

1. General

Laitakarin Kala Oy is a limited liability company established in Finland. This General Privacy Policy informs you of how we collect, use, store, disclose and otherwise process personal data about you, when you are:

- a **candidate** applying for a position or to otherwise work with us,
- our **client** or **partner** (whether existing, prospective or past), their representative, or our contact in one, and/or
- a **visitor** to our website.

The primary general data protection laws governing our activities are the EU General Data Protection Regulation (2016/679) and the Finnish Data Protection Act (1050/2018).

Please note that in some instances our services may involve processing some personal data controlled by our clients or partners. In such cases we act as processors on *behalf* of the controllers in question and are bound by data processing agreements entered into with any controller, as required by applicable data protection laws. This Privacy Policy does not cover such activities.

We may collect personal data when you provide it as a candidate on our recruitment platform or in any other manner during the recruitment process, when we receive or obtain it in the context of a business relationship with a client or a partner, or when you visit any of our websites.

The categories of data we process include information on your cookie and/or other consent preferences, business contact data, candidate professional background as well as any communications, information exchange and any other information shared in the context of either your recruitment process or the relevant business relationship, including third-party platform data shared with us in that context from services like Microsoft Services.

We always strive for privacy first. While considering how to best serve our clients and candidates, we will also try to keep the personal data we process to a minimum and use data in the least identifiable form possible.

The purposes we process personal data for include handling applications and otherwise managing your recruitment, managing business relationships, promoting and providing our services, and developing and conducting our operations, managing your website experience, and where necessary, for general business administration, financial and risk management, exercising our legal rights or for obtaining professional advice.

Legally, our processing of personal data is based mainly on our legitimate interests (see details below), in which case you have the right to object to the processing at any time, on grounds relating to your particular situation, by contacting us as detailed below. Certain

individual processing activities, where relevant, may be based on your consent (which you can revoke at any time), our legal obligations, or the performance of a contract.

We keep your personal data only for as long as we have a legitimate commercial reason to retain it for any of the purposes mentioned above.

We protect your personal data by using technical and organizational measures designed to provide a level of security appropriate to the risks.

We disclose your data only where necessary for the purposes mentioned above to the types of recipients listed below and as identified in more detail, where possible, on this page.

For any questions or requests, please email timo.karjalainen@laitakarinkala.fi

2. Controller

- Laitakarinkala Oy
- Business ID: 2725554-8

3. Contacting us

If you have any questions about this Privacy Policy, including any requests concerning your rights as a data subject, please contact us at timo.karjalainen@laitakarinkala.fi

4. How we process your data

4.1 Candidates

We process candidate data necessary for the purposes of handling applications and otherwise managing recruitment.

We compile and collect this data from you when you provide it on our recruitment platform or in any other manner during the recruitment process, for example, as part of your CV or LinkedIn profile.

The categories of personal data we process for the above purposes include:

- **Basic personal data and contact details**, such as name, email, phone number, address, and photographs and videos of you, where relevant.
- **Information related to your professional background and expertise**, such as your work history, education, expertise, certifications and qualifications, language proficiencies, and other relevant professional background information.

- **Communications** and conversations between us and/or otherwise related to the recruitment process, including your responses to questions asked throughout the process.
- **Platform profile information** about you, where relevant, from platform services like LinkedIn, Facebook or other social media that we may integrate to our services from time to time and that you may have chosen to allow us to access. The extent and precise categories of data shared in this way may depend on the platform and the settings or permissions you have selected in the context of choosing to share the data with us and/or otherwise using the service subject to separate privacy policies and contractual terms between you and the service provider in question, where applicable.
- **Other files and information** provided by you in the context of the recruitment process.

To ensure that we have a valid legal basis for the above processing of personal data under applicable data protection laws, we have determined that (i) this processing is necessary for our legitimate interest of the candidate selection and recruitment we carry out as a core part of our business, and that (ii) this interest is not overridden by your fundamental freedoms and rights or privacy interests. Only personal data that is relevant and necessary for the above purposes is collected and processed, and we take steps to ensure it is obtained either directly from you as the data subject or otherwise with your knowledge and approval.

4.2 Client, partner and marketing contacts

We process personal data received or obtained in the context of, or related to, our ongoing, prospective and, where relevant, past business relationships with clients and other partners for the purposes of managing business relationships, promoting and providing our services, and developing and conducting our operations.

