

Filing system	Recruitment Privacy Notice
Controller	Name Patria Plc
	Address Arkadiankatu 2 FI-00100 Helsinki, Finland
	Other contact information: info@patriagroup.com
Data protection officer / contact person in matters relating to the filing system	Azahara González Compliance Manager for Internal Controls
	Address Hatanpään Valtatie 30 FI-33100 Tampere, FINLAND
	Other contact information security@patriagroup.com
	<p>Where you apply for a role with us through Adecco, and where we jointly manage certain parts of the recruitment process, we act as joint controllers with Adecco Finland under Article 26 of the GDPR. Please see their Recruitment Privacy Notice <a href="#">here</a></p> <p>This joint controllership applies to candidates located in or applying for roles in: Finland, Belgium, Sweden, the Netherlands and Latvia, where we jointly determine the purposes and essential means of processing personal data during the early recruitment stages.</p>
Our respective responsibilities include:	<ul style="list-style-type: none"> <li>• Co-determining recruitment campaign objectives and candidate selection criteria</li> <li>• Coordinating job advertising and candidate sourcing activities</li> <li>• Managing application intake, candidate communications and pre-screening</li> <li>• Ensuring appropriate technical and organisational measures are in place</li> </ul> <p>Each party remains responsible for safeguarding your personal data within its own systems and for complying with applicable data protection law.</p> <p>You may exercise your data protection rights (including access, rectification, erasure, restriction, objection and data portability where applicable) with either us or Adecco Finland.</p> <p>The party receiving your request will cooperate with the other to ensure it is handled within statutory timelines.</p> <p>Further information on the essence of our joint controller arrangement is available upon request.</p>
Purpose of Processing	<p>We process your personal data for the purpose of:</p> <ul style="list-style-type: none"> <li>• Managing and assessing job applications</li> <li>• Communicating with candidates</li> <li>• Conducting interviews and selection procedures</li> <li>• Assessing suitability for employment</li> <li>• Carrying out pre-employment checks where legally permitted</li> <li>• Maintaining talent pools (where explicit consent is provided)</li> </ul>
Categories of Personal Data Processed	<ul style="list-style-type: none"> <li>• Depending on the role and recruitment process, we may process:</li> <li>• Name, contact details and identifying information</li> <li>• Curriculum vitae, education and employment history</li> <li>• Interview notes and evaluations</li> <li>• Test or assessment results (where applicable)</li> <li>• Reference information</li> <li>• Video interview recordings (if applicable)</li> </ul>

	<ul style="list-style-type: none"> <li>Correspondence exchanged during the recruitment process</li> </ul> <p>We collect and process only data that is relevant and necessary for assessing your suitability for the role.</p>
Sources of Data	<p>Personal data is collected:</p> <ul style="list-style-type: none"> <li>Directly from you (applications, interviews, communications)</li> <li>From recruitment agencies or platforms acting on your behalf</li> <li>From referees (with your prior knowledge or consent where required)</li> <li>From professional public sources (e.g. LinkedIn), where relevant and proportionate</li> </ul>
Legal Basis for Processing	<p>Processing is carried out under:</p> <ul style="list-style-type: none"> <li>Article 6(1)(b) GDPR – steps prior to entering into a contract</li> <li>Article 6(1)(f) GDPR – legitimate interests in running a fair and effective recruitment process</li> <li>Article 6(1)(a) GDPR – consent (e.g. for talent pools or optional background checks)</li> </ul>
Recruitment Assessments & Automated Tools	<p>Where we use:</p> <ul style="list-style-type: none"> <li>Aptitude tests</li> <li>Skills or personality assessments</li> <li>Video interviews</li> <li>AI-assisted CV screening or candidate ranking</li> </ul> <p>We will inform you in advance, explain the purpose and provide meaningful information on how such tools contribute to the recruitment process. Solely automated decision-making (without human involvement) is not used unless legally permitted and explicitly disclosed.</p>
Background Checks and References	<p>Subject to local law and role requirements, we may carry out:</p> <ul style="list-style-type: none"> <li>Reference checks</li> <li>Employment history verification</li> <li>Criminal record checks (where legally permitted)</li> <li>Right-to-work verification</li> <li>Credit or financial checks for sensitive roles</li> </ul>
Data Retention	<p>We retain your personal data as follows:</p> <ul style="list-style-type: none"> <li>During the recruitment and selection process</li> <li>For unsuccessful candidates: normally up to 2 years unless you consent to longer retention</li> </ul>
Recipients of Personal Data	<p>Your personal data may be shared with:</p> <ul style="list-style-type: none"> <li>HR and recruitment staff in Patria Plc.</li> <li>Hiring managers and interview panels</li> <li>External recruitment and assessment providers</li> <li>Providers of recruitment systems and IT services</li> <li>Adecco Group companies, where they support recruitment activities</li> </ul> <p>All such parties are required to handle your data securely and in accordance with applicable data protection law.</p>
International Transfers	<p>Where personal data is processed or stored outside the EU/EEA, we ensure appropriate safeguards such as:</p> <ul style="list-style-type: none"> <li>Standard Contractual Clauses, or</li> <li>Transfers based on adequacy decisions.</li> </ul> <p>Adecco is responsible for ensuring appropriate safeguards for transfers carried out within its own systems as an independent controller.</p>
Your Rights	<p>You have rights under the GDPR, including:</p> <ul style="list-style-type: none"> <li>Right of access</li> <li>Right to rectification</li> <li>Right to erasure</li> <li>Right to restriction of processing</li> </ul>

