

Privacy Policy – Employees and freelancers

Last update: 12 June 2025

Introduction

We value your fundamental right to privacy. As a company based in the European Union, we adhere to our obligations under the General Data Protection Regulation (GDPR). In this document, we inform you about our processing of your personal data if you are working for us as an employee or freelancer, or if you apply for employment with us.

For clarity, we have divided the privacy policy into two parts:

- **Part 1** contains general information about personal data processing.
- **Part 2** applies to the processing of your personal data specifically.

If you have any questions or concerns regarding the processing of your personal data, please don't hesitate to contact us:

Gubbe Sydänystävä Oy

Privacy team

Erottajankatu 1–3 A 8, 00130 HELSINKI, FINLAND

Tel: +358 44 724 6007

Email: privacy@gubbe.com

Data Protection Officer: Susanna Laanikari (contact details as above)

We may update our privacy policies from time to time. The date of the last update is shown above. Minor changes will be shown in this document, and we ask that you review it regularly. Changes that significantly affect your rights and freedoms will be communicated to you by email or notification if we have your contact details.

Part 1: General information

Categories of personal data

As you work for us as an employee or freelancer, or if you apply for employment with us, we regularly process certain categories of your personal data. These depend on the various purposes that we process your data for. A detailed list of the various purposes and categories of data that we process is shown in Part 2 of this privacy policy.

Some categories of personal data are mandatory in the sense that if you refuse to give us certain data, we cannot organise and manage your work or carry out other critical processes related to our employment relationship. In some cases we may also have a legal duty to process certain categories of your personal data. We have marked clearly, which categories of personal data are mandatory for a given purpose.

Sources of personal data

We primarily process personal data that you give us, for instance when we discuss our business matters or sign a contract, or when you subscribe to your company newsletter.

However, in some cases we may receive personal data relating to you from other sources. These are:

Source	Examples
Public authorities and registers	<p>If the law requires that we conduct a background check on you, we get information about you from the police and other authorities.</p> <p>We also get salary-related data and other regulated data (e.g. your income tax rate and limits) from various public registers.</p>

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Occupational healthcare provider	When you work with us, you may need to visit the doctor or nurse every now and then. If relevant for our employment relationship (e.g. to pay you sick leave salary or to care for your wellbeing), we receive information about you from the healthcare provider.
Recruitment platforms and agencies, and headhunters	In some cases we recruit people through recruitment platforms and agencies, and sometimes we hear about you from a headhunter. If that's the case, we receive relevant information about you from those sources (they usually get this data directly from you).
Referrals	If you name other persons as referrals in your application, we may contact them with your permission to learn more about you. If that's the case, we receive relevant information about you from those sources.
Social media and the internet	If you link your professional or private social media account, website or other internet source to your application or share it with us otherwise, we may take a look at it with your permission to learn more about you. If that's the case, we receive relevant information about you from those sources.
Service users and other customers	If we receive feedback from our service users or other customers, it may contain your personal data. If that's the case, we receive information about you from those sources.
Technical sources	We use cookies and similar technologies on our website and other platforms. If you visit our website or use our internal tools for work, these often collect and process certain technical personal data, such as your IP address and device identifiers.

Retention periods of personal data

When processing your personal data, we adhere to the principle of storage minimisation. That means we only keep your personal data as long as necessary for the purposes that we describe more in detail in Part 2, and only as long as we have a legal basis set out in the GDPR to process the data.

As soon as no relevant purpose or legal basis applies, we will either erase your personal data or anonymise it in an irreversible manner.

Sharing your personal data with third parties

As a provider of commercial services and as an employer, we like most other companies have to outsource some of the processing of your data to our trusted partners. Because of that, we share certain categories of personal data with third parties.

We always make sure that all disclosures are protected by a contractual arrangement between us and our trusted partners to protect your personal data, as required by the GDPR.

