

RECRUITMENT PRIVACY NOTICE

1 ABOUT THIS NOTICE

Elisa Corporation and its affiliates (*'Elisa Group', 'we', 'our', or 'us'*) respect your privacy and are committed to protecting the personal data of job applicants and potential employees (*'you', 'applicant', or 'candidate'*). This Recruitment Privacy Notice (*'Privacy Notice'*) explains how and why we collect, process, and store your personal data during the recruitment and talent acquisition process, including when you apply for a job, attend a recruitment event, or participate in recruitment-related assessments.

For purposes of this Privacy Notice, *'personal data'* refers to any information relating to an identified or identifiable natural person. *'Processing'* includes any activity performed on personal data, such as collection, recording, organizing, structuring, storing, adapting, retrieving, consulting, using, transferring, disclosing, restricting, erasing, or destroying. These and all other terms have the same meaning as in the General Data Protection Regulation.

This Privacy Notice details what personal data we process, the reasons for processing your personal data, how long your data will be retained, and your rights regarding your personal data, including how to access, correct, or delete it. It also provides information about who to contact if you have questions or concerns about your personal data processing.

Please note that this Privacy Notice applies specifically to recruitment-related processing activities. It does not cover personal data that you

may provide to Elisa Group Companies when interacting with us outside the recruitment process—for example, when using our products or services. For those interactions, please refer to our the applicable privacy notice of the relevant Elisa Group Company.

Should your application be successful, your personal data will subsequently be processed in accordance with a separate employee privacy notice provided to you upon entering employment with Elisa.

This Privacy Notice is designed to encompass all our global recruitment-related personal data processing activities. However, local data protection laws and regulations may impose additional or varying requirements or limitations, and local supplementary notices may be provided where applicable.

The data controller responsible for the processing of your personal data under this Privacy Notice is Elisa Corporation or one or more of its respective affiliates (each, an *'Elisa Group Company'*) conducting the recruitment process (for Elisa Group Company details and further clarification, please refer to section 8, *'Data Controller and Contact Information'*).

We regularly review and, when necessary, update our data protection policies and practices to ensure compliance with applicable data protection laws.



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2 WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

During our recruitment and talent acquisition processes, Elisa collects and processes various categories of personal data. This data includes information provided directly by you as well as information obtained from other sources. We only process personal data necessary to evaluate your suitability for a role and manage our recruitment processes effectively.

Providing your personal data is voluntary; however, if you choose not to provide certain information, we may be unable to proceed with your application or respond effectively to your inquiries.

The categories of personal data described below in Sections 2.1 and 2.2 are processed only when relevant and applicable for the specific recruitment process in question.

2.1 Information Collected Directly from You

Basic Identification and Contact Information:

- Name, date of birth, nationality, and personal ID number (or equivalent, where applicable)
- Home address, email address, and phone number
- Photograph (if included in your application or provided during recruitment)

Professional Background, Skills, and Qualifications:

- Your CV/resumé, cover letter, and application forms
- Professional experience details, including current and past employers, job titles, and duration of employment
- Education history, degrees, diplomas, certificates, and relevant courses or training
- Language skills and other competencies
- Licenses, certifications, and professional qualifications
- Publications, patents, or other professional achievements

Information Pertaining to the Recruitment Process:

- Notes and evaluations from interviews conducted by Elisa recruiters or hiring managers
- Pre-recorded video material within the application process
- Recorded video material from the interview (only with separate notification and consent)
- Results and scores from aptitude tests, skills assessments, or psychological evaluations carried out during the recruitment process
- Communication preferences (such as preferred language and contact method)



Information Relating to Eligibility and Administration:

- Information regarding your right to work (such as citizenship, work authorization, visa status, health status)
- Voluntary diversity and inclusion data, including gender identity, ethnicity, or disability status (provided voluntarily for statistical and inclusion purposes only and anonymized when feasible)
- Any special accommodations requested due to disabilities or health conditions during the recruitment process

Other Information You Voluntarily Provide:

- Willingness to relocate, salary expectations, employment preferences, hobbies, or interests
- Any additional information provided by you in application materials or during interviews

2.2 Information Collected from Other Sources:

Reference and Background Checks:

- Information from references (such as employment history verification, professional reputation, qualifications, and performance)
- Educational verifications from institutions attended (such as confirmation of degrees, certifications, attendance)
- Information from professional licensing or certification bodies
- Background checks and security clearances, including criminal records, credit checks, drug tests and vetting processes, where permitted or required by law and relevant to the role for which you are applying

Information from Publicly Accessible Sources:

- Professional profiles available publicly on social media and professional networking sites (e.g., LinkedIn)
- Publications or publicly available professional information relevant to the job role

Technical Data Collected Through Online Platforms:

- When you apply through our website, we may collect technical data such as IP addresses, device identifiers, usage information, browser type, access times, pages visited, and interactions with online services. In some cases, third party (the provider of the online platform) may act as the independent controller.



