# Privacy statement for Heltti Oy's recruitment services



Updated 25 June 2025

With this privacy policy, we provide information about the processing of personal data of Heltti's job applicants, as well as other individuals to be recruited and those participating in recruitment events.

## 1. Data Controller

Heltti Oy (Business ID 2544593-8) Mannerheimintie 12 A, 00100 Helsinki

## 2. Contact information

Data Protection Officer Juulia Kaipiainen privacy@heltti.fi

Heltti Oy / Data Protection Officer Mannerheimintie 12 A, 00100 Helsinki

# 3. Purposes and Legal Basis for Processing Personal Data

Personal data is processed for the following purposes and on the following legal bases:

- Handling and managing recruitment processes
- Communication and contact
- Preparation of an employment or independent contractor agreement and entering into an agreement
- Organizing recruitment and training events, managing event invitations and event participation information
- Conducting suitability assessments
- Conducting security clearances
- Checking credit information
- Processing of a drug test certificate
- Investigating and correcting an error situation that has occurred in an IT service (e.g. online service, application) or device

 Ensuring the legal protection of Heltti and the data subject, fulfilling obligations based on regulations and official instructions, verifying potential abuses and monitoring use



 Reporting and analytics, as well as collecting statistical data on recruitment processes

Depending on the purpose of the processing and/or the personal data, the basis for the processing of personal data is the person's consent, an agreement between the person and Heltti or the preparation thereof, the implementation of rights and obligations arising from legislation or a legitimate interest.

# 4. Categories of Personal Data Processed

Heltti may process the following categories of personal data:

- Name, date of birth and nationality
- Contact information (e.g. address, email address, phone number)
- Personal identity number
- Work and education history and degree information
- · Qualifications, specializations, information on professional rights
- Licenses, competence tests
- Language skills
- Salary request
- Video interview responses recorded by the applicant
- Suitability assessment data
- Referee's contact information, as well as possible letter of recommendation and other information received from referees
- Other information provided by the application, as well as application attachments (e.g. CV, cover letter, study records, LinkedIn profile information, information on the applicant's current employer's public pages, etc.)
- Notes from interviews
- Security clearance information
- Credit information
- Information of a drug test certificate
- Communication with Heltti
- Responses to surveys and queries
- Event invitation and participation information (incl. possible dietary restrictions)
- Web and communication behavior data and log data:
  - Online behavior and use of services are monitored by, for example, IP address and cookies. Collected data may include, e.g., the page you browsed, the form you filled out, the model of the device you used, the channel used such as an application, mobile browser or internet browser, the browser version, session identifier, time and duration of the session.
  - With regard to the monitoring of communication behavior; the collected information may include, for example, the opening of email messages sent by us, clicking or accessing our site through a message.
  - Log data related to the use of applications and online services.

## 5. Storage Time of Personal Data

Heltti only stores personal data for as long as the data can be considered necessary for the purposes defined in this privacy policy and there are legal grounds for processing. Storage time is also affected by legal obligations concerning storing of personal data as well as other limits for different legal actions, such as the period of filing a suit or expiration of time limit for the right to institute criminal proceedings.



When you have applied for a specific open position, Heltti may store your personal data, such as factors influencing the recruitment decision, e.g. CV, for a period of two (2) years to defend a legal claim as prescribed by law.

When you send an open application to Heltti through the application system, Heltti will retain you job application and personal data in the recruitment system for a period of twelve (12) months from the date of submission of the application. After this, the application is securely destroyed. We do not process any applications received by email and such applications are destroyed immediately.

The applicant has the right to request the deletion of their data at any time.

Data that has become obsolete or unnecessary for its purposes, or for which there is no longer a legal basis for processing, will be anonymized or securely destroyed.

## 6. Data Sources

Personal data is primarily collected from the data subject. If data is obtained during the recruitment process from a source other than the data subject themselves (e.g. referees, credit checks, a criminal record extract, a limited security clearance), a separate consent will be requested from the data subject. However, the data subject-s application or data request may not be processed without processing personal data.

If a potential future employee or independent contractor has consented thereto, personal data may be stored in Heltti's recruitment register. The data subject's information provided in connection with the application submission may be stored in Heltti's recruitment register if the recruitment process continues with the candidate now or in the future.

For recruitment purposes, data may also be obtained from public sources, such as information regarding professional qualifications from the registers of social welfare and health care professionals as well as from Heltti's partners (e.g. healthcare student organizations).

Online behavior and the use of applications and services are monitored on the basis of activities on Heltti's website, applications and services.

Communication behavior is also monitored based on responses to Heltti's messages.

## 7. Processing and Disclosure of Personal Data



The processing of personal data may be outsourced to external service providers who process personal data on behalf of Heltti, but always in accordance with data protection legislation and within the limits it sets.

Personal data is not primarily processed outside the EU/EEA. In case of transferring the data outside the EU/EEA, the transfer is carried out using the European Commission's standard contractual clauses or other transfer mechanisms permitted by data protection legislation.

The processing of personal data does not involve automated decision-making. The recruitment process may include the automated assessment of personal characteristics, for example as part of the applicant's suitability assessment.

## 8. Principles of Personal Data Protection

Heltti takes appropriate physical, technical, and organizational measures to protect personal data from misuse. Any manual material is stored in a locked location that is only accessible to separately authorized personnel.

Heltti carefully selects its subcontractors and ensures through contracts and other arrangements that data is also processed by subcontractors in accordance with legislation, Heltti's instructions, and good data protection practices.

# 9. Data Subject's Right

#### **Right of Access**

The data subject has the right to know whether their personal data is being processed and to inspect the data concerning them. The data subject may also make a request to inspect their personal data.

## **Right to Rectification and Erasure**

The data subject has the right to request the rectification of inaccurate and incomplete data. Heltti must also rectify inaccurate or incomplete data on its own initiative without undue delay.

The data subject also has the right to request the erasure of their personal data. The erasure request is implemented in accordance with applicable law.

#### Right to Object to or Restrict Processing

In certain situations, the data subject has the right to object to the processing of their personal data on grounds relating to their particular situation.

The data subject also has the right to restrict the processing of personal data in certain situations, for example, when the data subject is awaiting Heltti's response to a request of rectification or erasure of their data. Heltti has the right to refuse the data subject's request if restricting the processing could cause a serious risk to the data subject's health or care, or to the rights of the data subject or another person.



## Right Not to Be Subject to an Automated Decision-Making

The data subject has the right not to be subject to a decision based solely on automated processing, such as profiling, which produces legal effects concerning them or significantly affects them in a similar way. There are exceptions to this prohibition.

#### Withdrawal of Consent

If the processing of personal data is based on consent, the data subject may withdraw their consent at any time. Consent can be withdrawn in the service based on consent in the manner instructed or by contacting HelttiLinja.

### Right to refer a Matter to a Supervisory Authority

The data subject has the right to refer a matter to the supervisory authority (in Finland, the Office of the Data Protection Ombudsman) if the data subject considers that the data controller has failed to comply with applicable data protection legislation. Instructions on how to file a complaint can be found on the website of the Office of the Data Protection Ombudsman: tietosuoja.fi.

Requests regarding the data subject's rights must be primarily made in writing at Heltti's office or in a digital service intended for customers through strong identification. The data subject's identity is verified in a reliable manner with each request. These measures ensure the confidentiality and appropriate handling of personal data.