

PRIVACY NOTICE FOR JOB APPLICANTS/CANDIDATES

1 SCOPE AND PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice applies to the current, and where applicable to the former, candidates and job applicants (later “candidate(s)”, “data subjects”, “you”) of the Neova Group (later “Neova”, “we”). It explains what personal information we collect or obtain in connection with a recruitment process, and how this information is used including disclosure, retention and protection of the data. It also explains the candidate’s rights to control the processing. The candidates are strongly recommended to read this Privacy Notice before submitting any personal information related to a recruitment process to Neova.

A recruitment process consists of the recruitment related activities including collecting job applications and finding suitable candidates. Neova is committed to respect the candidates’ privacy and processes the personal information related to a recruitment process according to the European Union’s General Data Protection Regulation (2016/679) (GDPR) and other applicable privacy laws and regulations.

Personal information is information that directly or indirectly reveals your identity, such as a name, identification number, address and educational data (later “personal data”). The definitions of the data privacy terms found in Article 4 of the GDPR apply for this Privacy Notice.

2 CONTACT INFORMATION, CONTROLLER

From data subject’s perspective, the local Neova Group company for whom the data subject applies for, works for or otherwise has the closest relationship with, is the data controller of the respective data subject’s personal data. All Neova Group companies are listed in the Attachment 1.

Personal data is controlled jointly by the local Neova Group company and Neova Oy.

In all data protection related matters, data subjects may contact Neova Group by using the following contact information.

Neova Oy

Business ID: 0174817-6
P.O. Box 22, Yrjönkatu 42
FI-40101 JYVÄSKYLÄ
Finland
Phone: +358 20 790 4000

Email: privacy@neova-group.com

Person in charge of Data Protection in Neova Group: Johan Nybergh, phone: +358 (0) 40 562 5565.

3 PURPOSE OF PROCESSING OF PERSONAL DATA

We process the personal data of the candidates for recruitment purposes, our legitimate Human Resources (HR) and business purposes:

- Identifying candidates for positions/roles (current and future) by searching for candidates or obtaining job applications
- Evaluating and selecting candidates for positions
- Communications between the parties (e.g. emails)
- Background checks: contacting references and security screening (as permitted by applicable law)
- Administration of the recruitment process (e.g. calendar invitations, transfer of data (see separate chapter on transfer of data))

In addition, personal data may be processed for

- Fulfilling security obligations (such as fraud prevention or investigation)

- Administration of consent (if needed) and requests to exercise rights under GDPR (e.g. see separate section on the rights of the data subjects/candidates)
- Protection of legal rights e.g. to be able to defend a claim or solve a dispute

NOTE! If a candidate is hired, the processing of the candidate's personal data is continued according to the Privacy Notice for employees.

Automated decision making including profiling

Neova may ask the candidate to participate in suitability tests performed by an external recruitment company. Participating in the tests is voluntary. The test results are used as a part of the primarily manual decision making for hiring candidates. The decision whether to hire a candidate or not is not solely based on the suitability test results, but all the written and oral information gathered during the recruitment process. We are not using automated decision making, including profiling.

4 LEGAL BASIS FOR PROCESSING OF THE PERSONAL DATA

The legal basis for processing of a candidate's personal data are the legitimate interests of Neova for recruiting new employees and offering open positions to the candidates, and the candidate's consent if necessary.

In addition, personal data is processed to fulfil legal obligations such as ensuring security/safety and protection of the legal rights of other parties involved.

If the candidate is selected for a position/role, the legal basis for the processing include the employment contract and its preparation.

4.1 Consent

Neova will ask for the candidates consent if the processing of personal data for a specific purpose requires consent according to the applicable privacy legislation.

4.1.1 Withdrawal of consent

The candidate can withdraw his/her consent to any further processing of his/her personal data at any time by contacting Neova (see Controller, contacts information in the beginning and rights of the data subjects/candidates later in this Privacy Notice).

5 THE PERSONAL DATA PROCESSED AND THE SOURCES

Sources of personal data

- The candidate is the main source of personal data. He/she provides personal data by participating in a recruitment process managed by Neova (e.g. submission of a job application, interviews, tests, communications)
- Neova can also receive personal data of the candidate from third parties, recruitment companies (independent controllers), that collect data from the different candidates by interviewing, testing and evaluating them. Thus, Neova receives personal data that the candidate has provided to the recruitment company
- Neova also receives personal data of the candidate from the references submitted by the candidate and the security screening agency (if a security screening is performed)

We only collect personal data relevant to the recruitment process. We collect the following categories of personal data:

Categories of personal data	Examples of personal data
Contact and identity information	Name, address, phone numbers, email address, date of birth

Professional and education data	CV, education and training, employment history, publications, professional skills, certificates
Other personal data submitted by the candidate	Other personal data than the afore mentioned and submitted by the candidate on request or on his/her own initiative
Suitability test data	Suitability test results
Evaluation data	Assessments of the candidate's suitability for a current or future position in Neova
Background check results	Security screening results and answers / comments from contacted references
Electronic identification data	Username and password to the Neova HR system

Candidates are not obliged to provide personal data to Neova but failing to provide information may result in termination of the candidate's recruitment process, or difficulties to evaluate the candidate properly.

