

Privacy Statement for Job Applicants

This privacy statement (hereinafter referred to as the “Statement”) explains how Solwers collects, processes, and discloses personal data in connection with job applications and the recruitment process.

1. DATA CONTROLLER

In accordance with applicable data protection laws, the data controller is Solwers Plc/Solwers Finland Oy/Solwers Sweden AB/Solwers Poland Sp. z o.o. (hereinafter referred to as the “company”, “we”, “us”, or “our”). Solwers is responsible for ensuring that your personal data is processed in compliance with this Statement and applicable data protection laws.

Contact details of the data controller: Solwers Plc, Director of Human Resources (nina.nikander@solwers.com)

2. COLLECTION OF PERSONAL DATA

Your personal data may be collected in various ways. Primarily, we collect personal data directly from you. To the extent permitted by applicable laws, we may also collect personal data from other sources, such as public databases.

We collect and process personal data relating to applicants that is necessary for handling job applications and the recruitment process, such as:

- **basic information**, e.g. name, home address, email, phone number, place and date of birth;
- **information included in your job application and related documents**, e.g. educational background, previous work experience, degrees, language skills, and referees; and
- **data collected and processed during the recruitment process**, e.g. information regarding the progress of the recruitment process, notes concerning the application, and any interviews, as well as suitability assessments and referees, if necessary

3. PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

We process applicants’ personal data in the recruitment process, for example for the processing of job applications, informing applicants about the progress of the recruitment process, arranging interviews, and assessing professional or personal suitability. The legal basis for the processing of personal data is the implementation

of measures prior to entering into an employment contract, based on a request arising from the application you have submitted to us.

In certain circumstances and to the extent permitted by applicable law, we may also process personal data for reliability assessments or background checks based on your consent.

4. TRANSFERS AND DISCLOSURES OF PERSONAL DATA

We may disclose personal data to third parties:

- to the extent permitted or required by law;
- when our partners process personal data on our behalf and in accordance with our instructions (e.g. outsourced payroll and accounting services). We always ensure the appropriate processing of your personal data;
- when we believe that the disclosure of personal data is necessary to exercise our rights, protect your safety or the safety of others, investigate misuse, or respond to a request from an authority; and
- with your consent, to parties covered by the consent, such as referees.

5. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU OR EEA

We may transfer personal data outside the European Union or the European Economic Area where our partner responsible for carrying out the assignment is We implement appropriate technical and organisational measures (including physical, digital, and administrative measures) to protect personal data against loss, destruction, misuse, and unauthorised access or disclosure. By way of example, access to personal data is restricted to persons who need such data to perform their duties.

Please note that even appropriate security measures cannot prevent all possible data security breaches. In the event of a personal data breach, we will notify you in accordance with applicable laws.

established outside these areas. In such cases, we ensure that appropriate safeguards are in place to protect the rights and freedoms of data subjects in accordance with applicable data protection legislation, such as the EU General Data Protection Regulation (GDPR).

6. RETENTION OF PERSONAL DATA

Personal data is retained only for as long as necessary to fulfil the purposes defined in this Privacy Statement.

Personal data is retained for the duration of the recruitment process. Personal data may also be retained, where necessary, after the recruitment process has ended to the extent permitted or required by applicable law. As a general rule, we retain personal data for six (6) months after the end of the recruitment process.

Personal data is deleted when its retention is no longer necessary to comply with the law or to fulfil the rights or obligations of either party.

7. YOUR RIGHTS

You have the right to access your personal data. You may also request the rectification, updating, or erasure of your personal data at any time. Please note, however, that personal data which is necessary for the purposes defined in this Privacy Statement, or which must be retained by law, cannot be erased.

You have the right to object to or restrict the processing of your personal data to the extent required by applicable law.

In certain cases and in accordance with applicable law, you have the right to data portability, meaning the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format and to transfer such data to another data controller.

Where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. After the withdrawal of consent, we will no longer process your personal data unless there is another legal basis for the processing.

You may exercise your rights by submitting a request to us using the contact details provided above.

If you believe that the processing of your personal data is not appropriate, you have the right to contact the Data Protection Officer. You can find the contact details of the Data Protection Officer on the website:

- In Finland, Tietosuojavaltuutetun toimisto: <http://www.tietosuoja.fi/fi/index.html>
- In Sweden, Integritetsskyddsmyndigheten (IMY): <https://www.imy.se/om-oss/>
- In Poland, Danych Osobowych (UODO): uodo.gov.pl

8. DATA SECURITY

We implement appropriate technical and organisational measures (including physical, digital, and administrative measures) to protect personal data against loss, destruction, misuse, and unauthorised access or disclosure. By way of example, access to personal data is restricted to persons who need such data to perform their duties.

Please note that even appropriate security measures cannot prevent all possible data security breaches. In the event of a personal data breach, we will notify you in accordance with applicable laws.

9. AMENDMENTS TO THIS PRIVACY STATEMENT

We reserve the right to amend this Privacy Statement. This Privacy Statement was last updated on 19 September 2025.

10. CONTACT DETAILS

If you have any questions regarding this Privacy Statement or require further information about the processing of your personal data, you may contact us using the contact details provided above.