

WÄRTSILÄ'S RECRUITMENT SYSTEM – PRIVACY NOTICE AND CONSENT FOR AUTOMATED DECISION MAKING

Wärtsilä's Job Applicants Privacy Notice
Effective as of 25 May 2018

PRIVACY NOTICE - WÄRTSILÄ'S JOB APPLICANTS

1 Purpose

Purpose of this Privacy Notice is to provide job applicants information about processing of their personal data in Wärtsilä. This Privacy Notice gives a general understanding of such personal data processing. However, the individual recruiting situations may vary significantly. Thus, all of the information provided in this Privacy Notice may not be applicable to each different data processing situation related to job applicants. If you want more detailed information in relation to how specifically your personal data is being processed, you should contact Wärtsilä by using the contact information provided in section 14 of this Privacy Notice.

2 Data Controller

In respect of each data subject's personal data, the controller is regarded to be the Wärtsilä Group company organising the recruitment. To certain extent, Wärtsilä Group companies are sharing so called global data systems, which are provided by Wärtsilä Corporation to the entire group. The global data systems are jointly controlled by Wärtsilä Corporation and each individual group company processing personal data in such systems.

For the avoidance of doubt, in this Privacy Notice "Wärtsilä" shall refer to the company acting as the data controller in each individual case, or in case of global data systems, Wärtsilä Corporation and the applicable local group company together.

Regardless of the applicable data controller in each situation, the data subjects can always use their rights by contacting their own principal or Wärtsilä Corporation as instructed in section 14.

Contact address:
Hiililaiturinkuja 2
P.O. Box 1834
00080 WÄRTSILÄ
Finland

Other contact details:
E-mail: careers@wartsila.com

3 Lawfulness of Processing

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 Wärtsilä and the applicant participating to the recruiting process. For some parts, processing of the personal data is also necessary for the purposes of preparing the employment contract. In some cases Wärtsilä or the local employer company may be required to collect certain information in order to fulfil their statutory obligations. Local legislation may also require Wärtsilä to acquire applicant's consent for processing of certain type of personal data or for conducting of certain processing activities.

In some cases, Wärtsilä may use automatic recruitment decision making in the first phases of recruitment. The use of such automatic decision making in personal data processing is based on a job applicant's consent.

4 Purpose of Processing

The purpose of processing of personal data is to receive and handle applications from job applicants for recruitment and selection purposes, allow access to recruitment tools and carry out the recruitment process. Job applications can be open applications or intended for a certain specific job opening. The applicants filing job applications can be internal (Wärtsilä's current employees) or applicants not currently employed by Wärtsilä.

In certain cases the data may be used for fulfilling of Wärtsilä's or the local company's statutory obligation. Such obligations may relate to e.g. proving that the recruitment decisions have been non-discriminatory.

Certain data processing activities may be outsourced to third parties, in which case such third-party processors operate on behalf of Wärtsilä. E.g., the IT/operational management on-line application system may be outsourced to an external IT supplier and the data may also be processed by external recruitment consultants who are handling applicant assessments and supporting Wärtsilä in the recruitment process.

5 Types of Personal Data

1. Personal information, including name, contact information, place of birth and other similar information necessary for identifying applicants;
2. A cover letter in free format for the application;
3. The applicant's education and work experience information;
4. Suitability questionnaires and self-evaluation records;
5. Potential other similar/relevant application-related information (such as applicant assessment reports by recruitment consultants) which the job applicants may want to disclose to Wärtsilä in connection with their job application; and
6. Subject to the applicable laws and applicants' consent, background check information, such as information obtained through security clearances or similar information sources.
7. Data related to use of applications, software and other IT systems, camera surveillance data, physical access control data, user logs and access control related information (including physical access to Wärtsilä premises)

Types of personal data may also contain some other similar and relevant contact/business information for the purposes of managing deliveries and co-operation relationship as described in section 4.

6 Regular sources of information

As a general rule, Wärtsilä processes such application information which has been provided by a job applicant him/herself. The applicants enter their applications and information in the job applications on Wärtsilä's internet home page using an online service and software designed for the purpose. The applicants may also provide additional information by email or by phone to the persons handling his/her application.

