



# PRIVACY POLICY - CLIENTS

<u>Company</u>	<u>Who processes Your data</u>	<u>Contact person</u>
JP työnvuokraus Oy 3276137-3 Kuninkaistentie 6 A 02610		Data Privacy Officer, JP työnvuokraus privacy@jptyot.fi 09 3540 2230
<u>Whose data we process</u>	<u>Data that we process</u>	<u>Why do we process Your data?</u>
Business Clients Former Business Clients Authorized Contact Persons	<p><i>The following information may be entered in the register. However, only the necessary information is recorded for each registrant.</i></p> <ul style="list-style-type: none"><li>• Business Name</li><li>• Contact Person's Name</li><li>• Contact Person's Email Address</li><li>• Contact Person's Phone Number</li><li>• Contact Person's Title or responsibility area</li><li>• Business Address</li><li>• Industry Details</li><li>• Recruitment Needs and Preferences</li><li>• Any personal data included in the messaging from you.</li><li>• Information regarding the business client relationship, like the services we have provided, payment information, invoicing details, and contacting details.</li><li>• Personal data related to the use of our website, like cookies, browsing data, display of advertisements or similar technology and clicking on them.</li></ul>	<p>We process data based on legitimate interest, to manage our business, to manage our client relationships, or for commercial means.</p> <p>To fulfil contractual obligations required by the law.</p> <p>To fulfil other obligations required by the law.</p>
<u>Where do we obtain the data?</u>		<u>Who else processes your data?</u>
<p>We collect personal data directly from you or your authorized representatives during our business interactions, or when you fill in and send contact forms via our website, or in newsletter subscription based on consent.</p> <p>We also get information from other sources to the extent permitted by applicable laws. These kinds of sources are for example trade register and From Profinder as a transfer in accordance with the data protection regulation.</p>		<p>Company's contractual partners who handle the data on behalf of the company to help provide the offered services agreed, based on the agreement between the parties.</p> <p>There are regular software and service providers who the Company is using, like: CRM and cloud storage, invoicing, and bookkeeping, and the digital communication channels you choose to communicate with us, like email, and chat tools, or digital marketing tools.</p> <p>There may arise special needs for data sharing to third parties, if the Company would be in business arrangements, or when we need to protect our or your rights, when we may need to share some data related to the business arrangements, or to governmental or legal parties.</p> <p><i>Only the necessary information is shared for each.</i></p>

<u><a href="#">Duration of processing</a></u>	<u><a href="#">Your rights</a></u>	<u><a href="#">How we protect Your data</a></u>
<p>We retain your business data as long as our engagement continues and as required by law for record-keeping purposes. After the engagement ends, we will delete non-essential data. Some data may be retained for up to ten years as required by legal obligations.</p>	<p>Right to review Right to rectification Right to object Right to erasure Right to appeal Right to restrict processing</p>	<p>To protect the connection (https), we use a firewall, encrypt data (encryption), restrict access to the registry with usernames and passwords, and commit a non-disclosure agreement with our personnel.</p>

[29.08.2023]

This is a privacy policy and information document for JP työnvuokraus Oy's business clients in accordance with the General Data Protection Regulation (2016/679).

At JP työnvuokraus Oy we value the privacy and security of our business clients' data. This Privacy Policy outlines how we handle and process personal information belonging to our business clients, specifically in the context of our personnel services. It's important that you understand how and why we collect, use, and protect your data.

## 1. CONTROLLER

Hello,

Here at JP työnvuokraus Oy we are committed to safeguarding the privacy of our business clients. This policy is designed to help you understand how we handle and process your data. We've aimed to make the information as clear as possible, using clickable links for easier navigation.

If you have any queries or concerns, please don't hesitate to reach out.

Best regards,

### Contact information

JP työnvuokraus Oy  
3276137-3  
Kuninkaistentie 6 A

Data Privacy Officer  
[privacy@jptyot.fi](mailto:privacy@jptyot.fi)  
09 3540 2230  
[www.jptyot.fi](http://www.jptyot.fi)

## 2. DATA SUBJECTS

This Privacy Policy pertains to the personal data of our business clients who engage with our recruitment services. This includes:

- Business Clients
- Former Business Clients
- Authorized Contact Persons

## 3. PURPOSE AND LEGAL GROUND FOR PROCESSING PERSONAL DATA

<b>Data subject</b>	<b>Purpose of the processing</b>	<b>Legal ground</b>
<i>Business Clients</i>	<ul style="list-style-type: none"><li>• To fulfill contractual obligations and provide recruitment services.</li></ul>	Contractual Necessity
<i>Former Business Clients</i>	<ul style="list-style-type: none"><li>• To meet statutory obligations, including retaining records as required by law.</li></ul>	Legal Obligation
<i>Authorized Contact Persons</i>	<ul style="list-style-type: none"><li>• To ensure effective communication in different business interactions.</li></ul>	Legitimate interest

## 4. PERSONAL DATA RECORDED IN THE REGISTER

We only collect and process the necessary data for each business client, which may include:

- Business Name
- Contact Person's Name
- Contact Person's Email Address
- Contact Person's Phone Number
- Contact Person's Title or responsibility area
- Business Address
- Industry Details
- Recruitment Needs and Preferences
- Any personal data included in the messaging from you.
- Information regarding the business client relationship, like the services we have provided, payment information, invoicing details, and contacting details.
- Personal data related to the use of our website or receiving our digital marketing, like cookies, browsing data, display of advertisements or similar technology and clicking on them.

