

KALLIOLAW'S RECRUITMENT PERSONAL DATA PRIVACY POLICY

Last updated 31st July, 2026.

1 PERSONAL DATA CONTROLLER

Kalliolaw Asianajotoimisto Oy, Business ID 1621379-9 ("**Kalliolaw**")

Address: Eteläranta 12, 00130 HELSINKI, Finland

2 PERSON RESPONSIBLE FOR DATA PROTECTION MATTERS

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3 NAME AND PURPOSE OF REGISTER

3.1 This policy applies to persons who apply for employment position at Kalliolaw. Each such person is defined in this policy as a "**person**".

3.2 If the person declines to provide to Kalliolaw the personal data that is required for the purpose of recruitment, Kalliolaw is not able to take the person into account in the recruitment process. Provision of personal data to Kalliolaw for the purpose of recruitment is voluntary.

4 PURPOSES OF PROCESSING AND LEGAL BASIS FOR PROCESSING

4.1 The purposes of the processing and the legal basis for the processing of personal data are the following:

- a) Recruitment process, and the review of qualifications for the purpose of the recruitment. Personal data is processed for these purposes based on the person's consent.
- b) Compliance with recruitment related legal obligations and the exercise of recruitment related legal rights. Personal data is processed for these purposes because of Kalliolaw's legal obligations or rights.
- c) Security, and monitoring the access to premises and systems. Personal data is processed for these purposes because of Kalliolaw's legal obligations.

4.2 If consent is the legal basis for the processing of personal data

- a) If the person's consent is the legal basis for the processing and if the person withdraws the given consent, the withdrawal of the consent does not affect the lawfulness of the processing based on the consent before its withdrawal.

5 CATEGORIES OF PERSONAL DATA

The following personal data can be processed by Kalliolaw:

- (a) first name(s) and last name(s);
- (b) preferred name;
- (c) personal title as defined by the person (Mr/Mrs/Miss/Ms);

- (d) address;
- (e) telephone number;
- (f) email address;
- (g) curriculum vitae;
- (h) job applications;
- (i) education details;
- (j) employment certificates;
- (k) expertise;
- (l) previous employers;
- (m) performance reviews by previous employer(s) or other referees, if the person consents that previous employer(s) or other referees may be contacted or if the person provides the performance review to Kalliolaw;
- (n) degree certificates, education diplomas and transcripts of studies;
- (o) security clearance information;
- (p) recordings, transcripts and notes on job interviews;
- (q) reports on suitability tests and evaluations; and
- (r) data obtained through video surveillance cameras.

6 SOURCES OF PERSONAL DATA

- (a) The primary source of personal data is the person.
- (b) Previous employer(s) or other referees, if the person consents that previous employer(s) or other referees may be contacted.
- (c) Recruitment agency.
- (d) Social media links (such as LinkedIn) if referred to by the person.

7 RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Personal data may be processed by Kalliolaw's processors who process the personal data on Kalliolaw's behalf to provide services to Kalliolaw. The current processors are:

- (i) ICT service providers;
- (ii) Microsoft Corporation: Teams;
- (iii) iManage (documentation and collaboration management tool); [Knowledge Work Platform for Legal & Professional Services](#);
- (iv) PSA Sweden AB (iManage consultant);
- (vii) AccessPoint Oy, security surveillance and security services, and
- (viii) Verisure security surveillance and security services.

All these processors can have their own sub-processors.

8 TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES

- 8.1 Kalliolaw does not itself transfer the personal data to countries outside the European Economic Area (EEA), the UK or the European Union (EU) ("**Third Country**").

8.2 Kalliolaw's processors meant in Section 7 could transfer the personal data to Third Countries. The legal basis for the transfer of the personal data to Third Countries is the Binding Corporate Rules, the European Commission's Standard Contractual Clauses for the transfer of personal data to processors established in third countries ("**Standard Contractual Clauses**"), the EU-U.S. Privacy Shield Framework, alternative data export mechanisms for the lawful transfer of personal data (as recognized under EU data protection laws) or another legal basis.

8.3 For example, please see Microsoft's data protection addendum:
[Licensing Documents](#).

9 PERIOD FOR WHICH PERSONAL DATA WILL BE STORED

9.1 Personal data is processed for the time required and permitted under applicable legislation.

9.2 Kalliolaw retains personal data collected from applicants during the recruitment process for approximately 24 months following the conclusion of the recruitment process. This retention period is according to Article 17(3)(e) of the General Data Protection Regulation (GDPR), which allows for the retention of personal data where necessary for the establishment, exercise, or defense of legal claims. In certain circumstances, a shorter or longer retention period may apply if required by applicable law. If the person is employed by Kalliolaw, the personal data will be retained according to Kalliolaw's Human Resources' Personal Data Privacy Policy.

10 METHODS HOW REGISTER IS SECURED

The personal data processed by Kalliolaw is secured by using the following methods and principles:

- (a) locks at Kalliolaw's premises;
- (b) firewall, anti-malware and spam filtering systems of Kalliolaw's communication networks and other software and hardware that protect the security of communication networks;
- (c) restricted user rights to HR systems;
- (d) mandatorily required high quality passwords;
- (e) personal user rights that can be traced in the systems;
- (f) limited number of superusers;
- (g) professional knowledge of Kalliolaw's personnel;
- (h) training of Kalliolaw's personnel;
- (i) the content of the register is in electronic form except for temporary special occasions; and
- (j) Kalliolaw's policies and guidelines relating to personal data matters.

