



PRIVACY POLICY - EMPLOYEES, PARTNERS, AND JOB APPLICANTS

Your data is processed by

JP työnvuokraus Oy (3276137-3)
Kuninkaistentie 6 A, 02610 Espoo

Contact person

Data Privacy Officer, JP työnvuokraus
privacy@jptyot.fi
09 3540 2230

Whose data we process

Employees
Former employees
ICE contact person
Job applicants
Partners

Who else processes your data?

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.

These are: our chosen HR and cloud storage, the digital communication channels you choose to communicate with us, like chat tools. Based on your request, possibly also governmental parties like Migri or TE-office. With your consent also our end client who we are doing recruitment for. After employment in order to fill our obligations we have services for occupational healthcare, Insurance companies, work safety management, processing payroll, invoicing, and bookkeeping. Also governmental services related to taxation, immigration and employment like Vero, TE-office or MIGRI. And eventually the company who we are recruiting or offering your work for, and who may require to use their own software. *Only the necessary information is shared for each.*

Why do we process Your data?

To fulfil contractual and employment obligations required by the law.

To fulfil other obligations required by the law.

Where do we obtain the data?

In principle, we get the personal data from You. We may also receive some data from other sources, e.g. public authorities, client companies to which You are performing work to, or if you have provided references to contact, insurance provider or healthcare provider.

Data that we process

- Identity details
- Contact details
- Education information
- Language skills
- Payroll data, tax information
- Bank account and payment details
- ICE-Person
- Labour union membership details
- Occupational health service visit details
- Sick leave information
- Job suitability info (interview notes, questionnaires)
- Accident information
- CV (job history, skills, etc)
- Details of job application
- Information provided in interviews
- Immigration information
- Account and log information
- Information regarding work assignments, and performance,
- Work hours data with access- and punch-in events; access code; access identifier data; person and access-right groups; additional data of punch-in events; possible location data for punch-ins of working hours; user ID, password and access rights, and any additional information completed by the controller.
- Access control information

Only the necessary information is recorded for each registrant.

Your rights

Right to review
Right to object
Right to erasure
Right to appeal

Duration of processing

- The duration of employment
- Ten years after the end of employment to give you a testimonial
- The duration of a partners contract with JP työnvuokraus and 2 years afterwards
- until the job applying process is complete.

How we protect Your data

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.

26.10.2023

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

1. CONTROLLER

Hello,

Here at JP työnvuokraus Oy we take our employees', partners', and job applicants' privacy seriously. One essential part of this protection is that you know what personal data we are dealing with, how and why.

In this privacy policy and information document, we strive to tell as openly and transparently as possible how we process the personal information of our employees and potential future employees and our partners. The report has a lot of information, but we've tried to make it easier to use clickable links.

If you have any questions, please feel free to contact me.

Regards,

Data privacy officer
JP työnvuokraus Oy

Contact information

JP työnvuokraus Oy
3276137-3
Kuninkaistentie 6 A

Data Privacy Officer
privacy@jptyot.fi
09 3540 2230
www.jptyot.fi

2. DATA SUBJECTS

The register records information regarding the companies:

- Employees
- Former employees
- Employee's in case of emergency contact
- Job applicants
- Partners

3. PURPOSE AND LEGAL GROUND FOR PROCESSING PERSONAL DATA

Data subject	Purpose of the processing	Legal ground
<i>Employees</i>	To fulfil contractual and employment obligations required by the law. <ul style="list-style-type: none">• Payroll• Payment of taxes and other employer contributions• Organising occupational health care• Immigration and work permit	Contract Statutory obligation
<i>Former employees</i>	To comply with statutory obligations, including the obligation to store the employment data for ten years to issue a work testimonial.	Statutory obligation
<i>Job applicants</i>	To analyze if the job applicant is suitable for a position.	Legitimate interest
<i>Emergency contact person</i>	To contact in case of emergency.	For Your safety*

<i>Partners</i>	To fulfil contractual obligations required by the law. <ul style="list-style-type: none">• Pay	Contract

*) Typically, the entity which processes personal data, in this case, we need authorization from the person whose personal data will be processed. However, we will not call your emergency contact to ask if we can handle their information. We are confident that they will accept processing their personal data for these purposes and that you will inform them that you have designated them as a contact person in emergencies.

