



## Recruitment Privacy Statement

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### 1. General

Oy Karl Fazer Ab and its affiliates are committed to protecting your privacy and processing your personal data in accordance with applicable data protection legislation and good data protection practices. In this Privacy Statement "Fazer" refers to the operative company that you are applying to have a role in, which acts as the controller of your personal data jointly with Oy Karl Fazer Ab.

This Privacy Statement describes how personal data concerning you is collected, processed and protected during Fazer's recruitment activities. Fazer is always processing personal data according to the local laws and taking into consideration the business specific differences.



“Personal data” means any information relating to an identified or identifiable person.

“Sensitive data” refers to any information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. In addition, genetic data and biometric data for the purpose of uniquely identifying a person as well as data concerning health, sex life or sexual orientation and social security number are considered as sensitive data.

“Processing” refers to any operation which is performed on personal data using manual or automatic processing, for example collecting, storing, organizing and deleting of data.

“Controller” refers to the body who alone or jointly with others determines the purposes and uses for the processing of personal data. i.e. decides how your personal data is processed.

## **2. From where is the data collected?**

Fazer collects personal data directly from you. In addition, data is collected from third party sources to the extent permitted by applicable legislation, or based on your consent, when it is necessary for assessing your suitability for the position you are applying for.

Fazer can collect personal data from parties, such as

- recruitment agencies
- social media that you use for professional purposes (e.g. LinkedIn)
- reference contacts you have provided
- authorities in connection with the background checks
- personality or aptitude assessment providers
- Job centers
- Consultant companies

## **3. What kind of data is collected?**

Fazer collects only personal data that is necessary for the recruitment purposes. For example, the following information can be collected:

- Personal data you submit via online application system in online form, CVs, applications, or other written materials such as name, email, phone number, address, gender, date of birth, personal webpage, photo, current employer, title, education, completed studies, date of graduation, work



experience, language skills, IT-skills, certifications, civil status, children, possible starting date, salary request and documents certifying work permit.

The personal data can be combined, as applicable, with personal data from other sources, such as information derived from

- the interviews or other communications with you
- social media for professional purposes (e.g. LinkedIn)
- your references
- background checks
- personality and aptitude assessments

#### **4. What is the data used for?**

Processing of your personal data is necessary for assessing your suitability for the role for which you are applying for. Fazer can also assess your suitability for the future roles that may become available. Fazer processes personal data also to inform you about open positions, perform administrative functions and to analyse applicant pool in order to understand who is applying to the positions and how to develop the recruitment process.

The processing of personal data for the abovementioned recruitment purposes is primarily based on Fazer's legitimate interests. Legitimate interest refers to an interest that is lawful and important to Fazer such as to receive and process applications and corresponding data. In processing activities based on legitimate interest applicant's rights are taken into account and their privacy is not interfered more than necessary. The applicant has, on grounds relating to his or her particular situation, the right to object to processing based on a legitimate interest. Read more about rights in section "How can you influence the processing of your data?".

When processing is based on your consent, you have always right to withdraw your consent at any time (see contact details in section 11). Withdrawal of consent does not affect the lawfulness of processing based on consent before the withdrawal.

Fazer needs to process applicant's personal data as it is necessary in order to take steps prior to entering into a contract. Please notice that failure to provide necessary information may disqualify you from employment, internship or from participation in certain company plans and programs or prevent Fazer from entering into other contractual relationship with you.



## 5. For how long is the data stored?

If Fazer chooses to employ you, Fazer retains the necessary personal data for the length of your employment and as required by applicable laws. During employment relationship, your personal data will be processed according to the Fazer Employee Privacy Statement.

If Fazer does not employ you, your personal data will be deleted 6 months after the recruitment process. Background checks as well as personality and aptitude assessments will be deleted immediately.

If you want to be considered for other open positions in the future, your personal data will be stored for 6 months.

## 6. Who can process your data and is it disclosed to third parties?

Your personal data is processed only by those employees who are evaluating your application for employment or who need to process the data when performing support functions to recruiting. These include for example, recruiters, hiring managers and other interviewers and individuals performing administrative and IT support functions. Your personal data is processed within the Fazer Group.

- **Service providers** Fazer uses different service providers to process your data. When the processing is outsourced to service providers, they can only use your personal data following the instructions defined by Fazer. Service providers are, for example, companies providing recruitment or HR information systems for Fazer. In such cases it is ensured by appropriate contractual means that the service providers maintain a level of information security that is adequate to protect your personal data and to comply with the applicable data protection legislation. The service providers and subcontractors process your personal data only for the above-mentioned purposes determined by Fazer.
- **Legal obligation:** Your data may be disclosed to the authorities if the law requires Fazer to do so. Fazer can disclose your personal data also, when it is necessary for the establishment, exercise or defence of a legal claim. In such situations Fazer does not disclose more data than it is necessary.
- **Mergers and acquisitions:** Your personal data can be disclosed during the possible acquisition or merger to the purchaser or to other party relevant to the arrangement.