Our trusted partners can be categorised as follows:

Category of recipient	Examples
Employment relationship management tools	<p>We use cloud-based HR management systems provided by our trusted partners to store and manage our employee and freelancer information. Your personal data is also included in this information.</p> <p>Other examples include:</p> <ul style="list-style-type: none"> • Digital signature services (to sign an employment contract and other documents) • Calendar and booking services (e.g. if we book a job interview with you or, when you work with us,

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	when you organise and manage your working time and tasks)
Data storage and information management services	<p>We use cloud-based data storage and information management systems provided by our trusted partners to store and manage various types of documents and other data. Many of these documents and other data include also your personal data.</p> <p>Other examples include:</p> <ul style="list-style-type: none"> • Document management services (e.g. to draft, edit, store and share written documents) • Online collaboration tools (e.g. Slack)
Communications and deliveries	<p>We use hosted emailing and other communications systems (such as email services and instant messaging platforms) provided by our trusted partners. When we communicate with you, or when we include your personal data in our communications with others, your personal data passes through these systems.</p> <p>We also use hosted computing systems to deliver our services. When we deliver our services to you, these systems process your personal data (e.g. device identifiers, unique ID's and similar).</p> <p>Other examples include:</p> <ul style="list-style-type: none"> • Internet phone call services (e.g. VoIP) • Video call service providers (e.g. if we have a video call with you or you participate in our webinar) • Online event and webinar services

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	<ul style="list-style-type: none"> • Electronic newsletter services (e.g. to send employment-related emails to everyone) • Letter mailing and postal services
Marketing	<p>We use trusted partners in sending out marketing communications (e.g. to send you tips about our new job openings if you've given us permission to do so). These partners process some of your personal data (such as name and contact details).</p>
Billing, accounting and taxation	<p>We use payment processing and other services provided by our bank to pay your salary and other payments. When we send you your salary slips or otherwise process payment information, your personal data (such as name, social security number and bank account number) may be shared with them.</p> <p>We also use external accountants and auditors to handle our bookkeeping and other financial matters. They have a legally mandated access to our financial documentation, which may include your personal data (such as name, social security number and contact details).</p> <p>Other examples include:</p> <ul style="list-style-type: none"> • Accounting software service providers (e.g. to store your salary slips for bookkeeping)
Website and other platforms	<p>We use hosted website and content delivery network systems, as well as cookie management tools provided by our trusted partners. When you use our website and internal platforms, these systems process your personal data (such as your IP address and device identifiers) through technical sources.</p>

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Occupational healthcare provider	If required by law, we may have to share your information with our occupational healthcare provider.
Professional advisers	From time to time we use external consultants and advisers to help us with various things. These may be for example business consultants, financial advisers, and legal advisers who, depending on the circumstances, may need to access various types of information, including our customer data.
Public authorities	If we are legally required to hand over information about our employees (salary data etc.) to public authorities, this may include your personal data.
Mergers and acquisitions	If we are ever subject to a merger or acquisition by another company, all of our data, which naturally includes employees' and freelancers' data, may be legally transferred to that company.

Transfers outside the EU/EEA

We normally process your personal data exclusively within the European Union and European Economic Area. In some cases, we or our trusted partners process your personal data outside these areas. If that happens, we will make sure through various safeguards that your personal data will be processed in a compliant way.

Some of your personal data are transferred to the following countries:

Country	Safeguards
United Kingdom	This country has been determined to be safe for transfers of personal data, in accordance with an adequacy decision issued by the European Commission.
United States	We and our trusted partners make sure that transfers are protected under the EU-US Data Privacy Framework

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	approved by the European Commission. If not, we and our trusted partners make sure transfers are protected by contractual arrangements using the Standard Contractual Clauses (SCC) issued by the European Commission. Should we be unable to take any of these precautions, ultimately we'll ask for your consent for the transfer.
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If you wish to learn more about the ways we protect your data when transferring outside the EU/EEA, please contact us using the contact details above.

Your rights

According to the GDPR, you have various rights as we process your personal data. These are:

Type of right	Description
Right of access	<p>You may ask us whether we process any personal data about you, and if we do, you have a right to request a copy of some or all of the data. You also have a right to ask for more information regarding the third-party recipients of your personal data as well as our protective measures applicable to the transfers of your data to our trusted partners and outside the EU/EEA.</p> <p>If you request a copy of your data, we will send it to you electronically. In most cases we will be glad to accommodate your request, but if we receive repeated or manifestly unfounded requests from you, we may have to refuse or charge a reasonable administrative fee to process your request.</p>
Rectifying incorrect or incomplete personal data	If you consider that some of your personal data that we process is incorrect or incomplete, you may ask us to correct or complete the data. We will investigate your request without undue delay, and accommodate it if