6 RETENTION PERIODS

Neova retains the candidate's personal data as long as necessary for the purposes presented in this Privacy Notice, unless a longer retention time is required in the legislation.

If the candidate is hired, the personal data processed in the recruitment process will no longer be processed under this Privacy Notice, but according to the employee privacy notice and the retention periods outlined there.

When the personal data are no longer needed, the data are removed or rendered anonymous within a reasonable time. The length of the retention period depends on the purposes of the processing. Retention times are presented in the table below.

Categories of personal data	Retention time
<i>Personal data of candidates that have joined a recruitment process for a specific position(s):</i>	
Recruitment data in the HR system	24 months as a maximum after the termination of the recruitment period (the last update of the data) unless the candidate is hired where after the retention times are determined by the Privacy Notice for the employees
Security screening results	Maximum of 6 months
<i>Personal data of candidates that have submitted an open application:</i>	
Recruitment data in the HR system	6 months as a maximum after the last update made by the candidate unless the candidate joins a recruitment process for a specific position (see above)

The retention times of the personal data collected for information security purposes, such as electronic identification data or log data, may differ from the retention times described above. The retention times are IT system specific or defined in a general policy or procedure. More information can be obtained from the Controller if necessary.

In addition, if necessary, personal data needed for protecting the rights of those involved in the recruitment process or for fulfilling legal obligations are saved as long as permitted and needed for the purpose (e.g. defending a legal claim or solving a dispute).

7 DATA TRANSFERS AND RECIPIENTS

Neova transfers personal data within the companies of the group, if necessary, for the purposes presented in this Privacy Notice.

Neova transfers personal data to the recruitment companies from which Neova purchases recruitment related services such as suitability test services. The recruitment company acts as an independent controller of the personal data of the candidate that it receives from Neova and collects from the candidate when performing the

recruitment services. Neova will act as a receiver for the test results and other personal data that the recruitment company transfers to Neova.

Neova's IT service providers that have access to Neova's IT systems and equipment may process the personal data in those systems, if necessary, for performing the contracted services.

Neova may also, with the consent of the employee, transfer personal data to security intelligence authorities for security screening if permitted by applicable law.

Categories of recipients:

- Recruitment companies
- IT service providers
- Security screening agency (authorities)

More information on the recipients can be obtained from Neova.

Neova may also disclose personal data due to a legal obligation related to e.g. security, safety and protection of legal rights.

If Neova is involved in a merger, sale, joint venture, acquisition or similar arrangement, Neova may transfer personal data to the parties involved. Neova communicates any significant changes in the privacy to the candidates whose personal data is concerned.

7.1 Personal data transfer(s) outside EU/EEA

If personal data is transferred outside the European Union (EU) / the European Economic Area (EEA), we ensure that your personal data continues to be protected on an adequate level in accordance with the privacy legislation (e.g. European Commission's standard contractual clauses).

8 RIGHTS OF THE DATA SUBJECT/CANDIDATE

Data subjects (here candidates) have the rights stated in the GDPR to make the requests presented here.

8.1 Right to access and rectification

You have the right to request us to inform you what personal data we process concerning you (or that no data is processed) and request us to correct your personal data that are incorrect or incomplete (or outdated).

8.2 Right to erasure ('right to be forgotten') and right to restriction of processing

You have the right to request us to erase (or render anonymous) or restrict the processing of personal data concerning you that we process. We will comply with your request unless we have a legitimate ground not to delete the data, in which case you will be informed. After we have deleted your personal data, all backups might not be deleted immediately, but as soon as reasonably possible.

8.3 Right to object to processing

You have the right to object to the use of all or some of your personal data for selected purposes. We will comply with your request unless we have a legitimate ground to continue the processing (e.g. legal obligation), in which case you will be informed.

8.4 Right to data portability

You have the right to receive the personal data concerning you that you have provided in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller if the processing is based on consent or on a contract, and the processing is carried out by automated means.

8.5 Right to withdraw consent

If you have given your consent to certain processing, you have the right to withdraw your consent at any time regarding further processing of your personal data.

8.6 How to use these rights

You can use these rights by contacting us using the contact information found in the beginning of this Privacy Notice. The requests must be submitted in writing and be sufficiently specific. We may request additional information, if necessary, to confirm the identity of the requestor. We will answer the request at latest one month after the requestor has been identified and we have received enough information to perform the request.

We will inform the recipients of your personal data if you have requested the data to be rectified, erased or restricted, unless this proves impossible or involves disproportionate effort.

We have the right to refuse to act on requests that are manifestly unfounded (obviously unjustified) or excessive, in particular because of their repetitive character, or charge a reasonable fee based on the costs to fulfil the request.

8.7 Right to lodge a complaint with a supervisory authority

You have the right to complain to the competent supervisory authority if you believe your personal data has been processed incorrectly.