Subject to the applicants' consent, information may also be obtained from recruitment consultants interviewing applicants and handling applicant assessments as a part of the recruitment process. Also, subject to the applicable laws 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

Wärtsilä is actively processing the personal data of the applicants during the recruitment process. After the recruitment process has ended, Wärtsilä passively retains the personal data for pre-defined time periods based on Wärtsilä's genuine needs and legislative requirements Wärtsilä is subject to. The data is deleted gradually in accordance with Wärtsilä's Personal Data Retention Policy. For more information regarding the retention times, you may contact Wärtsilä Corporation by using the contact details provided in section 14.

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 Wärtsilä's employee information data files. The retention times concerning Wärtsilä's employee information data files are available in the respective Privacy Notice made available to Wärtsilä employees.

8 Regular Data Disclosure

Personal data may be disclosed to Wärtsilä Group companies for purposes compatible with the processing purposes defined in section 4 of this Privacy Notice. Some of these entities may be located outside of EU/EEA countries.

9 Data Transfers from EU/EEA

If personal data is transferred outside of the EU/EEA area, the data controller ensures that sufficient level of data protection is maintained through appropriate safety measures, e.g. EU commission's model clauses. More information of such international data transfers and the applied safeguards may be received by using the contact details provided in section 14.

10 Data Security

All data is primarily handled electronically in the recruitment system. If print-outs are taken or any hard copies are otherwise processed, the persons handling the recruitment process at Wärtsilä are responsible for secure processing of such manual material and destroying the material when no longer needed in connection with the relevant recruitment process or if so requested by the applicant.

Access to any electronic or manual materials is limited only to those persons who need to process such information / personal data as a part of their duties within Wärtsilä.

11 Automated decision making

In recruitment processes where the volume of the applicants, volume of the open positions or other similar reasons cause Wärtsilä substantive administrative burden, Wärtsilä may use automatic recruitment decisions in the first phases of the recruitment. The decision making is based on the information the applicant has given regarding his/her education, certifications and work experience as well as possible competence evaluation questionnaires (completed by the applicant him-/herself). This data is then automatically reflected to the pre-defined requirements set for the open position(s) in question and presented for the applicants in the job advertisement (e.g. language skills, education requirements, previous experience etc.).

As a result of the automatic reflecting, an automatic decision is produced regarding whether the applicant's attributes and qualifications are suitable for the position. Based on this decision, the applicant is either invited to the next round of recruitment or the applicant receives an e-mail informing him/her that the recruitment process regarding the respective applicant has ended.

12 Data subject's rights

12.1 Data subject's right to object personal data processing

When the personal data processing is based on the data controller's legitimate interest (only), the data subject is

entitled to object the processing of his/her personal data on grounds relating to his/her particular situation.

Data subject may send his/her request to object the processing in accordance with section 14 of this Privacy Notice. In this request, the data subject shall define the particular situation based on which data subject is objecting the data processing. Wärtsilä may decline the request on statutory grounds.

12.2 Access to information

Data subject is entitled to obtain information of the personal data concerning him/her which Wärtsilä is processing and obtain a copy of such personal data. Request for access may be presented to Wärtsilä in accordance with section 14 of this Privacy Notice.

12.3 Right to rectification, erasure and restriction

Data subject is entitled to have any such personal data that is inaccurate, outdated, unnecessary or contrary to the purposes of data processing corrected or erased. Requests concerning rectification and erasure may be presented in accordance with the instructions in section 14 of this Privacy Notice.

Data subject is also entitled to have the data controller to restrict processing of the data subject's personal data for example when data subject is waiting for the data controller's answer to data subject's access or erasure request.

12.4 Right to lodge a complaint

If the data controller does not follow the applicable data protection regulation, a data subject is entitled to lodge a complaint with competent data protection authority.

13 Using data subject's rights

As a general rule, Wärtsilä does not charge the data subject for using his/her rights presented in section 12. However, Wärtsilä may, at its sole discretion,

(a) refuse to fulfil; or

(b) charge a reasonable fee for fulfilling of

several similar consecutive requests or requests that are manifestly unfounded or excessive. Wärtsilä is also entitled to decline requests on statutory grounds.

14 Contacting the Data Controller

In all questions and matters relating to personal data processing or rights of the data subject, data subjects can contact Wärtsilä Corporation. Wärtsilä Corporation shall further communicate the matter to the Wärtsilä entity considered as the data controller in the respective case. Data subjects may use their rights by e-mail to careers@wartsila.com.