11 RIGHT OF ACCESS

11.1 The person has the right to get information on which personal data on the person is being processed by Kalliolaw, or information that no such personal data is being processed.

11.2 Where such personal data is being processed by Kalliolaw, Kalliolaw shall provide the person with a copy of the personal data and the following information:

- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) the recipients or categories of recipients to whom the personal data is to be or has been disclosed;
- (d) the period for which the personal data will be stored;
- (e) the existence of the right to request from Kalliolaw rectification or erasure of personal data or restriction of processing of personal data concerning the person or to object to the processing of such personal data;
- (f) the right to lodge a complaint to the supervisory authority and the contact details of the supervisory authority;
- (g) communication of the personal data undergoing processing and of any available information as to its source; and
- (h) the significance and envisaged consequences of such processing, at least in the case of measures which produce legal effects concerning the person or significantly affects this person and which are based solely on automated processing intended to evaluate certain personal aspects relating to the person or to analyse or predict in particular the person's performance at work, economic situation, location, health, personal preferences, reliability or behaviour.

11.3 For any further copies requested by the person, Kalliolaw may charge a reasonable fee based on administrative costs.

12 RIGHT TO DATA PORTABILITY

At the person's request, if Kalliolaw processes the personal data based on the person's consent or based on a contract with the person and if the processing is carried out by automated means:

- (a) Kalliolaw shall provide the person with the personal data which the person has provided to Kalliolaw, in a structured, commonly used and machine-readable format;
- (b) At the person's request and if technically feasible, Kalliolaw must transmit the personal data in the same format directly to another controller.

13 RECTIFICATION AND RIGHT TO LODGE COMPLAINT WITH SUPERVISORY AUTHORITY

13.1 Kalliolaw will, at the person's request, without undue delay correct, erase or supplement the personal data in case of erroneous, unnecessary, incomplete or obsolete personal data taking into account the purpose of the processing, including by way of supplementing a corrective statement.

13.2 If Kalliolaw does not take such action on the person's request, Kalliolaw will inform the person without delay and at the latest within one (1) month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

13.3 The person has the right to lodge complaints to the local supervisory authority. Contact details of the Finnish supervisory authority: [Office of the Data Protection Ombudsman | Data Protection Ombudsman's Office](#)

14 RIGHT TO OBJECT TO PROCESSING

The person has the right to object, on grounds relating to the person's particular situation, to the processing of the person's personal data which is based on either of the following legal basis for processing: (i) when the processing has been found necessary for the purposes of the legitimate interests of Kalliolaw or (ii) when the processing has been found necessary in order to protect the person's vital interests. The person however does not have the right to object if Kalliolaw demonstrates compelling legitimate grounds for the processing which override the person's interests or fundamental rights and freedoms, or for the establishment, exercise or defence of legal claims.

15 RIGHT TO RESTRICTION OF PROCESSING

15.1 '**Restriction of processing**' means the marking of the stored personal data with the aim of limiting its use in the future.

15.2 If the person requests, Kalliolaw must restrict the processing in the following situations:

- (a) the accuracy of the personal data is contested by the person, for a period enabling Kalliolaw to verify the accuracy of the personal data;
- (b) the processing is unlawful and the person opposes the erasure of the personal data and requests the restriction of its use instead;
- (c) Kalliolaw no longer needs the personal data for the purposes of the processing, but it is required by the person for the establishment, exercise or defence of legal claims; or
- (d) the person has objected to the processing, but verification whether the legitimate grounds of Kalliolaw override those of the person is still ongoing.

15.3 In the situations listed above, Kalliolaw can only process the personal data:

- (a) with the person's consent, or for the establishment, exercise or defence of legal claims;
- (b) for the protection of the rights of another natural or legal person;
- (c) for reasons of important public interest of the European Union or of a European Union Member State; and
- (d) to store the personal data.

16 RIGHT TO BE FORGOTTEN

16.1 The person has the right to have the person's personal data erased at the person's request if one of the following grounds applies:

- (a) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- (b) the person withdraws the consent on which the processing is based and where there is no other legal ground for the processing;
- (c) the person objects to the processing;
- (d) the personal data has been processed unlawfully; or
- (e) the personal data has to be erased for compliance with a legal obligation in the European Union law or in a European Union Member State law to which Kalliolaw is subject.

- 16.1.2 However, Kalliolaw does not have to erase the personal data to the extent Kalliolaw still needs to process the personal data:
- (a) for exercising the right of freedom of expression and information;
 - (b) for compliance with a legal obligation which requires processing by the European Union law or by a European Union Member State law to which Kalliolaw is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in Kalliolaw,
 - (c) for reasons of public interest in the area of public health subject to legal requirements;
 - (d) for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to legal requirements; or
 - (e) for the establishment, exercise or defence of legal claims.

17 AUTOMATED DECISION-MAKING AND PROFILING

Automated decision-making or profiling is not used by Kalliolaw to process the persons' personal data at the moment.