

## Privacy notice for job applicants

Huhtamäki Oyj and its subsidiaries, associated companies and other affiliates (later referred to as “Huhtamaki” or “Group”) respects the privacy of its job applicants. This privacy notice (“Privacy Notice”) describes the measures Huhtamaki takes to ensure the privacy and security of information collected and processed by Huhtamaki.

### 1 Data controller

In respect of each data subject’s personal data, the data controller is regarded to be the Huhtamaki group company or independently each group company organising the recruitment (please, see further information under section 4). The data controller may, thus, be either Huhtamäki Oyj (business ID 0140879-6) or any of its subsidiaries, associated companies or other affiliates.

Other entities within the Group, including Huhtamäki Oyj, may in certain cases act as data controller independently with respect to personal data processed for the purposes of planning, management, reporting and/or control of cross border or group level operations.

For avoidance of doubt, in this Privacy Notice “we” or “Huhtamaki” shall refer to any Huhtamaki group company acting as the data controller in each individual case.

### 2 Contact details for Huhtamaki in matters concerning this Privacy Notice

Where the data subject has questions regarding this Privacy Notice or he/she wishes to exercise his/her rights, the data subject should contact the Huhtamaki group company, which is organising the recruitment.

Contact details for all Huhtamaki group companies can be found on Huhtamaki’s website at <https://www.huhtamaki.com/contact-us/>.

### 3 Lawfulness of processing personal data

Processing of the personal data is based on the data controller’s legitimate interest to process personal data for the purposes of recruiting as well as the connection between Huhtamaki and the applicant participating in the recruiting process. For some parts, processing of the personal data is also necessary for the purposes of preparing the employment contract or offer. In some cases, Huhtamaki may be required to collect certain information in order to fulfil its statutory obligations.

In addition, local legislation may set additional requirements for the data controller to acquire the applicant’s consent for processing of certain type of personal data or for conducting of certain processing activities. For instance, consent can be requested for conducting aptitude assessments and background checks.

## 4 Purposes for processing of personal data

Personal data is processed for purposes of receiving and handling of applications from job applicants for recruitment and selection purposes. These applications can be open applications or intended for a certain specific job opening. In such cases Huhtamaki may also consider job applications for other similar positions within the Group, as applicable. The job applicant has a right to object to such further processing of his/her application. The applicants filing the job applications can be internal (i.e. Huhtamaki's current employees) or applicants not currently employed by Huhtamaki.

Huhtamaki may also process personal data to fulfil Huhtamaki's statutory obligations. Such obligations may relate to e.g. proving that the recruitment decisions have been non-discriminatory.

Huhtamaki may outsource certain data processing activities to third parties, in which case such third party processors are processing personal data on behalf of Huhtamaki. For instance, the data may be processed by external recruitment consultants who are handling applicant screening, assessments and otherwise supporting Huhtamaki in the recruitment process or the IT/operational management on-line application system may be outsourced to an external IT supplier.

## 5 Categories of personal data we process

Following information may be obtained from job applicants applying for a job at Huhtamaki:

- Personal information, including name, contact information, date of birth and other similar information necessary for identifying applicants and verifying eligibility to work;
- Documents and other materials provided by the job applicant, such as a cover letter, CV (including e.g. applicant's education and work experience information, language skills, expertise, references etc.), certificates;
- Possible suitability questionnaires and self-evaluation records;
- Potential other similar/relevant application-related information (such as applicant assessment reports by recruitment consultants) which the job applicants may want to disclose to Huhtamaki in connection with their job application; and
- Subject to the applicable laws and regulations and applicants' consent, background check information, such as information obtained through security clearances or similar information sources.

Personal data is only processed to the extent necessary in relation to the nature and type of the position the job applicant is considered for and related duties.

If the job applicant does not wish to provide Huhtamaki with the requested personal data, Huhtamaki may not be able to consider the job applicant in the recruitment process.

## 6 Regular sources of information

In general, Huhtamaki receives the personal data processed in recruitment process from the job applicant him/herself. Job applicant sends application or resume via electronic recruitment tool

or by email to Huhtamaki or to an agency acting on behalf of Huhtamaki, and that way registers as an applicant. Job applicant may also initiate interest to Huhtamaki in LinkedIn, by clicking “Apply” or “I’m interested” for jobs advertised in or via LinkedIn.

Subject to the job applicants’ consent, information may also be obtained from other sources, such as referenced persons and recruitment consultants interviewing applicants and handling applicant assessments as a part of the recruitment process. Also, subject to the applicable laws and regulations and applicants’ consent, information may be obtained through background checks, security clearances and other similar information sources deemed necessary due to the nature and security requirements related to the open position in question.

