

## **Smartly.io - Privacy Notice for Recruitment**

As part of recruitment process, Smartly.io Solutions Oy and its group companies (“**Smartly.io**”) collect and process personal data relating to job applicants. This Privacy Notice explains how we manage your personal data for the purposes of processing and considering your application for employment at Smartly.io. This Privacy Notice only applies to the personal data of job applicants, potential candidates for employment, and our optional recruiting programs and events. As used in this Privacy Notice, “personal data” means information that identifies job applicants and potential candidates for employment with us, either submitted as part of the online application and/or through alternative channels.

### **1 The controllers**

For the processing of the personal data for the purposes described herein, the controllers are Smartly.io Solutions Oy (having its registered office at Elielinaukio 2G, 00100, Helsinki, Finland) and the respective Smartly.io’s subsidiary or affiliate in a country in which the applicant has applied a position. All contacts and inquiries related to this Privacy Notice should be addressed to [privacy@smartly.io](mailto:privacy@smartly.io).

### **2 Types and sources of personal data we collect and process**

Smartly.io processes various types of personal data relating to you when you are applying for a position at Smartly.io, such as:

- your basic information including your name, address and contact details (such as phone numbers and email addresses);
- information from your resume or the application form, such as skills and other employment history details;
- information about your education, academic transcripts or qualifications;
- information relating to references as provided;
- whether you possess a permit of working and/or reside in the country your applying to work in;
- information collected during the interview process such as internal interview feedback; and
- other relevant information that is provided by you in any stage of the recruitment process (for example information on your LinkedIn profile, if you have opted to apply with LinkedIn)

Smartly.io may collect this information in a variety of ways. We primarily collect information directly from you, for example, in application forms submitted on our website, CVs or resumes, or through interviews or other forms of personal contacts, phone calls or e-mails. We may also collect personal data about you from third parties, such as references. Subject to applicable national legislation, we may also collect personal data from public sources, and conduct background checks and assessments and store information from those for the purpose of the recruitment process.

You are under no statutory or contractual obligation to provide data to Smartly.io during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

### **3 Purposes and legal grounds for the processing**

Your personal data is processed only for the purposes by our recruitment team for the recruitment and selection process. The processing of your data is therefore necessary in order to take steps prior to entering into an employment contract and for Smartly.io’s legitimate interests, i.e. the interest to assess and evaluate job applicants before deciding on making an offer of employment. In some cases, we need to process data to ensure that we are complying with our legal obligations, such as to check a successful applicant’s eligibility to work in the country before the beginning of the employment relationship.

Smartly.io does not regularly process any special categories of data, such as information about ethnic origin, sexual orientation, religion or status of health. However, if we process any such data you will be explicitly informed about it and we will process such data strictly for carrying out obligations and exercising specific rights in relation to the employment.

The open career opportunities published on our website do not constitute an offer or promise of employment. We may remove or change without notice any aspect(s) of the employment positions, compensation, and benefit plans described on our careers website. Our website provides descriptions of possible positions at Smartly.io, and is not providing terms or conditions of employment. Any employment offer that may follow as a result of the recruitment process is in accordance with the specific terms of that offer.

## **4 Access to and disclosure of your data**

Only those persons who are involved in the recruitment process will have an access to your personal data on a strict 'need-to-know' basis and solely for the purposes described above.

In addition, to operate as a global digital business and to promote applicants' career opportunities within Smartly.io, it is necessary to process and transfer applicant data within Smartly.io. Applicant's data will be entered in a centralised database in order to make relevant candidate data available for Smartly.io's recruiters from the various countries where Smartly.io operates. The use of this database will involve transferring your personal data outside the country of your residence. Smartly.io has implemented appropriate safeguards in line with the applicable laws (such as EU General Data Protection Regulation, GDPR) for the transfer and processing of applicant data to the locations in the various countries we operate (potentially located in a third country outside the European Economic Area).

We use third party service providers to provide a recruiting software system. We also share your personal data with other third party service providers, who may assist us in recruiting talent, administering and evaluating pre-employment screening and testing, and improving our recruiting practices. Prior to disclosing any information to any third party, Smartly.io will, to the extent permitted by applicable laws, ensure that all third party recipients are bound by strict standards of security and confidentiality.

Furthermore, Smartly.io may be obliged to disclose certain applicant data to third parties, such as government authorities, or for the purpose of protect our legal rights, in accordance with applicable laws.

## **5 Retention period**

We will only hold your personal data for as long as it is necessary for the purposes described in this Privacy Notice.

In case you have applied to a certain open position and your application was not successful, we will retain your data after the recruitment and selection process for up to one (1) year in order to be able to contact you, if any of our future job opportunities would seem to match your profile, if you have consented to such processing and you have not requested us to delete your data in accordance with section 6. We may also retain certain data, if there is a legal obligation to do so (e.g. data required for demonstrating the compliance with the equal opportunity requirements in local employment laws).

When an application is filed as an open application, your personal data shall be retained for up to one (1) year after the application filing date, after which the data is erased unless law requires longer retention.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to our HR files for the purposes of your employment.

Smartly.io evaluates the necessity and accuracy of the personal data on a regular basis.

## **6 Security**

We have taken adequate technical and organisational measures in order to keep personal data safe and to secure it against unauthorized access, loss, misuse or alteration by third parties, such as encryption, access controls and firewalls. Nevertheless, considering the cyber threats in modern day online environment, we cannot 100% guarantee that our security measures will prevent illegally and maliciously operating third parties from obtaining access to personal data and the absolute security of that information during its transmission or its storage on our systems.

## 7 Your rights as a data subject

Under the data protection laws (such as General Data Protection Regulation, GDPR) you have a number of rights with regard to your personal data. You have a right to request from Smartly.io:

- access to your personal data;
- rectification or deletion of incorrect data;
- deletion of data for example where the data is no longer necessary for the purposes of for which it was processed;
- object to the processing of your data where the processing is based on our legitimate interests as the legal ground for processing; and
- data portability of personal data you have provided to us and is processed on the basis of your consent or contract.

Where the processing is based on a consent, you have a right to withdraw such consent at any time.

The applicant may exercise these rights by contacting the contact person provided above in Section 1.

In case you consider that your rights under the data protection laws are violated, you may lodge a complaint with a supervisory authority (e.g. in Finland – the Finnish Data Protection Ombudsman).

## 8 Contact information

### **Data controller:**

Smartly.io Solutions Oy jointly with its affiliates.

**Data Protection Officer:** For inquiries you wish to send directly to our Data Protection Officer, you can reach our DPO at

ISiCO GmbH

Attn: Data Protection Officer

Am Hamburger Bahnhof 4, 10557 Berlin (Germany)

[DPO@smartly.io](mailto:DPO@smartly.io)

**General privacy inquiries:** For inquiries related to our personal data processing such as opting out from direct marketing or requesting deletion of your personal data, you can reach out the Smartly.io privacy team at [privacy@smartly.io](mailto:privacy@smartly.io).