# Processing of (personal) data by the entity in charge of the online application process (v202504)

#### 1. General information

This data privacy statement, which refers exclusively to data collected as part of the online application process, is to inform you about how your personal data that is collected as part of the online application process is handled at our end.

#### 2. The controller under data protection law

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## 3. Contact person for data processing maters

Elena Bazhenova Visual Components Oy Hatsinanpuisto 8, 02600 Espoo, FINLAND careers@visualcomponents.com

# 4. Personal data collected as part of the application process

Personal data means any information concerning the personal or material circumstances of an identified or identifiable individual. This includes information such as, for example, your name, address, telephone number and date of birth, but also data relating to your specific career etc. by reference to which a specific individual can be identified with reasonable effort.

The source of information saved in your register is primarily you as a job applicant. Other sources of information are used within the limits of the applicable regulations. We may use recruitment consultants if needed

Should you include in your job application an URL or other access information about your LinkedIn or other social media profiles used for professional purposes you consent that we may collect information from such profiles to the extent that collecting data is necessary and related to your job performance taking into consideration the nature of the open position.

# 5. Fundamentals and purposes of processing personal data collected from application documents and during the application process

If you apply to us electronically, i.e., via e-mail or using our online form, we will collect and process your personal data for the purpose of executing the application process and preparing contracts. We process the following personal data in connection with the job applicant register:

- basic information such as first name, date of birth, language, username and other identifiers, password;
- contact details such as private email address, private phone number, home address:
- information regarding the position you apply for such as information of the nature and type of the employment and information of the contact persons designated for the application process, salary request, information of the beginning of the job. More specific details appear in the job search advertisement;
- important information regarding your suitability that you have provided us in connection with the recruitment process and other information of yourself and of your background, such as photographs, information regarding study and education, occupation, information regarding work history (such as employers, starting dates and durations of employment and nature of the duties), language skills, other special skills and competence, description of



personal features, different kinds of certificates and evaluations and references to the portfolios, profiles in social media and other sources on the Internet and references [and information from any personality and aptitude assessments performed based on your consent];

- information regarding the proceeding of the recruitment process such as information of agreed interviews or the interruption of the recruitment process;
- other possible information that you have provided us voluntarily in connection with the recruitment process;
- information you have published for professional purposes in social media such as a LinkedIn profile or information we have separately collected based on your consent.

Providing your data is a requirement for us to be able to move forward in the application process. The basis for processing is your consent which you give us by applying.

### 6. Retention and protective measures

Only authorized HR staff and staff involved in the application process have access to your data. Each user has a personal username and password to the system. The persons processing data are bound by professional secrecy.

The data will be collected, stored and processed in the systems of a processer identified in the section 7 and the security measures enforced by the processor are described in its policy linked in section 7.

The personal data is stored for the purpose of filling the vacancy for which you have applied or processing your open application. Your data will be stored only for as long as it is necessary due to the purpose it was collected.

The personal data is stored for the purpose of filling the vacancy for which you have applied or processing your open application. Your data will be stored only for as long as it is necessary due to the purpose it was collected. We may store it up to two (2) years after the application process has been concluded for the purpose of fulfilling legal requirements and for facilitating defending ourselves against any claims arising from legal provisions. After this period, we will delete or anonymize your data. In case of anonymization, the data will only be available to us in the form of so-called metadata, without any direct personal reference, for statistical analysis (for example, share of male and/or female applicants, number of applications per specified period of time etc.).

The personal data from open applications and targeted applications, that we consider potential for other vacancies becoming open, we will store in our Talent Pool application for one (1) year after the submitting an open application or after the application process has been concluded for targeted applications in order to connect them with any other vacancies that may be of interest to you. This includes. example, applications apprenticeships or internships. Should you not be interested in this option, you may decline the storing and processing of your application and data in our Talent Pool by sending a message careers@visualcomponents.com.

Should you be offered and accept a position with us, we will store your personal data collected as part of the application process for at least the duration of your employment and the privacy policy applicable to our employees' personal data will apply.

We evaluate the need to store personal data regularly considering the applicable legislation. In addition, we take care of such reasonable measures which ensure that no incompatible, outdated or inaccurate personal data, taking into account the purpose of the processing, is stored in the register. We correct or erase such data without delay

## 7. Disclosure of data to third parties



Data transmitted as part of your application will be transferred using TLS encryption and stored in a database. This database is operated by Personio GmbH, which offers a human resource and applicant management software solution. Their privacy policy is set forth in <a href="https://www.personio.com/legal-notice/">https://www.personio.com/legal-notice/</a>. In this context, Personio is our processor under article 28 of the GDPR. In this case, the processing is based on an agreement for the processing of orders between us as the controller and Personio.

We may transfer personal data outside of the EU/EEA to our branch office. When personal data is processed outside the EU/EEA, we make sure that the importer of data has committed to use the EU Commission's standard contractual clauses.

## 8. Rights of data subjects

If we as the controller process personal data, you as the data subject have certain rights under Chapter III of the EU General Data Protection Regulation (GDPR), depending on the legal basis and the purpose of the processing, in particular the right of access (article 15 of the GDPR) and the rights to rectification (article 16 of the GDPR), erasure (article 17 of the GDPR), restriction of processing (article 18 of the GDPR), and data portability (article 20 of the GDPR), as well as the right to object (article 21 of the GDPR). If the personal data is processed with your consent, you have the right to withdraw this consent under article 7 III of the GDPR.

To assert your rights as a data subject in relation to the data processed during this online application process, please refer to our Contact person for data processing maters (see item 3).

#### 9. Concluding provisions

We reserve the right to adjust this data privacy statement at any point in time to ensure that it is in line with the current legal requirements at all times, or in order to accommodate changes in the application process or other processes. In this case, the new data privacy statement applies to any later

visits of this recruitment website or any later job applications.

In addition to this data privacy statement, please view our general data privacy statement at <a href="https://www.visualcomponents.com/wordpress/wp-content/uploads/2025/04/Data-Protection-Policy-v20250401.pdf">https://www.visualcomponents.com/wordpress/wp-content/uploads/2025/04/Data-Protection-Policy-v20250401.pdf</a>