## 7 Data retention

Huhtamaki actively processes the personal data of the applicants during the recruitment process. The job applicant’s personal data is stored for 12 months after the latest update by the applicant (at Workday Candidate Home page) for recruitment purposes, unless the applicant is prior chosen for a position. In addition, the data is also stored for purposes of fulfilling Huhtamaki’s rights and obligations and for handling possible claims for 12 months, unless it is necessary to store the data longer for such purposes. Retention times are described in company’s applicable record retention guidelines.

If the job applicant wishes to have more information regarding the retention times, the job applicant should contact Huhtamaki as instructed in section 2 of this Privacy Notice.

If an applicant is chosen for the position, the basic information of the respective applicant as well as other information relevant for the employment relationship shall be transferred to Huhtamaki’s employee information register.

## 8 Regular data disclosure

The personal data of the job applicant is accessed by Human Resources professionals and by other persons who participate in the selection process at Huhtamaki. Huhtamaki may share personal data of the job applicant globally between the different entities within the Group and may also consider the job application for other similar positions, as applicable. The job applicant has a right to object to such further processing of his/her application. Further, Huhtamaki uses the services of third party service providers to perform tasks related to the job applicant’s personal data. Such services may include e.g. processing activities conducted by external recruitment consultants, assessment partners and background check providers. Huhtamaki may share personal data with such third party service providers who process personal data on behalf of Huhtamaki and in accordance with the instructions of Huhtamaki.

## 9 Data transfers from EU/EEA

Personal data can be transferred outside the EU/EEA in accordance with applicable data privacy laws and regulations and subject to the restrictions set in said laws and regulations.

- The locations of Huhtamaki group companies (also outside the EU/EEA) can be found on Huhtamaki’s website at <https://www.huhtamaki.com/contact-us/>.

- Some of Huhtamaki's service providers may also be located outside the EU/EEA, including the United States.
- When personal data is transferred outside the EU/EEA to a country, which does not guarantee adequate level of data protection, Huhtamaki will use appropriate safeguards, such as EU Commission's standard contractual clauses or Privacy Shield Framework, in accordance with applicable data privacy laws and regulations. The job applicant can obtain information of these safeguards by contacting Huhtamaki. Contact information can be found from section 2 of this Privacy Notice.

## 10 Data security

### Manual material

Possible manual material is stored in locked spaces, access to which is only granted to people with a valid need to access the data.

### Data processed electronically

Huhtamaki's IT systems are protected against unauthorised access with various data protection functions, including technical measures to prevent and detect any safety breaches that may threaten the personal data. Huhtamaki applies customary authorisation processes, e.g. individual access rights and passwords. Access is allowed only for such persons who have a legitimate need to access the personal data. In case of outsourced data processing activities, Huhtamaki protects the data security by applying appropriate confidentiality and other clauses in the outsourcing agreements

## 11 Data subject's rights

Job applicants have rights with regards their personal data, including:

- **Right of access** – you are entitled to have information concerning the personal data that is processed as well as a copy of such data.
- **Right to rectification** – you have a right to have inaccuracies related to your personal data corrected.
- **Right to erasure** – you have the right to require the data controller to delete your personal data if the continued processing of that data is not justified.
- **Right to withdraw consent (when processing is based on consent)** – in order for a consent to be valid, it needs to be withdrawable, and the individual has the right for such withdrawal at any time.
- **Right to data portability** – under certain conditions, you may require your personal data to be ported to yourself or to another company in a commonly used machine-readable format.
- **Right to object** – You have the right, on grounds relating to your particular situation, to object to processing if the processing is based on legitimate interest.

- **Right to restrict processing** – you have, in some situations, the right to limit the processing of your data to some purposes. This means that we must refrain from using the data during the period for which the right applies. This right may be used e.g. if you contest the lawfulness of the processing or the accuracy of the data, and we are in the process of verifying the accuracy of the data.
- **Right to lodge a complaint with the supervisory authority** – you have the right to lodge a complaint with the competent supervisory authority as described in the local laws and regulations.

## 12 How you can contact us and exercise your rights

You can contact us regarding all questions concerning protection of your personal data in our data processing activities. You can find our contact information from section 2 of this Privacy Notice.

You can also exercise your rights, free of charge, by contacting us. We will answer your request within one (1) month of receipt of your request, unless there are justified causes to extend this time by two (2) further months. If we cannot fulfil your request, e.g. due to legal obligations, we will inform you in writing within the same time period stated above and provide you the reasons due to which we are unable to fulfil your request. In this case, you can always lodge a complaint with the supervisory authority, if you disagree with our decision.

## 13 Changes to Privacy Notice

Huhtamaki may amend this Privacy Notice from time to time. While we will aspire to inform you of any significant changes to this Privacy Notice, you are encouraged to regularly visit our website and review the notice for updates.

Last updated: March 2019