## 7. Is your data transferred beyond the borders of the EU or EEA?

Your personal data is not principally transferred outside the European Union/European Economic Area. Only in exceptional cases, when it is necessary for making the recruitment decision on the position you are applying for, your personal data can be transferred within the Fazer Group to a country located outside the EU/EEA. This may come in question, for example, when the hiring manager of the position is located within a Russian entity of the Fazer Group. Your personal data is only transferred outside the EU/EEA, given that the requirements of the General Data Protection Regulation are fulfilled. In this case the processing is organized by the data protection clauses approved by the European Commission. You may request information on the details of transfers to third countries and safeguards by using the contact details in the end of this document.

## 8. How can you influence the processing of your personal data?

- You have the right to request access to the data concerning you or to receive confirmation that your personal data is not processed (*right of access*).
- You have the right to rectification (*right to rectification*). It means that if there are errors in the data concerning you, or if the data is inaccurate or deficient, you have the right to ask Fazer to rectify or complete the data.
- You have the right to have your personal data erased in certain situations, for example, when the processing of your personal data is no longer necessary for the purposes for which it was collected, or if the processing is based on your consent and you want to withdraw your consent and there are no other bases for processing (*right to be forgotten*). Please note that Fazer may have a basis to retain the data, for example to be able to defend itself against legal claims. In such cases data cannot be erased.
- You have the right, on grounds relating to your particular situation, to object to processing based on legitimate interest (*right to object*).
- In certain situations, you might have the right to restrict the processing of your personal data (*right to restriction of processing*). When the processing has been restricted, your personal data will only be stored and not processed otherwise. For example, if you contest the accuracy



of your personal data, you have the right to have the contested data under a restriction of processing during the time when it is ensured that your data is accurate.

- In certain situations, you have the right to obtain the personal data you have provided to Fazer in a machine-readable format so that you can transfer it to another controller (*right to data portability*).

You can exercise your data protection rights by sending a request form via Fazer Group privacy page (<http://www.fazergroup.com/privacy-at-fazer/employees-and-applicants/>).

If you believe that Fazer, despite the principles set out in this Recruitment Privacy Statement, has infringed upon your rights according to applicable data protection law, you have a right to lodge a complaint with the local data protection authority.

Datatilsynet  
Borgergade 285  
1300 København  
Telefon 319  
E-mail [dt@remove-this.datatilsynet.dk](mailto:dt@remove-this.datatilsynet.dk)

## **9. How is your personal data protected?**

Fazer has appropriate technical and organizational security measures and processes to secure the personal data from loss, misuse or other similar unauthorized access to your data.

The data is collected to servers and databases that are protected by firewalls, passwords and other technical means. The servers, databases and their backup copies are located in secured premises where the data can only be accessed by specific persons designated in advance. The servers have strong security.

## **10. Can Fazer change the Privacy Statement and how can you see the updates?**

Fazer continuously develops its practices and services relating to the protection of personal data and, therefore, this Recruitment Privacy Statement is updated to describe the processing when necessary. Changes in the applicable legislation or interpretations thereof may also result in amendments to this Recruitment Privacy Statement.



Up to date Recruitment Privacy Statement can always be found in Fazer Group privacy website (<http://www.fazergroup.com/privacy-at-fazer/employees-and-applicants/>)

When necessary, the updates for the Privacy Statement are communicated directly to you.

## **11. Who can you turn to if you have questions concerning the processing of your data?**

If you have any questions about the processing of personal data, please contact

[employmentprivacy.fdk@fazer.com](mailto:employmentprivacy.fdk@fazer.com)

## **12. Controllers**

The controller of your personal data during the recruitment phase is the Fazer entity you are applying to have a role in, jointly with Oy Karl Fazer Ab.

### **Fazer Group**

Oy Karl Fazer Ab  
Fazerintie 6, 01230 Vantaa  
PL 4, 00941 Helsinki

### **Denmark**

Fazer Food Services A/S  
Skibhusvej 52 A, 1.  
5000 Odense C

## **13. Links to other privacy statements**

You can find more information about how privacy is managed at Fazer on Fazer Group privacy pages ([www.fazergroup.com/privacy](http://www.fazergroup.com/privacy))