

Estonian Label House

Employee & Recruitment Privacy Policy

1. General Information

As the data controller, Estonian Label House OÜ ("Estonian Label House", "we" or "us") is fully committed to protecting your individual rights and keeping your personal data safe as required by The General Data Protection Regulation (EU) 2016/679 ('GDPR') and national data protection legislation.

In this Privacy Policy, we describe why and how we collect, use and retain personal data on our employees and job applicants. This Privacy Policy also describes which rights you have as the data subject, and how to use those rights.

2. Contact Details

The contact details of the data controller are:

Estonian Label House OÜ
Õpetajate tn 5, Kohtla-Järve, 31021 Estonia
Erik Björkenheim
erik.bjorkenheim@nordiclabel.fi

3. Group of Data Subjects

Persons employed or applicants taking part in recruitment processes by Estonian Label House and contingent workers performing assignments for Estonian Label House.

4. Purpose and Legal Basis of Processing Personal Data

Estonian Label House only processes personal data that is necessary for specific, explicit and lawful purposes relating to the recruitment procedure and employment relationship. In practice, these purposes include the following:

- **Recruitment and employee onboarding**, which is based on the performance and entering into the employment agreement
- **Background security clearance of job applicants** (for certain positions), which is based on Estonian Label House's legitimate interest to collect information on job applicants, evaluate them and select a suitable candidate during recruitment
- **Fulfilling our responsibilities under the employment agreement**, such as the administration of salary payment and employee benefits. Such processing is based on the performance of the employment agreement
- **Working time recording and management**, which are based on the performance of the employment agreement, compliance with our legal obligations and Estonian Label House's legitimate interest to ensure reliable and efficient workforce and working time management.
- **Administering employee claims and the termination of employment**, which is based on the performance of the employment agreement
- **Providing access to the IT applications** needed to perform your tasks, which is based on the performance of the employment agreement
- **Administration of the employment relationship lifespan and management of work performances**, which is based on the performance of the employment agreement

- **Workforce management, planning and analysis** including remuneration and compensation policies and analysis, performance reviews and competence development. This processing of employee data is based on Estonian Label Houses legitimate interest to ensure reliable and efficient management of HR and benefit schemes
- **Development of the employees**, including training and career planning, which is based on Estonian Label Houses legitimate interest to ensure reliable and efficient HR management and professional learning of its employees
- **Ensuring security of premises as well as network and information security** (incl. camera surveillance, access control, virus protection, firewalls, technical surveillance such as automatic filtering and scanning of e-mail traffic, log management), which is based on Estonian Label House's legitimate interest to ensure the safety and security of its premises and IT systems. Also deviant actions in the IT-environment are scanned on a general level.
- **Reporting employee data to tax authorities and other authorities**, which is based on the fulfilment of Estonian Label House's legal obligations
- **Sick leave administration**, which is necessary for the compliance with our legal obligations
- **Publishing photographs of staff**, which is based on your consent

5. Categories of personal data

Estonian Label House processes especially the following main categories of personal data for the above-mentioned purposes:

Personal data relating to the recruitment processes

- Application, CV
- Education, diplomas and certificates
- Work experience
- Permissions and permits
- Background security clearance information (for certain positions)
- Talent evaluation and management data

Basic personal data

- Name
- Employee ID
- Contact information (e.g. telephone, e-mail, address)
- Social security number/date of birth
- Nationality
- Education
- Photographs

Information concerning the employment, salary and pensions

- Salaries and other compensation data such as fringe benefits and bonus entitlements
- Banking details such as bank account
- Taxation information
- Benefits and allowances
- Vacations
- Days of illness

- Working time
- Absences (e.g. family leave, alternation leave, secondment, study leave and other types of leave)
- Pension information
- Working time recordings
- Basic employment data (e.g. duration and form of employment, position, grade etc.)
- Personal appraisal and development discussion information, individual development plans
- Training information
- Additional information (e.g. employment history, educational background, CV etc.)

Data on employees' electronic communication, internet, phone

- Data on mobile phone use
- System logs

Employees' travel information

- Travellers' contact information
- Information regarding work related travels (e.g. bookings and flight information)

Employees' medical data

- Certificate of illness
- Information on absence due to illness, long term sick leave
- Occupational health and safety examination decisions

6. Sources of Data

Estonian Label House gathers personal data during a recruitment process, at the commencement of and during each employment. Estonian Label House primarily collects personal data from the employee him/herself but also other reliable sources may be used.

