

HappySignals Privacy Policy for Recruitment

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Privacy Policy for Recruitment

Protection of your privacy is important to us. HappySignals Oy, and its subsidiaries, (hereinafter "HappySignals"), is committed to protecting your privacy in the best possible way and to processing your personal data transparently in accordance with applicable data protection laws and good privacy practices.

We want to be transparent about our data processing. This privacy policy describes how we collect and use personal data about you in connection with our online and offline recruitment and recruitment marketing activities where HappySignals is the data controller, and what rights you have in relation to such data.

We periodically update this Privacy Policy for Recruitment. We will post any privacy policy changes to the Privacy Policy page and, if the changes are significant, when it is possible, we seek to provide a more prominent notice by sending you an email notification.

1. Definitions

Controller refers to the party which is in charge of the processing and determines how the personal data is processed.

Personal data involves any piece of information relating to an identified or identifiable person ('data subject') that allows us to identify a person directly or indirectly.

Processing of personal data relates to any operation or set of operations which is performed on personal data, such as collection and storing of personal data.

2. Controller and contact information

HappySignals Oy (Business ID: 2643260-2)
Aleksanterinkatu 15 B, 00100 Helsinki, Finland

You can contact us by email to privacy@happysignals.com.

3. How do we process your personal data?

HappySignals as a Controller

HappySignals acts as a Controller when we process personal data for our recruitment purposes.

We process personal data to maintain and process job applications and information about candidates HappySignals receives for recruitment purposes and for possible employment and service relationships. Personal data can also be used for contacting applicants, collecting and maintaining a job candidate pool for future purposes, collecting feedback from applicants or for recruitment

marketing. Data processing can be outsourced (with the controller) to companies in the same group and/or to outside service providers according to the data protection law and within the limits of the law.

The data on candidates is stored by Breezy HR, Inc. It is a US based service provider, and part of the Learning Technologies Group based in UK. The service provider is used for processing the job applications. HappySignals and Breezy HR have appropriate contractual arrangements, including standard terms and clauses approved by the EU Commission, to ensure your data is safe and lawfully processed.

The data is stored confidentially and can only be accessed by HappySignals employees whose job description demands it, or business partners participating in the recruitment process.

We may also process your personal data in relation to your application for data and statistical analysis. Collected data will not be used for automated decision making or profiling.

3.1. Data content

When you apply for a job at HappySignals, we ask you to provide us with some personal information about yourself so we can evaluate your application. If this information is not provided, our ability to consider you as a candidate may be limited. You may also provide us with your personal information that we have not specifically requested (for example, your CV with information about your hobbies). All information is provided on a voluntarily basis and you can determine the extent of information that you provide to HappySignals.

The personal information we collect about you may include:

- Basic information and contact details (name, email, phone number, address, nationality as well as work and residence permit information of foreign employees)
- CV and application letter (documents)
- Information concerning educational background, certificates, language skills
- Information concerning work experience and references
- Applicant's preferences about the prospective job and salary request
- Information related to the applicant's experience and competence profile and interview notes
- Background screenings (where relevant to your application/potential role and permitted under applicable law)
- Possible information needed for recruiting (such as personal evaluations and aptitude tests) as well as possible information the applicant has willingly provided (such as photos)
- An activity log about all actions done to the candidate and communication conducted with the candidate
- Certain technical information from you about your visit to our website using "cookies" and other similar technologies (<https://www.happysignals.com/privacy-policy>)

HappySignals does not generally request sensitive personal information. Sensitive personal data is a subset of personal data that includes ethnicity, health, trade union membership, philosophical beliefs, sexual orientation, and other categories as prescribed by law. We may collect sensitive personal data about you to the extent permitted to do so by applicable laws (e.g., U.S. equal opportunity laws, EEOC

Compliance) and to support our efforts to monitor equal opportunity or to create an inclusive and diverse work environment.

We may also collect sensitive personal data to the extent that you choose, without being asked, to voluntarily disclose it during the recruiting process. If you have a disability and would like for us to consider an accommodation, you may provide that information during the recruitment process. However, providing the sensitive personal data is voluntary. If you provide us with this information, it will not be considered in the recruitment or selection process.

4. How do we collect and disclose personal data?

HappySignals collects data for recruitment purposes through:

Direct interactions

We mainly collect your personal data from you, for example when you provide us with your CV, fill out our application form and provide us with information about you in the employment interviews.

You are responsible for the information you provide to HappySignals or our third party partners (see the following) and that it is honest, truthful, accurate and not misleading in any way. If you provide information concerning any other person such as your references, you are responsible for providing any notices and ensuring your referee consents to HappySignals collecting and processing that information as described in this Privacy Policy for Recruitment.

Third parties or publicly available sources

We may receive data about you from third parties such as reference contacts you have given us, third parties such as talent acquisition or skill assessment companies or external websites if you have referred to such websites— this may include sources such as LinkedIn.

We may have to disclose certain information to public authorities or law enforcement when this is required by law.

Some of our service providers or their support functions are located outside the EU and EEA.

The personal data is processed in our recruitment system Breezy HR. It is a cloud-based application tracking system (US). When the processing involves transferring personal data outside EU or EEA, we use appropriate legal mechanisms to ensure the same level of data protection as in the EU. We comply with the EU-U.S. Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries (including Iceland, Liechtenstein, and Norway), the United Kingdom and Switzerland transferred to the United States pursuant to Privacy Shield. Breezy HR, Inc. has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. The privacy policy of Breezy can be found in: <https://breezy.hr/privacy>.

