

<p>1 Filing system</p>	<p>Employee Onboarding process</p>
<p>2 Controller</p>	<p>Name Patria Plc</p> <p>Address Arkadiankatu 2 FI-00100 Helsinki, Finland</p> <p>Other contact information (e.g. telephone during office hours, email address) security@patriagroup.com</p>
<p>3 Data protection officer / contact person in matters relating to the filing system</p>	<p>Name Data Protection, Risk and Compliance Manager Anna Nousiainen</p> <p>Address Arkadiankatu 2 FI-00100 Helsinki, Finland</p> <p>Other contact information (e.g. email address, telephone during office hours) info@patriagroup.com security@patriagroup.com</p>
<p>4 Purpose of processing personal data, legal basis for processing and information on the source of the personal data</p>	<p>The purpose of this personal data filing system is to process information in the Employee Onboarding process in order to establish an employment relation between the Controller Patria Plc and employee and to prepare both the recruiting organisation and the employee to begin the employment relationship.</p> <p>Purposes for processing personal data, legal basis for processing and data collection:</p> <p>Purpose of processing: To establish an employment relation between the Controller Patria Plc and employee and to prepare both the recruiting organisation and the employee to begin the employment relationship.</p> <p>Legal basis: Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Data collected from: The data subject i.e. the registered person and from third parties who manage employee entrance health check and security clearance. Information on health check and security clearance is entered in the Onboarding register by the employee's or job-seeker's manager.</p>
<p>5 Description of the categories of data subjects and categories of personal data</p>	<p>The data subjects are: Patria employees and job-seekers in the Employee Onboarding process</p> <p>The following information is stored about data subjects: Name, social security number, gender, citizenship, secondary and former citizenship, native preferred language, home address, consent for security clearance vetting, bank account number, photo for ID card, monthly/hourly salary, standard weekly hours, employment start date, salary payment type, salary, manager, position and title, business function employer company, cost center, primary working location, employee type, employment contract type, contract end date and basis for temporary contract, probation details, notice</p>

	period, applicable collective agreement, drug test Y/N, employee entrance health Y/N, personal security clearance Y/N
6 Legitimate interests of the controller or a third party	N/A
7 Recipients and disclosure of personal data	<p>As a broad interpretation of Article 4(9) of the GDPR, the parties (processors/recipients of personal data) to which Patria as a controller transfers personal data for processing (for example, in the context of performing maintenance tasks via a technical interface) are listed below.</p> <p>Access to the personal data in this filing system will be granted to the system supplier (private-sector system supplier(s)) as necessary for investigating any technical hardware or software failure.</p> <p>In addition, personal data in the filing system can be disclosed as necessary:</p> <ol style="list-style-type: none"> 1) for executing orders issued by the authorities, to the authority requesting the data; 2) to the suppliers of information systems, tools and equipment required for various tasks and to the suppliers in charge of identity and access management; 3) to suppliers investigating security incidents or nonconformities; 4) with consent of the registered person to supplier of employee health services 5) to attorneys and law firms providing legal services; 6) courts.
8 Transfer of personal data to a third country or an international organisation	<p>According to Article 45(1) of the GDPR, the transfer of personal data to a third country or an international organisation may take place where the Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organisation in question ensures an adequate level of protection. Such a transfer does not require any specific authorisation.</p> <p>The personal data in Patria Plc's filing system may be transferred outside the EU/ETA on the following conditions:</p> <p>In accordance with Article 46 of the GDPR: Transfers (of personal data) subject to appropriate safeguards. Data will not be disclosed outside the EU, European Economic Area or countries decided by the Commission to provide an adequate level of protection unless an adequate level of protection is ensured through contracts or otherwise as required by law.</p>
9	