We may receive or obtain such data from you when you (as the client, partner or representing one) send contact requests or other queries to us, in the context of business relationships or other dealings with us (e.g., contact details to communicate with you), or from reliable public sources such as public company databases, where relevant and necessary for a purpose mentioned or compatible with the above.

The categories of personal data we process for the above purposes include:

- **Contact and company information**, such as name, phone number, email, company details and address.
- **Details related to role and position in business**, such as job title, position and duties, areas of responsibility, rights of representation and other similar organizational information, where relevant.

- **Client, partner and marketing communications and related information**, such as email conversations, client or partner requests and other correspondence and exchange of data related to a business relationship irrespective of its lifecycle.
- **Other information specific to the business relationship**, such as project-related details or other information related to specific activities within the relationship.
- **Platform information** about you, where relevant, on platform services like LinkedIn or Facebook that we may integrate to our services from time to time and that you or your company or employer may have allowed us to access. The extent of data shared in this way may possibly also depend on the platform and the settings selected within the service subject to separate privacy principles and contractual terms.

The above processing is based on our legitimate interests to maintain our business relationships, promote and provide our services, and further develop our operations. We have determined that these interests do not compromise your fundamental freedoms and rights or data protection interests, since the data and processing are necessary for and limited only to our legitimate and professional business activities.

4.3 Website and cookies

On our main website at laitakarinkala.fi, we use cookies to, e.g., store your preferences regarding cookie permission, language selection and theme. This processing is based on your separate consent, if obtained via the cookie consent banner presented to you before your initial acceptance or rejection. You can also opt out of and manage your consent to such cookies later at any time on our website.

We may also employ various technologies for website analytics, performance measurement, troubleshooting and information security on our site. While doing so, our intention is not to identify or single out our visitors, but depending on the choice of technology, this may involve the use of cookies or similar technologies and/or be considered as processing personal data of the visitor, in which case we will ask for your consent accordingly. To the extent our use of these technologies does not rely on your consent, we have determined that the possible processing of your personal data for these purposes is based on our legitimate interest in ensuring and improving the stability and functionality of our services.

4.4 Other processing

In individual cases and circumstances, where legally required, we may rely on a consent obtained from you separately in that context. You may later revoke such consent at any time.

Certain processing of the personal data of our clients, partners and candidates may be carried out for general business administration and financial management purposes, mainly the collection and retention of documentation and other materials in connection with

taxation, accounting and other such statutory duties and requirements. This kind of processing is based on our compliance with legal obligations.

Also, we may process any data collected as described above for the establishment, exercise, or defence of legal claims, where necessary. Such processing is based on the legitimate interests of ours or those of another party (such as, in particular, the protection of the legal rights of ours, yours or those of our clients, partners or data subjects other than you). We may also process your personal data to the extent necessary for the purposes of managing our legitimate risks or obtaining professional advice. The legal basis for this is our legitimate interest in the lawful, necessary and proportionate protection of our business against risks of any kind.

If you need details about the legal grounds we are relying on with respect to specific data or circumstances, please contact us as set out above.

5. How we share and transfer your data

Where necessary and solely to the extent necessary for the purposes detailed above, we may disclose your personal data to the following categories of recipients

- Job applicants when you apply for a open position. Where relevant, these recipients will process your personal data as separate controllers and will be individually responsible for making the required information on their own processing activities available to you as their data subject.
- Service providers or partners that we rely on to a significant extent to carry out the activities described in this Privacy Policy. These recipients include, in particular, any service providers of recruitment and customer relationship management systems we decide to use for the above-mentioned activities.
- Our service providers for the purposes of accounting, financial, ICT, legal and other regular business administration or financial management services, to the limited extent they participate in the processing of your personal data.
- Buyers or potential buyers (and their agents and advisers) in connection with any purchase, merger or acquisition of any part of our business, provided that the information is used only to the extent necessary for such purposes and safeguarded by information security measures essentially corresponding to the level provided for by this Privacy Policy.
- Competent courts and other authorities according to applicable laws as well as third parties where we deem that disclosing your personal data is necessary to protect your vital interests or those of any other person, or for compliance with laws or regulations, or to protect, defend or secure our legal rights, including when we enforce or apply

agreements between you and us, or to counter the potential misuse of our services, or to secure the rights, assets or security of us, our users or third parties.

- Any other person – but only with your separate consent.

