Privacy Notice: Recruitment

This is a privacy notice that is based on Articles 13 and 14 of the EU's General Data Protection Regulation.

Controller

Turku University of Applied Sciences Ltd

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Person in charge and contact persons

Mervi Raita, Head of HR Services

Mirva Virtanen, Recruitment and HR Advisor

Contact information of Data Protection Officer

Please contact in all data protection related matters:
tietosuoja@turkuamk.fi

The messages sent to this address are processed by the Data Protection Officer (DPO) and a data protection specialist working with them and as their substitute.

Purpose of processing personal data

Personal data is processed to carry out the recruitment process. This covers

- processing job applications
- communication with candidates
- job interviews
- drafting an employment contract for the candidate selected for the position

- a possible background check for the candidate selected for a position in a sensitive research field
- verification of the right to work of all foreign nationals selected for a position
- checking the extract from the criminal records and/or requesting for a drug test result when the legislation so requires
- any other recruitment actions, such as potential aptitude tests, or drug testing when the position so requires.

Legal basis for processing personal data

The legal basis for processing personal data depends on the data and the stage of the recruitment process.

- The primary legal basis for processing personal data in recruitment is operations performed prior to entering a contract.
- The legal basis for processing personal data is the legal obligation of the controller
  - in processing the extract from the criminal records and drug test results
  - in the verification of the right to work of a foreign national
  - in reporting recruitment data for the annual data acquisition by the Finnish Ministry of Education and Culture (OKM).
- Personal data obtained through applications and aptitude tests may be processed with the person's consent in other corresponding recruitment processes and when collecting feedback on the recruitment process.
- The possible background check is only carried out by a separate consent of the selected candidate; the legal basis for processing personal data acquired in the context of the background check is operations performed prior to entering a contract.

Legitimate interest of the Controller or third party

It is a shared benefit of both parties that the organization can process the applicant's personal data in appropriate ways to carry out recruitment.

Processed categories and storage times of personal data

The personal data that is processed includes

- the candidate's basic information
- information on the candidate's work experience and education
- other information needed for the recruitment and other information provided by the candidate in the course of the process.

The gender data of applicants is only processed for statistical purposes by the request of the Finnish Ministry of Education and Culture (OKM).

In normal recruitment, the information is automatically deleted after two years from closing the recruitment, and in open application recruitment, after two years from editing the application or upon request.

The application of the candidate selected for the open position will be permanently stored in Turku UAS systems as part of the other documentation related to setting up the employment relationship.

Recruitment permission forms are stored for 5 years as of announcing the result of the selection process to candidates.

The data collected for the AMKOTA reporting for the Finnish Ministry of Education and Culture are stored for 7 years starting from the reporting deadline due to potential audits.

The background information form filled in by the selected candidate in the context of a research security background check is retained as part of the material related to establishing the employment relationship for the entire duration of the employment and for two years after its termination. If no employment relationship is established, the form and the data collected in the

context of the background check will be deleted once the limitation periods related to the decision have expired.

The documentation related to the verification of a foreign national's right to work in Finland is stored in accordance with the Aliens Act (301/2004).

Other collected data will be stored for as long as the candidate remains involved in the process. Considering the periods for court proceedings in the context of recruitment, the data shall be deleted after two years from the selecting a candidate for the position within the recruitment in question and informing other candidates about the selection. The data may, however, be stored for longer than two years in case there are any related unfinished complaints or court proceedings.

Regular information sources

The information is collected directly from the candidates. Referees named by the candidate may also be used as information sources.

In the background checks carried out when recruiting for a position that is strongly linked to a sensitive research field, Turku UAS collects data, with the candidate's consent, from the portal by the Suomen Asiakastieto and from other possible registers.

Receivers or receiver groups of personal data

In recruitment, Turku UAS uses the Kuntarekry platform through which the candidates submit their information. In terms of Kuntarekry, the processing of personal data is announced in their own privacy notices at https://www.kuntarekry.fi/

The data processed during the recruitment process is disclosed only to those involved in the decision-making process and those employees whose work contains processing this data.

Based on the Finnish Act on Openness of Government Activities, data on candidates may be disclosed to a limited extent upon request.

Recruitment data is annually delivered to the Finnish Ministry of Education and Culture (OKM) for statistical purposes.

In connection with background checks for positions in critical research fields, third-party service providers may be used on a case-by-case basis. In such cases, the information required for conducting the background check will be disclosed to a third party.

Essential information regarding transfer of data to third countries (outside the EU or EEA countries)

Turku UAS does primarily not transfer the personal data to third countries.

In connection with background checks for positions in critical research fields, personal data may be transferred to third countries if the affiliations, employment history, or educational background being verified are located in such countries.

Principles of data protection of the register

The data can only be accessed by those whose work requires it. The access is restricted through limited user rights.

Data subject rights

In accordance with the EU's General Data Protection Regulation, the data subject has the right to

- obtain information on the processing of their personal data unless otherwise prescribed by law
- review their personal data and rectify incorrect or missing data
- have their personal data erased (not applicable when the legal basis for processing personal data is the Controller's legal obligation or a task carried out in the public interest or the exercise of public authority)

- restrict the processing of their personal data
- object the processing of their personal data when the legal basis for processing personal data is public or legitimate interest
- ask for the personal data they have submitted themselves to be transferred from one controller to another when the legal basis for processing personal data is consent or contract
- cancel their consent
- not be subject to automated decision-making (the data subject may permit automated decision-making through giving their consent).
- In addition, the Controller has the obligation to report cases concerning rectification and erasure of personal data and restriction of processing personal data.

No profiling is carried out on the basis of personal data.

Our purpose is to describe the processing of personal data as extensively and transparently as possible in this privacy notice and we aim to develop the content of the notice. We will notify of significant changes in accordance with what is required by law.

The data subject may use their rights by contacting the contact person or DPO listed in the beginning of the privacy notice. More information concerning the rights of the data subject can be acquired from the contact person and/or DPO.

If processing of personal data does not require identification of the data subject without further information and the Controller cannot identify the data subject, the right to review, rectify, erase or transfer personal data and the right to restrict the processing of personal data are not applied and thus the Data Controller is not subject to the related reporting obligation.

The data subject has the right to file a complaint to the Office of the Data Protection Ombudsman if they think that the processing of their personal data conflicts with the valid data protection legislation. Contact details of the Turku UAS Data Protection Officer can be found in the beginning of the privacy notice.