

RECRUITMENT REGISTER DESCRIPTION

Register controller	Enfo Oyj (on its on behalf and on behalf of Enfo Group Companies *)
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Register name	Enfo Recruitment Register

* Enfo Oyj maintains Enfo Recruitment Register for Enfo Oyj and all Enfo Group companies by virtue of separate agreements (including data protection agreement(s)).

Personal data is collected, processed, accessed, transmitted and/or stored within the service.

~~personal data~~ means any information relating to an identified or identifiable natural person (~~data subject~~); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; i.e. any data that can be linked to an identified or identifiable natural person (names, addresses, orders, actions, web behavior, etc).

1. Which personal registers are within the scope of the service and who is the register controller and who is the processor?

Register	Organization	Role (controller/processor/3rd party)
User register	Enfo	Controller
	Enfo	Processor
	Talentadore	Processor
	Emine	Processor

~~processing~~ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

~~processor~~ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

~~controller~~ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

~~third party~~ means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data

Note: Also, a possible access to personal data matters. As an example, a datacenter provider is a processor of personal data if the datacenter-providers admins have a possibility to access personal data stored by its customers.

2. What personal data is collected, processed, accessed, transmitted and/or stored within the service?

The register consists of one database. Data is collected with an electronic application form, in which the job applicant is asked for:

- Contact details (names, e-mail address and telephone number information)
- The CV and application letter: these are handled confidentially and they can only be used by those people who need the information in their work. Applicant information is not handed over outside the recruitment process. In the archiving and destroying of data, the provisions and directives that are in effect at any given time are followed and unnecessary or outdated data is not stored
- The applicant's own links, for example to a portfolio or Internet profile.
- The evaluations and notes of the recruiter about the applicant

The recruiter can also enter the details of the applicant themselves into the register on the applicant's request.

Then service and database are located in Frankfurt. Encrypted back-up copies are stored in Helsinki. Enfo makes the storage of applicant data possible for a minimum of 6 months and a maximum of 36 months. The back-up copy has an 8-week rotation, meaning that personal data is removed from back-up copies 8 weeks after the date of expiry.

Description of the personal data

3. Who has access to the personal data?

User type/role possessor	Access ó admin or common user
Head of HR	Managed locally - Admin
Recruitment officers	Managed locally ó Read-Write
Recruitment Partner	Managed locally - Admin
Recruiting Manager	Managed locally ó Read-Write
Job applicant	Managed locally ó Read-Write only own data

4. Which data sources are used?

Users are manually imported / created.

From whom is the personal data received/collected; the subjects themselves, other sources?

5. Which of below mentioned (sensitive) data is processed/transmitted/stored within the service (or available for the service)?

Common personal attributes.

a. *Common personal attributes*

- b. *Personal data that belong to children*
- c. *Health-related data*
- d. *Political opinions, race, etc.*
- e. *Credentials or other type of access to sensitive/highly sensitive data*

6. What is the foundation for lawfulness?

The data subject has given consent to the processing of his or her personal data for one or more specific purposes.

Processing shall be lawful only if and to the extent that at least one of the following applies:

- a. *the data subject has given consent to the processing of his or her personal data for one or more specific purposes;*
- b. *processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract;*
- c. *processing is necessary for compliance with a legal obligation to which the controller is subject;*
- d. *processing is necessary to protect the vital interests of the data subject or of another natural person;*
- e. *processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;*
- f. *processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.*

7. What is the lifecycle of the stored personal data?

c. Fixed time : Personal data will be stored for a maximum of 12 months. The job applicant has the right to be forgotten about or correct erroneous information within the scope of the storage time. Enfo reserves the right to store personal data for 8 weeks after the date of expiry in a back-up copy.

- a. *Until further notice,*
- b. *Indefinitely,*
- c. *Fixed time,*
- d. *?*

8. Personal Data handling & transportation

As a rule, data is not handed over to outside parties from the register and it is not used for direct marketing. Registered job applicants can have their data removed from the register when they want. The data cannot be passed on outside the EU or EEA areas.

9. Fulfillment of GDPR principle and subjects rights a register controller

How is Enfo's personal data protection policy fulfilled within the service?

Applicable measures are implemented.

10. Which security measures are used to ensure the integrity and security of personal data?



Enfo Security policy applicable executed.