Additional Sources of Personal Data:

- Personal data provided by third-party recruitment agencies or head-hunters involved in your application process (where applicable).
- Personal data received from operators of external applicant platforms used during the recruitment process (where applicable).

Any sensitive personal data (such as data related to your health, ethnicity or political views or other protected attributes) is processed only to the extent you provide such information to us during the recruitment process. Sensitive data is processed according to legal requirements, only to accommodate specific needs during recruitment, ensure workplace health and safety, or fulfil legal obligations. Otherwise, we kindly ask that you avoid submitting information that may qualify as sensitive personal data.

The exact scope of personal data processing may vary depending on your jurisdiction, the role applied for, and applicable local laws and regulations.



3 FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS IS YOUR PERSONAL DATA PROCESSED?

The information that you provide us (see Section 2.1) or that we obtain from other sources (see Section 2.2), will be used for Elisa's global personnel recruitment, management and planning purposes, as permitted by applicable law. Where the collection or processing is based on your consent, you may withdraw your consent at any time to the extent permitted by applicable law. This will not affect the validity of the processing prior to the withdrawal of consents to above.

The following chart contains information about how we use personal data and the legal bases for such use. Please note that one or more purposes may apply simultaneously.

Purpose of Processing	Legal Basis for Processing
Evaluating and selecting candidates	Necessary for entering into an employment contract (steps before concluding a contract)
Managing and administering the recruitment process (including scheduling interviews, assessments, and communicating with applicants)	Necessary for entering into an employment contract (steps before concluding a contract). Legitimate interests in ensuring efficient, fair, and transparent recruitment procedures
Verifying qualifications and conducting reference checks	Consent of the applicant (particularly when contacting provided referees)
Performing background checks (e.g., criminal records, credit checks) when relevant to the role and permitted by law	Consent of the applicant
Facilitating communication and responding to applicant inquiries	Necessary for entering into an employment contract (steps before concluding a contract)
Maintaining records of the entire recruitment process and ensuring compliance with legal requirements (e.g., applicable equal opportunity legislation and responding to legal claims)	Compliance with applicable legal obligations. Legitimate interests in protecting against legal claims (processing the data for purpose of evidence)



Improving our recruitment processes through analytics, statistical evaluations, and anonymized reporting

Legitimate interests in enhancing the effectiveness and fairness of our recruitment practices and improving candidate experiences

Considering applicants for future positions (Talent Pool)

Consent of the applicant willing to opt-in for consideration for future openings

Please note that if you provide us with personal data of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing their personal data to us.



4 HOW LONG IS YOUR DATA PROCESSED?

We retain your personal data only for as long as necessary to fulfil the purposes described in this Privacy Notice and in accordance with applicable laws and regulations. Once processing is no longer necessary, your personal data is securely deleted or where applicable, anonymized.

4.1 General Retention Period in Designated Application Systems

If your application does not result in employment with Elisa Corporation or an Elisa Group Company, your personal data will typically be retained for between **six to twelve months** depending on the local legislation following the conclusion of the recruitment process. This retention period allows us to respond to potential legal claims, such as those relating to local non-discrimination and equality legislation.

4.2 Extended Retention Based on Consent (Talent Pool)

With your explicit consent, your personal data may be retained for future recruitment opportunities for up to **twenty-four months** from the conclusion of the recruitment process. You have the right to withdraw your consent at any time, after which your personal data will be promptly deleted or anonymized.

4.3 Retention Period through other Application Channels

For applications submitted through channels other than our designated application systems, we instruct all relevant colleagues to refer applicants to our Designated Application Systems and to delete your information after the conclusion of the recruitment process at the latest.

4.4 Legal Obligations and Claims

In specific circumstances, we may retain personal data for longer periods if legally required or necessary to establish, exercise, or defend legal claims. In such cases, retention will continue only as long as required by applicable laws or until the resolution of any relevant legal matters.

If you are successful in your application and become employed by Elisa or one of our affiliates, your personal data will be retained according to our separate employee privacy notice and applicable employment laws.

You may contact us for further information on specific retention periods applicable to your personal data or to request deletion where appropriate.