4. PERSONAL DATA RECORDED IN THE REGISTER

The following data is stored in the register:

Information	Emp- loyee	Former employee	Appli- cants	ICE contact	Person performing work for partner	Purpose
Name	x	x	x	x	x	Identification
Phone number	x	x	x	x	x	Communication
Email address	x	x	x	x	x	Communication
Home address (address, postal code and municipality)	x	x		x		Communication
Business address					x	
Duration of the employment (start and end date)	x	x				Personnel management, testimonial
Information related to software used, e.g. user accounts and logs, access code; access identifier data; person and access-right groups, location	x	x			x	Security,
Information regarding work assignments, performance, and hours	x	x			x	Appointing job functions, testimonial, time keeping, billing, quality

						assurance
Information related to access control	x				x	Security
Job functions	x	x				Appointing job functions, testimonial
Personal identity code	x	x				Identification
Sick leave information	x					Payroll
Immigration details (passport, residence permit card image, certificates, work references)	x	x			x	Legal compliance
Language skills	x		x		x	Appointing job functions or assignments
CV (e.g. information regarding education, job history, and Valtti card and certificates as proofs of qualifications, and a picture) of job seekers or persons performing work for partners	x		x		x	Monitoring the skills, appointing job functions or assignments
Answers to questionnaires testing professional skills	x					Appointing job functions
Certain information provided in interviews	x		x		x	Appointing job functions or assignments
Job application	x		x		x	Appointing job functions or

						assignments
Payroll data	x	x				Payroll
Bank account, salary and other compensation, and taxation information	x					Payroll
Emergency contact persons	x				x	Emergency
Business ID					x	Billing tracking

Sensitive personal data

Information regarding the membership of labour union	(x)*					Payment of membership fee
Information on occupational health care visits	(x)*					Billing tracking

*) This data may not be processed at all.

5. DURATION OF PROCESSING

As an employee, we process your personal data **as long as the company employs you**. This time, the contact information of the person you are named is also stored.

However, the Employment Contracts Act requires that we retain certain data (such as the duration of the employment and work assignments) for ten years after the termination of employment so that we can provide you with a testimonial. We will, therefore, process this information for at least ten years to fulfil our statutory obligation. However, we will erase data not explicitly required by law at the end of your employment.

As a job applicant, we process personal data regarding your job application as long as the company employs you if you are selected for the position or until a final decision has been made about not selecting you for the position, unless we ask for permission to retain your personal data for longer.

As a partner who offers his/her work services, we process your personal data regarding your work as long as the company offers you work and is using your services, and 24 months after.

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 / 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.

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](#)).

7. SOURCES FOR OBTAINING DATA

We will get personal data regarding you and the emergency contact person from you. We may also receive some data from other sources, e.g. public authorities, client companies to which a data subject is performing work to, insurance provider or healthcare provider.

8. DISCLOSURE OF PERSONAL DATA

We will not disclose your personal data to any other parties. We use the following services to maintain and process personal data registers and who help the Company to provide the offered services agreed, based on the agreement between the parties.

- For Job seekers, Employees and Partners these are: our chosen HR and cloud storage, the digital communication channels you choose to communicate with us, like chat tools. Based on your request, possibly also governmental parties like Migri or TE-office. With your consent also our end client who we are doing recruitment for.
- For Employees: After employment in order to fill our obligations we have services for occupational healthcare, insurance companies, work safety management, processing payroll, invoicing, work time management, and bookkeeping. Also governmental services related to taxation, immigration and employment like Vero, TE-office or MIGRI.
- For persons performing work for Partners: in order to fill our contractual obligation, we disclose information to services required for invoicing and tracking hours based on which invoicing is done, and bookkeeping. We may also be required by law to disclose personal information to governmental authorities, like MIGRI.
- And eventually the company who we are recruiting or offering your work for, and who may require to use their own software.

Only the necessary information is shared for each. 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.

9. TRANSFER OF DATA OUTSIDE THE EU

We have chosen secure data centres in Europe to store your information.

If we are obliged to disclose personal information under applicable mandatory legislation, personal data may be transferred outside the European Union and the European Economic Area.

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

Safe processing of your personal information is important to us. The personal data under this Privacy Policy is stored in a system protected by the security software of the operating system used.

- Accessing the system requires entering a username and password. Firewalls and other technical measures also protect the system.
- Only specific predefined data controllers can access and are authorised to use the data in the registry stored in the system.
- User IDs, passwords and access rights protect the use of the registry.
- The registry is stored on servers located in a data centre where unauthorised access is restricted.
- The data contained in the register is located in locked and guarded spaces.
- Regular backups are taken from the registry.

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.