<p>Data retention period</p>	<p>Data collected for Patria's filing systems will only be stored for as long as and to the extent necessary in relation to the original and compatible purposes for which the personal data was collected.</p> <p>Personal data is deleted from the filing system for Employee Onboarding process in 11 years following the end of the persons' employment relationship. Data of persons who do not progress in the Onboarding process to signing an employment agreement is removed inside one (1) month from the decision of discontinuing the employee onboarding.</p>																								
<p>10 Principles of data protection; description of technical and organisational security measures</p>	<p>Personal data will remain confidential. Patria Plc's data network or server environment or the cloud services in which the filing systems are located are protected by firewalls and other the necessary technical measures. Organisational security measures are applied by way of limiting access to data to those persons working for data controller's organization who have a role-based need and purpose to process the data.</p>																								
<p>11 Rights of the data subject</p>	<p>Data subjects have right of access to any personal data stored on them in the filing systems. According to the GDPR, the controller must reply to the data subject's request to exercise their rights within one month of receipt of the request.</p> <p>All requests should be sent in writing to one of the following Patria offices. The data subject must prove their identity when requesting access or rectification.</p> <table border="1" data-bbox="475 1216 1479 1928"> <thead> <tr> <th>Country</th> <th>Patria premises</th> <th>Opening hours</th> </tr> </thead> <tbody> <tr> <td>Belgium</td> <td>Rue du Fond des Fourches 23, 4041 Herstal</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> <tr> <td>Estonia</td> <td>Betooni 6a, Tallinn</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> <tr> <td>Finland</td> <td>Arkadiankatu 2, Helsinki Autotehtaantie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaantie 1, Halli</td> <td>Mon–Fri at 8-16</td> </tr> <tr> <td>Latvia</td> <td>Dunties 23A, 1005 Riga</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> <tr> <td>Spain</td> <td>Aeropuerto de Córdoba, Ctra. Nacional 437, Km 5,8 14005 Córdoba</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> <tr> <td>Sweden</td> <td>Helikoptervägen 1, Stockholm-Arlanda</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> <tr> <td>The Netherlands</td> <td>Hengelder 22, 6902 PA Zevenaar</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> </tbody> </table>	Country	Patria premises	Opening hours	Belgium	Rue du Fond des Fourches 23, 4041 Herstal	Requires appointment – contact security@patriagroup.com	Estonia	Betooni 6a, Tallinn	Requires appointment – contact security@patriagroup.com	Finland	Arkadiankatu 2, Helsinki Autotehtaantie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaantie 1, Halli	Mon–Fri at 8-16	Latvia	Dunties 23A, 1005 Riga	Requires appointment – contact security@patriagroup.com	Spain	Aeropuerto de Córdoba, Ctra. Nacional 437, Km 5,8 14005 Córdoba	Requires appointment – contact security@patriagroup.com	Sweden	Helikoptervägen 1, Stockholm-Arlanda	Requires appointment – contact security@patriagroup.com	The Netherlands	Hengelder 22, 6902 PA Zevenaar	Requires appointment – contact security@patriagroup.com
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	<p>A. Right of access to personal data</p> <p>Data subjects have right of access to any personal data stored on them in Patria's personal data filing system.</p> <p>B. Right to rectification and restriction of processing</p> <p>Data subjects have the right to require the controller to rectify inaccurate and incorrect personal data concerning them.</p> <p>Data subjects have the right to restrict processing by Patria as the controller of this filing system where one of the following applies:</p> <ul style="list-style-type: none">- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;- the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims;- the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject. <p>C. Right to erasure</p> <p>Data subjects have the right to have the personal data concerning them erased from filing system without undue delay where one of the following grounds applies:</p> <ul style="list-style-type: none">- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;- the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);- the personal data has been unlawfully processed;- the personal data has to be erased to comply with a legal obligation in European Union or national law.
<p>12 Right to object</p>	<p>According to Article 21 of the GDPR, data subjects have the right to object, on grounds relating to their particular situation, to the processing of personal data concerning them which is based on Article 6(1)(e) (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller), including profiling based on those provisions. The controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.</p>

