

SENSIBLE 4 PRIVACY POLICY AND STATEMENT

1. Who We Are

Sensible 4 (the “Company”, “We” or “Us”) is the Finnish limited Liability Company with business ID 2813696-2 and domicile in Espoo, Finland.

We act as “Controllers” of your personal information you provide in and with your job application.

2. You Privacy

We are committed to protecting and respecting the privacy of the users of this website (the “Website”). This privacy policy explains how we collect, store, use and otherwise process any personal data that we collect from you, or that you provide to us.

If you use Sensible 4’s online career resources, we collect and process your personal data for recruitment-related purposes.

By sending us your job application you agree to Sensible 4 Data Privacy Statement explained below.

We want to make sure that you understand and agree to how we process your application for the vacant position and for the hiring process (including open application).

3. What information We collect from You

The types of information requested from you and the manner in which that information is collected and accessed are determined by the requirement regulation of the country in which the position is located, and not the country in which you reside.

We will collect the following personal data depending on job description, but not limited to:

- Name, address, email, telephone number;
- CV, cover letters, other submitted by you documentation;
- Information about your interactions and interview generated by recruitment specialists or basic Internet searches;
- Recommendations provided on your behalf by third parties;
- Documentation required under immigration and labour laws;
- Data about your prior employment, education, and where applicable, credit history, criminal records or other data revealed during background screenings;
- Data about your health or disability where it is relevant to your ability or availability to work or to a workplace accommodation, subject to legal limits on the timing of collection of such data and other applicable limitations;
- Your personal answers to application questions, when applicable;
- If you contact us in writing, via email, or over the phone, we may keep a record of that communication;
- Any other information you wish to provide in support of your application

You are not required to provide any requested information to Sensible 4, but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.

By submitting your application and relevant information, you acknowledge that all information provided by you is true, complete, correct and not misleading to the best of your knowledge and belief, and that you allow us to use your personal data for assessment of your suitability for employment with us and for our recruitment statistics and monitoring.

Providing any inaccurate or incomplete information may make you ineligible for employment with Sensible 4.

4. Why do we collect this information and who will have access to it

Legal Basis for collecting your personal data:

We need to ensure that we have proper communication with you and within the company in relation to your recruitment process, and ensure that we hire the most suitable candidate for the job

Purposes for which we may use your personal data and who may have access to it:

- Will be used by hiring managers and other interviewers to consider and manage your application and assess your suitability for the applied position and future positions that may become available;
- Will be used to contact any referees that you identified (providing us with contact details, you confirm their consent to be contacted for referral and our right to contact them);
- Will be available to us and our processors (such as payroll company, recruiters, IT and administrative functions, background screening companies)
- Will be used for communication with you regarding the vacancy
- Will be used by a third party in connection with any proposed or actual reorganisation, merger, sale, joint venture, investment, assignment, transfer or other disposition of all or any portion of Sensible 4 business, assets, shares (including in connection with any bankruptcy or similar proceedings) or an actual client in relation to a project, where you may be involved in performance as a company employee, or a government officials;
- Will be used to satisfy legal requirements
- Will be used for statistical analysis or to extract it as part of a successful employee process in to our HR/Payroll system

Sensible 4 will not use your personal data for purposes that are incompatible with the purposes listed in this Privacy Statement, unless it is required or authorized by law, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

When required in relation to your employment, Sensible 4 may securely share your personal data with third parties (service providers, public authorities). Any service providers and professional advisors to whom your personal data may be disclosed, are expected and required to protect the confidentiality and security of your personal data and may only use your personal data in compliance with applicable laws.