In the event we go through a business transition, such as a merger or acquisition by another company, or sale of all or a portion of its assets, personal data is likely be among the assets transferred, which means that the acquiring entity may obtain access to relevant customer data assets.

When sending the job application, you accept the possible transfer of your data.

Personal data is not given in recruitment process to outsiders of HappySignals except to the Third parties mentioned above. In a potential recruitment, information is given internally to our HR register and with the controller for the use mentioned in Section 2 in this Privacy Policy, however, always according to the data protection law and within limits of the law.

5. How do we secure your personal data?

HappySignals has taken appropriate security measures to protect the personal data you provide from potential loss, misuse or unauthorized access.

We maintain (and require our service providers) to maintain appropriate organizational and technical measures designed to protect the confidentiality, integrity and availability of any personal information we process. We are using role-based access controls, and secure connections, to prevent unauthorized access to confidential information. All the employees and business partners authorized to process your data have further committed themselves to confidentiality. We are following principle of least privilege, restricting employees' access only to the information required for their job.

The personal data is processed with care and when the data is processed with help of the data systems it is properly secured and protected. When personnel data is stored in internet servers, the physical and digital data security is taken care of appropriately, as described here.

The controller uses the protection as required by the law, company's data security and non-disclosure agreements, and corporate policies and standards.

If you have any questions on the security measures that we use to secure your personal information, you may contact us by email: privacy@happysignals.com.

6. What rights do you have?

You have several rights concerning your personal data, such as right to access, update, delete and have a copy of such data. We want to ensure that you can efficiently exercise your data protection rights. You can exercise your rights by contacting us via our email: privacy@happysignals.com.

You can also contact us by a letter to the address:

*HappySignals Oy (2643260-2)
Data Privacy Officer
Aleksanterinkatu 15 B
00100 Helsinki
FINLAND*

We are happy to help you with any request concerning your personal data. We will process all inquiries individually and by a real person. We answer the request in the regulated time defined in the Data

Protection Regulation (within a month, in general). HappySignals can, if needed, ask the data subject to clarify the request in written and the data subject's identity can be verified before further actions if needed.

Please notice that in case we are not able to identify you, we cannot execute your rights unless we are provided with an additional information which helps us to identify the data concerning you.

Data subject's rights

6.1 Right to rectify your data

We aim to keep your personal data correct, completed and up to date at all times. You can ask us to rectify any inaccurate or incomplete data by contacting us. The correction is done as soon as possible.

6.2 Right to restriction of processing your data

In certain circumstances, you have the right to request a temporary restriction of the processing of your personal data. For example, if you contest the lawfulness of the processing or deny the accuracy of your personal data, or if you need your data in legal proceedings. In the case of a temporary restriction, we will exclude all the personal data we have about you from daily use until the matter has been solved.

6.3 Right to object to the processing of your personal data

When we process your data on the basis of our legitimate interests, for example, for recruitment or recruitment marketing purposes, we ensure that such processing will not cause any significant intrusion into your privacy, or any other undue impact on your interests and rights. If you wish us to stop processing of your personal information, or if you wish to stop receiving our recruitment process related messages or recruitment marketing emails, please contact us.

6.4 Right to have your personal data erased ("right to be forgotten")

In principle, you have right to have your personal data erased in part or in full. We will, for example, erase your personal data when it is no longer needed for the purposes it was originally collected for, or when the processing of your personal data is based on your consent and you withdraw such consent. Please note that we will not be able to erase the personal data if there is a valid legal obligation or another justified need to retain the data for a longer period of time. If you wish us to erase your personal data, please contact us.

6.5 Right to withdraw consent

When you have given a consent for the processing, and you do not want us to continue processing your data, you have a right to withdraw your consent at any time by contacting us and informing to withdraw you consent.

6.6 Right to data portability

You have a right to request transferring certain personal data. The right to transfer is applicable only when we process your personal data based on your consent or agreement and it applies only to personal data you have provided us yourself. We will provide your personal data in machine-readable format so that you can store it yourself or transfer it to another service provider. Upon your request, we will transfer the data to another controller directly if it is technically feasible.

6.7 Right of access to your data

You have the right to obtain a confirmation whether your personal data is being processed or not at any time. If we collect personal data about you, you are entitled to receive a copy and obtain information regarding the processing of such data. You can request for all of the data related to you at any time by contacting us. HappySignals will compose a document of all the data we have for you to analyze.

6.8 Right to lodge a complaint with a supervisory authority

If you consider that the processing of personal data relating to you infringes the data protection laws, you have the right to lodge a complaint with your local data protection authority. If you need help with the exercise of this right or have any questions relating to the processing of your personal data, please contact us.

7. How long is your data retained?

We have determined retention periods based on the purpose of the processing and the applicable legislation.

The information provided by the applicant is stored in the register for two (2) years and may be retrieved with regard to later application processes. If you accept an offer of employment by us, any relevant personal data collected during your pre-employment period may become part of your personnel files.

For more detailed information about our retention times, please contact us.

8. Privacy policy updates

We periodically update this Privacy Policy for Recruitment. We will post any privacy policy changes the Privacy policy page and, if the changes are significant, when it is possible, we seek to provide a more prominent notice by sending you an email notification.