<p>13 Data portability</p>	<p>Once the data subject has provided Patria with the personal data concerning them in a structured, commonly used and machine-readable format, they have the right to have that data transmitted to another controller when:</p> <ul style="list-style-type: none"> a) the processing is based on the data subject's consent or on a contract between the controller and data subject; and b) the processing is carried out by automated means; and c) the transfer is technically feasible. 																
<p>14 Right to complain to the supervisory authority</p>	<p>Data subjects have the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data concerning them infringes the applicable data protection regulations.</p> <table border="1" data-bbox="475 813 1481 2020"> <thead> <tr> <th data-bbox="475 813 715 846">Country</th> <th data-bbox="715 813 1481 846">Contact info</th> </tr> </thead> <tbody> <tr> <td data-bbox="475 846 715 1059">Finland</td> <td data-bbox="715 846 1481 1059">The Office of the Data Protection Ombudsman Finland Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Website: Telephone: + 358 29 566 6700 Email: tietosuoja@om.fi</td> </tr> <tr> <td data-bbox="475 1059 715 1245">Estonia</td> <td data-bbox="715 1059 1481 1245">Estonian Data Protection Inspectorate Address: 39 Tatari St., 10134 Tallinn, Estonia Website: Telephone +372 627 4135 Email: info@aki.ee</td> </tr> <tr> <td data-bbox="475 1245 715 1431">Sweden</td> <td data-bbox="715 1245 1481 1431">Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Website: Telephone: +46 8 657 61 00 Email: imy@imy.se</td> </tr> <tr> <td data-bbox="475 1431 715 1525">Belgium</td> <td data-bbox="715 1431 1481 1525">Autorité de protection des données Website: https://www.autoriteprotectiondonnees.be/citoyen Email: dpo@apd-gba.be</td> </tr> <tr> <td data-bbox="475 1525 715 1680">Latvia</td> <td data-bbox="715 1525 1481 1680">Datu valsts inspekcija Address: Elijas iela 17, Rīga, LV-1050, Latvia Website: https://www.dvi.gov.lv/lv Telephone: +371 67223131 Email: pasts@dvi.gov.lv</td> </tr> <tr> <td data-bbox="475 1680 715 1865">The Netherlands</td> <td data-bbox="715 1680 1481 1865">Autoriteit Persoonsgegevens Address: Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands (only by appointment) Website: https://autoriteitpersoonsgegevens.nl Telephone: +31 88 1805 250</td> </tr> <tr> <td data-bbox="475 1865 715 2020">Spain</td> <td data-bbox="715 1865 1481 2020">Agencia española protección datos Address: C/ Jorge Juan, 6, 28001-Madrid, Spain Website: https://www.aepd.es/es Telephone: +34 900 293 183 Email: prensa@aepd.es</td> </tr> </tbody> </table>	Country	Contact info	Finland	The Office of the Data Protection Ombudsman Finland Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Website: Telephone: + 358 29 566 6700 Email: tietosuoja@om.fi	Estonia	Estonian Data Protection Inspectorate Address: 39 Tatari St., 10134 Tallinn, Estonia Website: Telephone +372 627 4135 Email: info@aki.ee	Sweden	Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Website: Telephone: +46 8 657 61 00 Email: imy@imy.se	Belgium	Autorité de protection des données Website: https://www.autoriteprotectiondonnees.be/citoyen Email: dpo@apd-gba.be	Latvia	Datu valsts inspekcija Address: Elijas iela 17, Rīga, LV-1050, Latvia Website: https://www.dvi.gov.lv/lv Telephone: +371 67223131 Email: pasts@dvi.gov.lv	The Netherlands	Autoriteit Persoonsgegevens Address: Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands (only by appointment) Website: https://autoriteitpersoonsgegevens.nl Telephone: +31 88 1805 250	Spain	Agencia española protección datos Address: C/ Jorge Juan, 6, 28001-Madrid, Spain Website: https://www.aepd.es/es Telephone: +34 900 293 183 Email: prensa@aepd.es
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PRIVACY NOTICE

EU General Data Protection Regulation (GDPR) (679/2016), Articles 12–14 and Data Protection Act (1050/2018)

6.6.2023

Automated decision-making and profiling	The personal data in the filing system will not be used for automated decision-making or profiling.
16 Additional information	Patria Group reserves the right to update this Privacy Notice.
17 Updates	The document was last updated on 6.6.2023
18 Appendices	