5. Where we can obtain your personal data:

- From you, when you submit your application via our website;
- From conversations with recruiters and interviews with hiring managers and other Sensible 4 personnel or representatives, some of which may be recorded as well as from Internet searches that these individuals may perform, or data that they may obtain from job search or professional networking websites (e.g. monster.com, LinkedIn, etc.) where you may have made data about yourself publicly available;
- From previous employers;
- From background checks, as applicable. Where permitted by law, Sensible 4 may contract with a third party to perform a pre-employment background screening. The content of background check information varies by country to comply with local requirements, but may include information gathered from publicly available sources, your former employers or colleagues, schools you have attended, credit reporting agencies, and criminal records databases. You will receive more information about the nature of such a background check before it begins. Where required by applicable local law, you may be asked to provide certain background check information, (which may include sensitive data) directly to Sensible 4.

6. Where We store your information

All information you provide to us is stored on our secure servers.

We also may keep written or audio records of our communication with you.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

7. How long We store your personal data

If you are receive and accept an offer of employment by Sensible 4, personal data collected during your pre-employment period will become part of your Sensible 4 personnel records, to be retained throughout and for a period after your employment with Sensible 4.

If Sensible 4 does not employ you, Sensible 4 may nevertheless continue to retain and use personal data collected during the recruitment process in order to consider you for new positions, and, if appropriate, to refer back to an earlier application if you submit a resume or other information to Sensible 4 again in the future.

Sensible 4 determines the retention period of your information based on the following retention criteria:

- Sensible 4 retains your personal data as long as it has an ongoing relationship with you;
- Sensible 4 retains your personal data where it is required to do so by a legal obligation to which it is subject;
- Sensible 4 retains your personal data where this is advisable to safeguard or improve Sensible 4's legal position (for instance in relation to statutes of limitations, litigation, or regulatory investigations).

8. *How Sensible 4 protects your personal data*

Sensible 4 employs organisational, technical, and physical security measures in order to protect your data from loss or misuse. Where we contract with third-party suppliers to provide services that may enable them to access your personal data we require them by contract to have similar security controls in place.

9. *Your rights in relation to your personal data provided to us:*

- the right to be forgotten and erase your data;
- the right to correct or update, if information is inaccurate or out of date;
- the right to obtain and reuse your personal data provided to us;
- the right to object to the controller and processors handling of your personal data
- the right to withdraw your application and consent with regards to the handling of your personal data
- you have the right to ask for a copy of the information we hold about you
- You have the right to submit a complaint with a supervisory authority - Finnish Data Protection Ombudsman

10. *How you can access the information Sensible 4 has about You or Exercise Your rights*

We are dedicated to providing reasonable access to visitors who wish to review the personal information retained when they apply via our website site and correct any inaccuracies it may contain. To do this, you need to send personal request. In all cases we will treat requests to access information or change information in accordance with applicable legal requirements.

You can send your personal request via email: info@sensible4.fi

Where you exercise your right to object or withdraw your consent we may process your personal data without your knowledge or consent where we are permitted or required by law or regulatory requirements to do so. In such a case, we will not process more personal data than is required under the circumstances.

If you are not satisfied by our actions, you can seek recourse through our internal complaints procedure. If you remain dissatisfied, you have the right to refer the matter to the supervisory authority or seek recourse through the courts.

11. *IP addresses and cookies*

Our Website uses small data files known as cookies ("Cookies") to collect information about the people that use our Website. When you use the Website, Cookies are transferred to and stored on your computer's hard drive. They collect personal information about you to enable us to identify returning applicants only. This means we can provide you with a more personalised application process.

You can reject these Cookies by changing the setting on your website browser but you should be aware this may impair the functionality of the Website. Aside from the Cookies to identify applicants returning to the Website, we will not use any other Cookies.

12. *Changes to our privacy policy*

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you on the e-mail you provide.

13. *Equal Opportunities*

We are an equal opportunities employer and we comply with applicable Finnish legislation on equality and non-discrimination.

You may be required to provide evidence of your eligibility to work in Finland and we may ask you to provide further documentation in order to comply with any statutory obligations on us relating to such matters.

Where we ask you for information relating to your sex, ethnic origin and culture, this information is used by us solely for our monitoring of the effectiveness of our equal opportunities policy.