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	we can be sufficiently certain that the request is justified.
Erasing personal data (“the right to be forgotten”)	If you don’t want us to process your personal data, you may ask us to erase a part or all of it. We will do our best to accommodate your request, but in some cases we may have to refuse or postpone the request. This may happen e.g. if we have an on-going employment relationship with you and we need your personal data to provide our services to you, or if we have a legal duty or a legitimate interest to retain some of your data (we have described these in more detail in Part 2).
Restricting the processing of personal data	<p>If you consider that our processing of your personal data breaches the GDPR or other laws, you may ask us to restrict the processing (i.e. to stop the processing for the time being). We will accommodate your request as well as possible while we investigate the matter.</p> <p>You may also ask us that we do not erase or otherwise process your personal data if you need the data e.g. in a legal dispute and the erasure or other processing would jeopardise your interests in that regard. We will aim to accommodate your request as well as possible.</p>
Objecting to processing of personal data	<p>As explained in detail in Part 2, we sometimes process your data on the basis of our or someone else’s legitimate interest. If that’s the case, you may object to our processing of your data on that basis due to a reason relating to your particular circumstances. We will aim to accommodate your request as much as possible, however in some cases the legitimate interests in question may be so important that they outweigh your interest to object.</p> <p>If in that case we cannot accommodate your request, we will let you know about our reasons for not doing so</p>

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	<p>and inform you about your right to lodge a complaint with the relevant data protection authorities.</p> <p>If we have contacted you for direct marketing purposes (e.g. to let you know about a job opening), you may also object to our processing of your personal data for that purpose. (In other words, you may prohibit us from contacting you for direct marketing purposes). We will accommodate your request without undue delay.</p>
Withdrawing consent	<p>As explained in detail in Part 2, we sometimes process your personal data on the basis of your consent. If that's the case, you may, at any time, withdraw your consent for that processing. We will accommodate your request without undue delay, however we may continue the processing if we have another legal basis to do so. Please note that withdrawing consent will not affect the prior processing of your personal data.</p>
Right to lodge a complaint	<p>If you consider that our processing of your personal data breaches the GDPR or other laws, you may at any time lodge a complaint with the relevant data protection authorities. In Finland, you can contact the Data Protection Ombudsman: www.tietosuoja.fi</p>

To exercise any of your above rights, please contact us using the contact details shown at the beginning of the document. We'll be glad to assist you.

Cookies and tracking

Like most other companies and organisations, we use cookies and similar technologies on our website, online services and communications. We will

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adhere to applicable laws regarding the prerequisites for the processing of your personal data in such ways.

We have described in detail the types of cookies and similar technologies we use as well as their purposes in our [cookie policy](#).

Part 2: Processing of your data

As you work for us as an employee or freelancer, or if you apply for employment with us, we process your personal data in certain ways in the context of that relationship. Here we describe the purposes of processing your personal data together with the appropriate legal bases for the processing, as well as the categories of personal data processed together with their retention periods.

Purposes and legal bases of the processing of personal data

According to the GDPR, all processing of personal data must be justified using a legal basis found in the law. First, here is a short description of the legal bases that we use:

Legal basis	Description
Contract (including contract preparation)	As you are our employee or freelancer, or if you become one, to set up our contractual relationship and to perform our contractual obligations toward you we need to process certain categories of your personal data.
Legal obligation	As an employer, we have a number of legal obligations to fulfil. For instance, we must keep financial records of all salaries and related payments, which may include your personal data.
Consent	In some cases, we may ask for your consent to process your personal data. If we receive your consent, we may process your data on that basis within the limits of the consent. For instance, if we process your health information for salary payment purposes (e.g. if we need to clarify details about a certain sick leave), we ask for your consent to get the necessary information from our healthcare provider.

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Legitimate interest	In some cases, we may process your personal data if it's justified for our or someone else's legitimate interest. We only do so after having assessed your rights and freedoms against the importance of the legitimate interest (we conduct a so-called "balancing test").
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Here is a complete overview of our purposes of processing and the corresponding legal bases:

Purpose	Legal basis	Examples
Organising and managing work	Contract	In order to organise and manage your work as contracted, we need to process some of your personal data.
	Legal obligation	As an employer, we are under an obligation to monitor and care for various aspects of your work, such as your working time. To do this, we process your personal data.
	Legitimate interest	As you carry out your work tasks, we as your employer have a legitimate interest in monitoring your work performance.
Managing employment relationship	Contract	Apart from organising and managing your work, we do a number of things to maintain our employment relationship with you. We may for instance keep notes of your overall work activities, and offer training and career-path support.
	Legal obligation	As an employer, we are under an obligation to monitor and care for your health, safety and wellbeing at work. To do this, we process your personal data.