	<ul style="list-style-type: none"> <li>• Right to object</li> <li>• Right to withdraw consent (where applicable)</li> </ul> <p>To exercise your rights in relation to our processing, contact: <a href="mailto:security@patriagroup.com">security@patriagroup.com</a></p> <p><b>To exercise any of your rights where you coming to us via Adecco Finland please use the functionalities made available for this in the self-service portal or send an email to <a href="mailto:privacy@adecco.fi">privacy@adecco.fi</a> as the primary contact for candidates and the lead for coordinating responses to data subject requests for the joint processing sections. As we work together with Adecco Finland as joint controllers under Article 26 of the GDPR This means that we jointly determine the purposes and essential means of processing personal data during the early recruitment stages, such as job advertising, application management and candidate pre-screening.</b></p> <p>You may exercise your data protection rights with either in the self-service portal or send an email to <a href="mailto:privacy@adecco.fi">privacy@adecco.fi</a> or send an email to Patria Plc at <a href="mailto:security@patriagroup.com">security@patriagroup.com</a> The essence of our joint controller arrangement, including how responsibilities are allocated between the parties, is available upon request</p>
Supervisory Authority and Complaint Rights Notice	<p>If you have any questions about how we process your personal data, or if you wish to exercise your data protection rights, you can contact our Data Protection Contact at <a href="mailto:security@patriagroup.com">security@patriagroup.com</a>.</p> <p>If you believe that your personal data has not been processed in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") or applicable national data protection law, you also have the right to lodge a complaint with a Supervisory Authority.</p> <p>In particular, you may contact the Supervisory Authority in the country where:</p> <ul style="list-style-type: none"> <li>• You normally live,</li> <li>• You work, or</li> <li>• The alleged infringement of data protection law has taken place.</li> </ul> <p>For individuals located in Finland, the competent supervisory authority is: Office of the Data Protection Ombudsman (Tietosuojavaltuutetun toimisto) P.O. Box 800 00531 Helsinki Finland Email: <a href="mailto:tietosuoja@om.fi">tietosuoja@om.fi</a> Telephone: +358 29 566 6700 Website: <a href="http://www.tietosuoja.fi">www.tietosuoja.fi</a> Please note that contacting our Data protection Contact does not limit your right to lodge a complaint with a supervisory authority.</p> <p>For individuals located in Netherlands the competent supervisory authority is: Netherlands -Autoriteit Persoonsgegevens Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands Website: <a href="https://autoriteitpersoonsgegevens.nl">https://autoriteitpersoonsgegevens.nl</a> Phone number: +31 88 1805 250</p> <p>For individuals located in Belgium, the competent supervisory authority is: Belgium -Autorité de protection des données Website: <a href="https://www.autoriteprotectiondonnees.be/citoyen">https://www.autoriteprotectiondonnees.be/citoyen</a></p>

	<p>Phone number: +32 (0)2 274 48 00 Email: <a href="mailto:contact@apd-gba.be">contact@apd-gba.be</a></p> <p>For individuals located in Sweden, the competent supervisory authority is: Sweden -Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Phone number: +46 (0)8 657 61 00 Email: <a href="mailto:imy@imy.se">imy@imy.se</a></p> <p>Latvia Address: Elijas iela 17, Riga, LV-1050, Latvia Phone: +371 6722 3131 Fax: +371 6722 3556 Email: <a href="mailto:pasts@dvi.gov.lv">pasts@dvi.gov.lv</a> Website: <a href="https://www.dvi.gov.lv/">https://www.dvi.gov.lv/</a></p>
Country-Specific Statement	<p>In Finland, the Netherlands, Belgium and Sweden, and Latvia recruitment-related personal data processing is also subject to national labour law and supervisory authority guidance.</p> <p>We design our recruitment processes to ensure proportionality, transparency and necessity in line with both the GDPR and national employment privacy rules.</p>
Use of AI in the Recruitment Process	<p>As part of the recruitment services provided by Adecco Finland certain AI-enabled features may be used to support candidate management and recruitment efficiency.</p> <p><b>What does this involve?</b> AI tools may assist with:</p> <ul style="list-style-type: none"> <li>• CV parsing and structuring</li> <li>• Matching candidates to job requirements</li> <li>• Ranking or prioritization of applications</li> <li>• Identifying potential skills based on CV content</li> </ul> <p>These tools support recruiters and hiring managers in making more consistent and efficient decisions. Final hiring decisions are always made by human recruiters. Where AI tools are used we generally rely on our legitimate interests in conducting efficient, fair and consistent recruitment (Article 6(1)(f) GDPR), balanced against your rights and freedoms.</p> <ul style="list-style-type: none"> <li>• In some circumstances, processing may also be necessary to take steps at your request prior to entering into an employment contract (Article 6(1)(b) GDPR).</li> </ul>
Safeguards and Rights in Relation to AI	<p>We apply specific safeguards, including:</p> <ul style="list-style-type: none"> <li>• Human oversight of all recruitment decisions</li> <li>• Regular bias and discrimination risk testing</li> <li>• No intentional use of special category data for AI decisioning</li> <li>• Technical and organizational security measures</li> <li>• Governance aligned with emerging EU AI Act requirements</li> </ul> <p>Where any form of fully automated decision-making with legal or similarly significant effects is introduced, you will be informed and provided with your rights under Article 22 GDPR, including the right to request human intervention.</p>
Updates to this Notice	<p>This notice may be updated from time to time Last updated November 27th, 2025</p>