We generally collect personal data for the fulfilment of employment contract and in individual cases based on the employee's consent. We may also collect data when an authority discloses information to Estonian Label House to enable it to fulfil its statutory duties, for example in the field of taxation, pension benefits, insurance or social security.

7. Data Life Cycle

Estonian Label House will only keep your data for as long as they are needed for the purposes of processing specified above, or for the purposes of complying with legal requirements or handling claims. Estonian Label House evaluates the specified retention periods regularly. As a rule, the maximum retention periods for personal data are:

- Personal data relating to the recruitment processes: 12 months
- Salary data: 3 years from the termination of employment
- Employment contract: 10 years after the termination of employment relationship
- Medical records occupational health and safety examinations: 10 years after the termination of employment relationship
- Information concerning investigations of occupational accidents and occupational diseases: 55 years

8. Disclosure and Transfer of Personal Data Outside the EU/EEA Area

When fulfilling its obligations as employer, Estonian Label House needs to disclose personal data to certain public authorities and other third parties (e.g. insurance companies). This kind of disclosures can relate to, for example, the processing of personal data in connection with taxation, pension benefits or social security, insurance or travelling on duty.

We have also outsourced the processing of certain personal data to third party service providers, such as IT service providers, surveillance companies and suppliers of payroll, benefit, travel, invoicing and training services as well as remuneration and compensation policy analysis services. When transferring personal data Estonian Label House shall use its best efforts to assure that the party receiving the data maintains adequate processing practices and secrecy.

Estonian Label House does not transfer data outside of the EU or EEA.

9. Rights of Data Subjects

You as a data subject have rights in respect of personal data we hold about you. You have the following rights:

- **Right to request access to your personal data.** You have the right to get a confirmation as to whether Estonian Label House processes personal data on you. If so, you are entitled to receive a copy of the personal data being processed by Estonian Label House.
- **Right to request rectification of inaccurate or incomplete data.** You have the right to ask Estonian Label House to rectify personal data concerning you. You also have the right to have incomplete personal data completed.
- **Right to request erasure.** You have the right to ask Estonian Label House to delete personal data on you in certain situations. However, please note that in the majority of situations, we need personal data on you due to our employment relationship. Due to this, we are not often allowed to delete your personal data.
- **Right to object to processing based on Estonian Label House's legitimate interest.** In cases where Estonian Label House's processing is based on legitimate interest, you have the right to object to the processing on grounds relating to your particular situation. That is to ask that the personal data shall no longer be processed for such purposes.
- **Right to request restriction of processing of personal data.** You have the right to request that Estonian Label House restricts the processing of your personal data under certain circumstances. The restriction of processing means that the personal data that is subject to the restriction may, besides from storage, only be processed (i) with your consent; (ii) for the establishment, exercise or defence of legal claims; (iii) for the protection of the rights of another natural or legal person; or (iv) for reasons of important public interest.
- **Right to data portability.** You have the right to receive the personal data you have personally provided to Estonian Label House in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, if the processing is based on consent or contract, and is carried out by automated means.
- **Right to withdraw consent.** If the processing is based on consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

If you wish to use your above rights as a data subject, please submit your request to Erik Björkenheim erik.bjorkenheim@nordiclabel.fi.

If you consider that your personal data is not processed legally, you have the right to file a complaint with the supervisory authority. In Estonia the supervisory authority is Estonian Data Protection Inspectorate (info@aki.ee, Tatari 39, Tallinn 10134).

10. Principles of Securing Personal Data

Estonian Label House shall ensure that sufficient technical and organizational personal data protection measures are implemented and maintained throughout the organization. Further, Estonian Label House shall ensure that any transfer or disclosure of personal data described in this privacy policy to any third party is subject to Estonian Label House having ensured an adequate level of data protection by agreements or by other means required by law.

In order to help ensure a secure and safe player experience, we are continuously developing and implementing administrative, technical and physical security measures to protect your data from unauthorized access or against loss, misuse or alteration.

Technical controls:

Physical material is destroyed after processing, prior to which such material is stored in locked spaces. Any IT systems are secured by means of the operating system's protection software. Access to the systems requires entering a username and a password and data transfers happen via high encryption channels.

Organizational Controls:

Within the organization of Estonian Label House, the use of the personal data is instructed, and access to IT systems including personal data is limited to such persons who are entitled to access them on the basis of their work assignments or role and who are subject to confidentiality obligations regarding the personal data.