## 5. DURATION OF PROCESSING

We retain your business data as long as our engagement continues and as required by law for record-keeping purposes. After the engagement ends, we will delete non-essential data. Some data may be retained for up to ten years as required by legal obligations.

## 6. YOUR RIGHTS

You have the following rights, for which requests for access must be made to the controller:

- Data Privacy officer ([privacy@jptyot.fi](mailto:privacy@jptyot.fi) / 09 3540 2230)

### Right to review

You have the right to review the personal data we have recorded of you. You can request us to correct or complete the information if you find inaccuracies or omissions in your data.

### Right to object

You have the right at any time to object to the processing of your personal data if you assume that we have processed your personal data unlawfully or that we do not have the right to process some of your personal data.

When data is processed for public interest, official authority, or compelling legitimate interests of us or a third party, you can object based on your situation.

This right applies when the controller shows compelling reasons that override data subject interests, or for legal claim establishment, exercise, or defense. If personal data is processed for direct marketing, you can object without specific grounds, halting such processing.

## Right to erasure

If you feel that it is not necessary for us to process some of your data about you, you have the right to request us to erase that information. We will process your request, after which we will either erase your data or give you a valid legal ground for why the data cannot be erased. You also have the right to demand that we limit the processing of the disputed data until the matter is resolved.

## Right to appeal

You have the right to file a complaint to the Data Protection Ombudsman if you feel we are violating your personal data when dealing with current data protection legislation ([Instruction for filing a complaint](#)).

For inquiries related to your rights or data handling, please contact our Data Privacy officer (privacy@jptyot.fi / 09 3540 2230).

## 7. SOURCES FOR OBTAINING DATA

We collect personal data directly from you or your authorized representatives during our business interactions, or when you fill in and send contact forms via our website, or in newsletter subscription based on consent.

We also get information from other sources to the extent permitted by applicable laws. These kinds of sources are for example trade register and Profinder, where we get data as a transfer in accordance with the data protection regulation.

## 8. DISCLOSURE OF PERSONAL DATA

We do not share your data with external parties unless required for service provision, and these parties are bound by confidentiality agreements.

We may share your personal data with third parties:

- To trusted external service and system suppliers who work for us and who do not have an independent right to use the information that we transfer to them; These parties are processing (including storing and recording) your personal data for us. However, these service providers do not have the right to review your data unless it is necessary to ensure the functionality of the service: CRM and cloud storage, invoicing, and bookkeeping, and the digital communication channels you choose to communicate with us, like email, and chat tools, or digital marketing tools.
- if the data controller is involved in a business arrangement; and
- if the information is necessary for protecting our rights, or to protect you and others, like to investigate or respond to e.g. a fraud, or other requests from the authorities.
- Only the necessary information is shared for each.

## 9. TRANSFER OF DATA OUTSIDE THE EU

We store data in secure European data centers. In certain cases, personal data may be transferred outside the EU in compliance with relevant laws and using appropriate safeguards.

### Model contract clauses

It is possible that JP työnvuokraus Oy or its service providers may transfer your data outside the EU/EEA area. This may happen if, for instance, JP työnvuokraus Oy or its service providers duplicate some data outside the EU / EEA area in the United States. Data is duplicated to keep your data safe even in situations where major servers fail.

Such a transfer is always conducted safely and according to applicable laws. JP työnvuokraus Oy ensures that all necessary measures are taken to make sure that your data is not transferred to an entity outside the EU/EEA area that does not fulfill the criteria regarding the processing of personal data set forth in applicable laws. The European Commission has approved the use of [model contract clauses](#) to ensure adequate protection when transferring data outside of the EEA. By incorporating [model contract clauses](#) into a contract established between the parties transferring data, personal data is considered protected when transferred outside the EEA or the UK to countries which are not covered by an [adequacy decision](#). We rely on these model contract clauses for data transfers.

## 10. PRINCIPLES OF SECURING THE PERSONAL DATA REGISTRY

We prioritize the security of your data. Our measures include:

- Secure Systems: We employ security software and technical measures to safeguard data.
- Restricted Access: Only authorized personnel have access to data.
- User Authentication: Access requires username and password.
- Firewalls: Our systems are protected by firewalls.
- Data Center Security: Data centers are secure and restricted.
- Backups: Regular backups are taken for data protection.

## 11. UPDATES TO THIS POLICY

Updates to this policy are made to reflect any changes in our personal data processing. You may view our privacy policy in force at any given time on our website. We will notify you about any larger updates of our privacy policy on the website.