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	Legitimate interest	To support your wellbeing and to improve our company culture, we may take notes of your and everyone else's employee satisfaction, cultural fit and other aspects, and to provide guidance and support to you and others.
	Consent	We also ask for your consent where we are obligated to do so. For instance, if we process your health information to determine if you are entitled to a sick leave salary, we usually ask for your consent.
Payment of salary and other payments	Contract	As you work for us, we pay you salary and other payments as agreed. To make those payments, we need to process some of your personal data.
	Legal obligation	As an employer, we have an obligation to keep track of your salary and other payments, and to take care of related expenses such as insurance and pension payments.
Accounting, tax and income reporting	Legal obligation	We have a legal duty to keep records of and report our salary payments and other payments to you. For instance, we must report your income from us to public authorities.
Recruitment	Legitimate interest	If you apply for employment with us, we have legitimate interests in processing your information when for example evaluating your application and interview performance.

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	Legal obligation	Sometimes we have a legal obligation to process your information as part of the recruitment process. This is the case for instance when we are required to conduct a mandatory background check on you.
	Contract	If everything goes great and we decide to hire you, to draw up our employment contract we need to process some of your personal data.
	Consent	If you apply for employment with us, we may process information that you have not provided us directly (e.g. information that we get from your referrals or from your social media page). We usually ask for your consent to do that.
Communications and PR	Consent	If we process your personal data for recruitment marketing purposes (e.g. to send you news about job opportunities at our company), we ask for your consent.
	Legal obligation	As an employer, we are under an obligation to communicate with you and other employees about a number of things. For example, if there are organisational changes in the workplace, we will let you know.
Managing risks and protecting interests	Legal obligation	As an employer, we are under an obligation to monitor and manage various work-related risks, such as health and safety incidents and interpersonal disputes. To do that, we process your and others' personal data if the matter is pertaining to you.

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		We also process legally required background checks and other background information (if required) for risk management purposes.
	Legitimate interest	To manage risks and to protect various business interests, we monitor your overall work performance, and we process and record possible customer feedback and other information. If needed, we offer you guidance and support. To do those things, we process your personal data.
Technical functioning and security	Legitimate interests	Some of the internal tools and services that you use for work collect and process personal data for technical reasons. For instance, to allow you to use our internal reporting tools safely, we need to ensure the proper technical functioning and security of the platform. This often includes processing of personal data such as necessary cookies and other technical identifiers.
	Consent	In some cases the tools and services that you use have functions that collect and process your personal data for purposes that are not strictly necessary for safety and technical functioning (e.g. in case of cookies used to improve the visual appeal of an internal reporting platform). If that is the case, you will be asked for your consent to process the data.

Categories of personal data processed and their retention times

The below table contains a detailed description of the categories of personal data that we process for our various purposes. If a certain category is mandatory by law or contract (e.g. if we need the information to fulfil our legal obligations or to manage and support you as an employee or freelancer), we've mentioned that in the table.

The table also contains a list of our retention times for different categories of personal data under a given purpose. Once a specific retention period runs out, we will erase the relevant personal data or anonymise it irreversibly, unless a different purpose with a longer retention period applies.

For instance, we keep personal data for the purposes of communications (like e-mails containing your name and e-mail address) for a set period of time as shown below. Once the retention period runs out, we will erase the relevant data unless we need to keep it for the purposes of risk management for a longer period of time as shown below. If so, we will continue to retain the data until the additional retention period runs out.

Purpose	Categories of personal data	Retention period(s)	Examples
Organising and managing work <i>All personal data for this purpose are mandatory to facilitate our contractual relationship.</i>	Name, contact details, social security number	2 years from the end of the calendar year in which the data was collected or created.	To organise and manage your work as your employer, we need to process your personal data. We will keep the data for some time in
	Work performance		
	Working time, absences		

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			case we need to check back later.
Managing employment relationship <i>Personal data marked with (*) are mandatory by law or to facilitate our contractual relationship.</i>	Name, contact details, social security number (*)	2 year from the end of the employment relationship.	To maintain and develop our active employment relationship with you, we process your personal data. We will retain essential data in your employee file, and if the employment relationship ends, we will retain the data for an additional safety period. However, as the employment relation continues, we will regularly delete older data that is no longer needed.
	Work duties, tasks (*)		
	Signature (*)		
	Messages and correspondence	2 year from the end of the employment relationship.	
	Preferences and behavioural information		
	Health, safety and wellbeing information and incidents (*)	However 5 years maximum during the employment relationship.	
	Customer and employee feedback	Except 10.5 years for work certificates as required by law.	
	Legally required background checks (*)		
	Work certificates		
	Consents and prohibitions		
Payment of salary and expenses <i>Personal data marked with (*) are mandatory by</i>	Name, bank details, social security number (*)	2 years after the end of the employment relationship.	As we pay you salary and other payments, we process your personal data on pay slips and financial records.
	Working time, absences (*)	However 6.5 year minimum for	