We process your personal data in secure locations and servers mostly within the European Economic Area. Your personal data may be transferred to countries outside the European Union or the European Economic Area only where the European Commission has held that the country in question ensures an adequate level of protection for personal data (including transfers to the United States covered by the [EU-US Data Privacy Framework](#)), or where we have taken appropriate safeguards to require that your personal data remains protected in accordance with applicable data protection laws, such as by implementing the [Standard Contractual Clauses](#) adopted by the European Commission for international transfers of personal data and carrying out a further risk assessment on those transfers, where necessary. You may contact us for more information on the safeguards in place in specific circumstances. In individual cases, international transfers of personal data may also take place based on (i) your separate and explicit consent, (ii) the performance of a contract between you and us or the implementation of pre-contractual measures taken at your request, or (iii) other applicable grounds for transfer under applicable data protection laws.

5.1. Data Recipients Addendum

We aim to provide you precise details on all recipients. particularly when they have a significant role in the processing of your personal data. However, all possible recipients cannot be identified due to, e.g., the temporary, irregular, highly limited or possibly non-existent, confidential or legal nature of their processing activities.

Recipient	Description	Processor/Controller
Microsoft services	Provider for emailing, calendar, communication, file storage, and other similar services.	Processor
Visma Solutions Oy	Contact information, financial details ie. invoicing, contract details, taxation.	Processor
WordPress	Website services, application forms, contact information.	Processor

6. How we retain your data

We keep your personal data only as long as we have a legitimate commercial reason to retain it for the purposes described above, or a purpose compatible with one. You may contact us

for more information on the more detailed principles applied in your specific circumstances. To determine the appropriate retention period, we consider and evaluate the scope, nature and sensitivity of the personal data we process, the potential risk of harm or damage from unauthorized use or disclosure, the purposes for which we process the data and the relevant legal requirements. We will also regularly assess the data we keep, and where we deem retention unnecessary, we will either erase or anonymize the data or, if this is not possible – for example, in case of information stored in backup archives – we will store the data securely and block any further processing until deletion is possible.

7. How we secure your data

To protect your personal data, we use appropriate technical and organizational measures designed to provide a level of security appropriate to the risk of processing. Those measures include, inter alia, as appropriate, the encryption of personal data, procedures which ensure the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services and the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident and procedures by which the effectiveness of technical and organizational measures are regularly tested, assessed and evaluated to ensure the security of the processing. In assessing the appropriate level of security, we take into account the risks presented by the processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data transmitted, stored or otherwise processed.

We also strive to ensure that any natural person acting under our authority who has access to personal data does not process them except on instructions from us. We will ensure that only such employees and employees of a service provider providing services to us have access to personal data who, due to the nature of their work tasks, need that access.

8. Your rights as a data subject

Unless otherwise explained in this section, you may invoke the following rights by contacting us as detailed in this privacy policy.

8.1. Rights of access, rectification and erasure

You have the right to obtain from us confirmation as to whether personal data concerning you is being processed by us, and where that is the case, access to that personal data. You may need to prove your identity in order to use this right. Your right of access may, however, be restricted on the basis of legislation, the privacy interests of other persons and/or the protection of trade secrets or intellectual property. Considering the purposes of the processing, we will also rectify, complete or erase inaccurate, incomplete or outdated personal data upon your request.

8.2. Data portability

If you wish, you may obtain the personal data which you have provided to us and which is being processed automatically on the basis of consent or contract, in a structured, commonly used, and machine-readable format. However, please note that generally, your data is not processed based on consent or contract.

8.3. Right to object and right to restrict

You may object, on grounds relating to your situation, to the processing of personal data concerning you that is based on legitimate interest by contacting us as detailed above. Where you object to our processing, you have the right to request that the processing in question be restricted for the period during which we evaluate the basis you have presented for your request. The processing may also be restricted, inter alia, when you contest the accuracy of your personal data. In that situation, the processing will be restricted for the time during which we can ensure the accuracy of the personal data.

8.4. Withdrawal of consent

You may withdraw your consent for the processing of personal data at any time by contacting us, or in some cases by another manner offered to you (often as instructed in the same context where we have obtained your consent). Please note that your data is processed based on consent only exceptionally.

8.5. Right to lodge a complaint

If you consider our processing of your personal data to be inconsistent with data protection laws, you may lodge a complaint with the competent supervisory authority <http://www.tietosuoja.fi>.

9. Changes to this Privacy Policy

We may update this notice from time to time in response to changing legal, technical, or business developments. When we update this notice, we will strive to inform you in a manner consistent with the significance of the changes we make.