Supervisory authority contact information:

Estonia

Estonian Data Protection Inspectorate
Visiting address: Tatari 39, 10134 Tallinn
E-mail: info@aki.ee
Telephone: +372 6828 712
<https://www.aki.ee/en>

Finland

Office of the Data Protection Ombudsman
Visiting address: Lintulahdenkuja 4, 00530 Helsinki
Postal address: P.O. Box 800, 00531 Helsinki, Finland
E-mail: tietosuoja@om.fi
Telephone: +358 (0)29 566 6700
<https://tietosuoja.fi/en/home>

France

CNIL - National Commission on Informatics and Liberty
Visiting address: 3 Place de Fontenoy TSA 80715 75334 PARIS CEDEX 07
Telephone: +33 1 53 73 22 22
<http://www.cnil.fr/>

Germany

Federal Commissioner for Data Protection and Freedom of Information
Visiting address: Graurheindorfer Str. 153, 53117 Bonn
E-mail: poststelle@bfdi.bund.de
Telephone: +49 228 997799
<http://www.bfdi.bund.de/>

Netherlands

Dutch Data Protection Authority
Visiting address: Bezuidenhoutseweg 30, 2594 AV Den Haag
Postal address: P.O. Box 93374, 2509 AJ DEN HAAG
E-mail: info@autoriteitpersoonsgegevens.nl
Telephone: +31 70 888 8500
<https://autoriteitpersoonsgegevens.nl/>

Spain

Spanish Data Protection Agency
 Visiting address: C/Jorge Juan 6, 28001 Madrid
 E-mail: internacional@agpd.es
 Telephone: +34 91 266 3517
<https://www.aepd.es/es>

Sweden

Swedish Data Protection Authority
 Visiting address: Drottninggatan 29, 104 20 Stockholm
 Postal address: Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm
 E-mail: imy@imy.se
 Telephone: +46 8 657 6100
<https://www.imy.se/>

9 SECURITY MEASURES

Neova processes personal data in accordance with applicable data protection laws and regulations and ensures the compliance of the service providers (processors) with contractual measures (data processing agreements).

We have implemented modern technical and organizational security measures to protect personal data from unauthorised access or transfer and accidental or illegal destruction, loss or alteration. The information security and data protection of our systems and environments that contain personal data are managed appropriately as a whole. We ensure the security of the stored data, access rights and processing of the confidential and sensitive personal data.

Access to personal data is limited to those that need it for performing their job. Your personal data is processed by HR representative(s) and the members of the recruiting team (e.g. managers whose area the recruitment concerns and those assisting in the recruitment) and if necessary, a recruiting service provider.

Sensitive data are stored separately from other personal data. The personal data can be accessed by persons with limited access to perform necessary tasks such as administration, basic employment related services and IT services. All persons processing personal data are required to treat the data as confidential. The users of the IT environment are identified and access to the systems is secured and limited by user rights. Access to the physical location is also based on individual access rights and access keys.

Recruitment process participants (recruiting team members) are instructed to destroy all recruitment material outside the recruitment system (notes, prints and other copies), once the process has been terminated. They are also instructed not to print or copy any test results.

10 CHANGES TO THIS PRIVACY NOTICE

Neova modifies and updates this Privacy Notice whenever necessary due to e.g. changes in the recruitment process, service providers or laws and regulations. Significant changes will be communicated to the candidates whose personal data the Neova processes.

11 VERSION HISTORY

Published on 12.6.2019, version 1.0

Version #	Changes	Date
1.1	<ul style="list-style-type: none"> Vapo replaced with Neova. Section 2: Contact details updated. Section 7.1: Standard contractual clauses 	2.11.2021

	replacing model clauses. Removed the mention of EU-US Privacy Shield arrangement.	
1.2	<ul style="list-style-type: none">• Section 2: Changes to the contact information of the data controller.• Section 5: Updated/added categories.	19.1.2022
1.3	<ul style="list-style-type: none">• Attachment 1: Updated the list of Neova Group companies	25.5.2022

ATTACHMENT 1

Neova Group and its fully owned companies (1.6.2022)

Australia

BVB Australia PTY Ltd

China

Kekkilä-BVB Horticulture Co., Ltd.

Estonia

As Tootsi Turvas

OÜ Kekkilä-BVB Eesti

Finland

G&C Materials Oy

Kekkilä Oy

Kekkilä-BVB Oy

Neova Oy

Vapo Oy

France

Brill France SARL

Germany

BVB Gardening GmbH

G&C Materials Germany GmbH

Gebr. Brill Substrate Verwaltungsgesellschaft mbH

Kekkilä-Brill Substrates GmbH & Co. KG

Kekkilä-BVB Germany GmbH

Netherlands

Kekkilä-BVB De Lier B.V.

Kekkilä-BVB Gardening B.V.

Kekkilä-BVB Grubbenvorst B.V.

Kekkilä-BVB Netherlands B.V.

Kekkilä-BVB Logistics B.V.

Spain

Kekkilä-BVB Iberia S.L.

Sweden

Hasselfors Garden AB

Neova AB

United States

Kekkilä-BVB USA Inc.