5 WHO HAS ACCESS TO YOUR PERSONAL DATA?

5.1 Recipients of Personal Data

Your personal data will be treated confidentially. Within Elisa Group, your personal data is accessible only to authorized personnel who require it to perform their duties in connection with recruitment and talent acquisition.

We may share your personal data with the following categories of recipients, strictly to the extent necessary and for the purposes described in this Privacy Notice:

Elisa Group Companies

Your data may be shared within Elisa Group to manage recruitment processes effectively across the Elisa Group. Sharing within Elisa Group helps us coordinate our recruitment practices, maintain consistency, and identify suitable job opportunities for candidates across our various entities.

External Service Providers and Partners

We engage external service providers to assist us with certain aspects of recruitment. These external parties include:

- Operators of recruitment platforms and applicant management systems.
- IT service providers (e.g., hosting providers, maintenance and support providers, and data storage providers).
- Providers of aptitude assessments or psychometric testing.
- External recruitment agencies and consultants assisting with candidate screening and selection.
- Providers responsible for securely destroying documents or electronic data when no longer required.

External providers process your data on our behalf strictly in accordance with our instructions and applicable data protection laws. Where necessary or legally required, these external providers may act as independent data controllers.

Authorities and Legal Disclosures

We may disclose your personal data to governmental authorities, courts, or law enforcement agencies when legally required, for example in response to legal requests, court orders, or to comply with statutory obligations (e.g., equal opportunity or anti-discrimination laws).

Personal data may also be disclosed when necessary to protect Elisa's legitimate interests in legal proceedings or investigations.



Mergers and Business Reorganization

In the event of mergers, acquisitions, divestitures, reorganizations, or similar corporate transactions involving Elisa Group, your personal data may be disclosed to third parties involved (such as potential buyer companies) to facilitate such transactions. We will take appropriate measures to ensure confidentiality and protection of your personal data throughout any transaction.

5.2 International Transfers of Personal Data

Although your personal data is primarily stored and processed within the European Union (EU) and European Economic Area (EEA), some of our recruitment-related systems, providers, or activities may involve transferring your personal data to countries outside the EU/EEA ("third countries").

Such transfers typically occur in the following circumstances:

- When recruitment systems, databases, or platforms used by Elisa Group are hosted or operated by providers located outside the EU/EEA.
- When data processing is necessary at Elisa Group Companies located outside the EU/EEA, for example, in connection with international recruitment or global talent management.
- When external providers or agencies engaged by us operate or maintain facilities outside the EU/EEA.

We recognize that third countries outside the EU/EEA may have different standards regarding the protection of personal data. Therefore, whenever your personal data is transferred internationally, Elisa ensures compliance with applicable data protection laws, including implementing appropriate safeguards and protective measures to maintain the security of your personal data (for instance, Standard Contractual Clauses).

You have the right to request further information regarding these safeguards or obtain copies of the documents used to protect your personal data when transferred outside the EU/EEA. For inquiries or to receive additional details, please contact us as provided in Section 8 of this Privacy Notice ("Data Controller and Contact Information").



6 AUTOMATED PROCESSING OF APPLICATIONS

In certain jurisdictions, we may use data analytics and algorithms to help us to review the large quantities of candidates and application data that we receive. During the recruitment process, we may use recruitment systems that include features powered by artificial intelligence (AI) or large language models (LLMs), such as those provided by our applicant management system provider.

These features are designed to support and enhance the recruitment process—for example, by generating summaries, feedback drafts, or helping organize candidate information based on structured recruiter input. However, we do not conduct automated decision-making procedures within the definition of Art. 22 GDPR, i.e. the decision regarding your application is not solely based on automated processing. All decisions with legal or similarly significant effects on applicants are made by human recruiters.

In certain cases, automated tools may be used to assist in sorting and prioritizing application materials based on objective, role-specific criteria (e.g., required certifications or language skills). If a position requires mandatory qualifications and these are not met, the system may flag or exclude the application based on those specific parameters. However, every candidate's application is ultimately assessed by a recruiter, and decisions are never made without human review.



7 YOUR RIGHTS

You have certain rights regarding the processing of your personal data under the General Data Protection Regulation. Below we explain these rights and how you can exercise them.

7.1 Right to Access

You have the right to obtain confirmation from us as to whether we process personal data concerning you. Upon your request, we will inform you of the specific personal data we hold about you, the purposes for which we process this data, the recipients or categories of recipients to whom the data is disclosed, and the retention periods.

7.2 Right to Rectification

You have the right to request the correction of inaccurate personal data or completion of incomplete personal data that we hold about you. We encourage you to promptly inform us if your data requires updating or correction.

