You may have your personal data erased under certain circumstances, such as when your personal data is no longer needed for the purposes for which it was collected.

<b>Restriction of processing</b>	You may ask us to restrict the processing of your personal data to only comprise storage of your personal data under certain circumstances, such as when the processing is unlawful, but you do not want your personal data erased.
<b>Withdrawal of consent</b>	You have the right to at any time withdraw your consent to the processing of personal data to the extent the processing is based on your consent.
<b>Data Portability</b>	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 ask for the information to be transferred to another data controller (where possible).

Click [here](#) to read more about the rights that you have in relation to the processing of your personal data.

Please note that if we restrict or delete your personal data, this may result in us not being able to continue the recruitment process or provide you with the communications and invitations described above. We might also be obliged to prevent you from exercising your rights if the personal data relates to our client work or when confidentiality and other obligations under applicable law and the Bar Rules apply.

If you consider that your rights under the applicable data protection laws have been infringed, you may lodge a complaint with the competent supervisory authority (*Tietosuojavaltuutetun toimisto*).