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<i>law or to facilitate our contractual relationship.</i>	Salary, bonuses, expenses	information prescribed by financial reporting laws.	We'll retain that information to keep our business records up to date.
Accounting and taxation <i>All personal data for this purpose are mandatory to facilitate our contractual relationship as well as to fulfil our legal obligations.</i>	Name, social security number (*)	2 years after the end of the employment relationship.	As part of our bookkeeping, we collect and retain relevant personal data in our accounting platform as well as financial books and accounts.
	Income data	However 6.5 year for information prescribed by financial reporting laws.	
	Pay slips	Except 10.5 years for pay slips as required by financial reporting laws.	Some information, such as salary payments and receipts, must be retained for a legally prescribed period. During that period, we will only retain personal data that is contained in those legally prescribed documents.

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Recruitment <i>Personal data marked with (*) are mandatory by law or necessary for us to process your application.</i>	Name, contact details (*)	<p>1 year from the collection of the data.</p> <p>However indefinitely if you have subscribed to receive our recruitment newsletters or have asked to be contacted in case a suitable position opens up.</p>	<p>If you apply for employment or freelancership with us, we will keep your personal data on file for a brief period to allow us enough time to process your and others' applications.</p> <p>If you subscribe to receive our recruitment newsletter or wish to be contacted about suitable opportunities in the future, we will keep your name and relevant contact details on file indefinitely (or until you unsubscribe).</p>
	Work duties, tasks	<p>1 year from the collection of the data.</p>	<p>If you apply for employment or freelancership with us, we will keep your personal data on file for a brief period to allow us enough time to</p>
	Messages and correspondence		
	Job application data (*)		
	Job interview data		

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	Non-pertinent applicant information		process your and others' applications.
	Social media, other online information		
	Legally required background checks (*)		
	Consent to process personal data not received directly from you		
Communications and PR <i>Personal data marked with (*) are mandatory if you wish to get in contact with us, or if we need to send important notices or updates to you.</i>	Name, contact details (*)	2 years from the end of the employment relationship.	We retain personal data from our communications and PR correspondence with you, to make sure our correspondence won't be lost too soon, or to make sure that you'll receive information on and updates to matters that are relevant for you.
	Messages and correspondence (*)	However 5 years maximum during the employment relationship.	
	Social media content and other public information		
	Email analytics	See our cookie policy.	When we send you newsletters about new job opportunities, to measure delivery

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			rates and other aspects, we process your personal data through email analytics.
	Direct marketing consents and prohibitions Email analytics consents and prohibitions	Indefinitely	If you have prohibited us from contacting you about new job opportunities, or from analysing newsletter deliveries, we'll make a note of it and retain it indefinitely (or until you instruct us otherwise).
Risk management and protecting interests	Name, contact details, social security number	3.5 years from the end of active processing.	To manage our risks and to protect your and our legitimate interests, we retain some personal data from the end of active processing in accordance with the other purposes described in this chart. We do so so that for instance in
	Messages and correspondence related to the following		
	Health and safety information and incidents		
	Performance reviews and warnings		

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	Legal disputes		case of a security incident that has to be investigated later, or a legal dispute about our contract, any critical evidence will not have been lost.
	Customer and employee complaints		
	Legally required background checks	5 years from the date of the background check.	
Technical functioning and security <i>Personal data marked with (*) are mandatory to the extent that we have a justified interest in ensuring the technical functioning and security of our electronic services or we have a legal duty to obtain your consent.</i>	Strictly necessary technical identifiers (*)	See our cookie policy.	We collect, process and retain technical identifiers in our digital platforms and tools in case we need to address a technical or security issue.
	Not strictly necessary technical identifiers		If we use cookies and similar technologies to collect and process personal data for purposes that are not strictly necessary for the technical functioning and security of the website, we ask for your consent.

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	Consents and prohibitions		We record your consent (or denial) in our cookie management tool, which retains the information as described in our cookie policy.
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