7.3 Right to Withdraw Your Consent

If you have provided consent for the processing of your personal data, you may withdraw it at any time. Please note that withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

7.4 Right to Object

You have the right to object, at any time, to processing of your personal data which is based on our legitimate interests. When you raise an objection, we will cease processing your data unless we can demonstrate compelling legitimate grounds for processing that override your interests, rights, and freedoms, or the processing is necessary for establishing, exercising, or defending legal claims.

7.5 Right to Erasure

You have the right to request the erasure of your personal data in certain circumstances, such as:

- your personal data is no longer necessary for the purposes for which it was originally collected or processed;
- you have withdrawn consent on which processing is based and no other legal basis remains;
- you object to processing and no overriding legitimate grounds for processing exist;



- your personal data has been unlawfully processed.

Please note that we may be obligated to retain certain data due to legal requirements or for establishing, exercising, or defending legal claims.

7.6 Right to Restriction of Processing

You have the right to request the restriction of processing of your personal data in the following cases:

- You contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data;
- The processing is unlawful, and you oppose the erasure of your personal data and request restriction instead;
- We no longer need the data, but you require it for establishing, exercising, or defending legal claims;
- You have objected to processing based on legitimate interests, pending verification whether our legitimate grounds override yours.

7.7 Right to Data Portability

Where processing is based on consent or contract and carried out by automated means, you have the right to receive your personal data in a structured, commonly used, and machine-readable format, and the right to transmit this data to another controller.

7.8 How to Exercise Your Rights

To exercise any of the rights described above, please contact us using the contact details provided in Section 8 of this Privacy Notice ("Data Controller and Contact Information"). We will respond to your request within one (1) month of receipt, unless there is a justified reason to extend this period by two (2) further months. We will always inform you if such an extension is necessary and explain the reasons.

If we cannot fulfil your request due to legal obligations or other legitimate grounds, we will inform you promptly, clearly stating the reasons.

7.9 Right to Lodge a Complaint

We encourage you to contact us directly if you have any concerns about or wish to raise a complaint or provide suggestions regarding the processing of your personal data. You can find our contact details below in Section 8 of this Privacy Notice.



If you are not satisfied with our processing of your personal data, you have the right to lodge a complaint with the supervisory authority in the country where you submitted your job application. You can find the relevant authority's contact information by visiting the official website of the national data protection authority.



8 DATA CONTROLLER AND CONTACT INFORMATION

The data controller responsible for the processing of your personal data under this Privacy Notice is Elisa Corporation or the Elisa Group Company to which you submit your job application. This means that Elisa Corporation or the relevant Elisa Group Company determines the purposes and means of processing your personal data in connection with that specific recruitment process.

In most cases, the Elisa Group Company acts independently as the data controller. Where recruitment activities involve joint processes or shared systems across the Elisa Group, Elisa Corporation may act as a joint controller together with at least one additional Elisa Group Company. In such cases, the controllers jointly determine the purposes and means of the processing.

8.1 Data Controller within Elisa's Finnish Business Units

Elisa Corporation, Fonum Oy Ab, Elisa Santa Monica Oy, Fenix Solutions Oy and Elisa IndustriQ Finland Oy:

	Per E-Mail	Per Post
Recruitment related inquiries	rekrytointi(@)elisa.fi	See relevant business address below.
Data protection concerns to our Data Protection Officer and Coordinators	tietosuojaavastaava(@)elisa.fi	Data Protection Officer / Elisa Oyj P.O. Box 1 00061 Elisa Finland

Additional contact details can be found at <https://elisa.com/corporate/about-elisa/contacts/>.

8.2 Data Controller within Elisa Group's Business Units outside Finland

8.2.1 camLine

	Per E-Mail	Per Post
Recruitment related inquiries	jobs(@)camline.com	See relevant business address below.
Data protection concerns to our Data Protection Officers and Coordinators	privacy(@)camline.com	Data Protection Officer / camLine Fraunhoferring 9 85238 Petershausen Germany

An overview of all data controllers responsible for the data processing within the business unit camLine can be found at: <https://www.camline.com/contact>.



8.2.2 Elisa Polystar

	Per E-Mail	Per Post
Recruitment related inquiries	Careers(@)elisapolystar.com	See relevant business address below.
Data protection concerns to our Data Protection Officers and Coordinators	DPO(@)elisapolystar.com	Data Protection Officer / Polystar Hammarby Allé 21 SE-120 32 Stockholm Sweden

An overview of all data controllers responsible for the data processing within the business unit Polystar and further contact information can be found at: <https://elisapolystar.com/contact-us/>.

