

## **Aalto University**

### **Privacy Notice to Employee Candidates**

*Valid from 25 May 2018 onwards*

Please read this Notice carefully prior to participating in Recruitment.

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#### ***1. Introduction***

We appreciate your interest in Aalto, and we will process and use your personal data responsibly.

This Privacy Notice to Employee Candidates describes our data protection practices which apply to the collection and processing of the Employee Candidate's ("you" and "your") personal data (applicant data) in Aalto's recruitment processes.

Protecting your privacy and your personal data is of the utmost importance to us. We are committed to complying with the requirements that data protection regulation places upon us in the processing of your personal data. At Aalto, also a **Personal Data Policy** for the protection of personal data has been confirmed as a code binding the members of the university community.

In addition to legislation regarding the protection of personal data, the university is bound by the Act on the Openness of Government Activities (621/1999). According to the principle of public access, all information held by the university is public unless otherwise decreed. The publicity of personal data is thus determined by this legislation. The legislation

also applies to the divulgence of personal data from the university's personal data registers. In accordance with the Act on the Openness of Government Activities, the university may be required to divulge information that includes personal data to third parties.

In addition to the above, the processing of personal data at Aalto is guided and complemented by the **University Data Control Plan**.

## **2. How we collect information**

Participating in the recruitment process requires you to provide certain applicants' data yourself. Aalto uses an electronic recruitment system. By registering, you will provide your data and save it yourself.

In the electronic recruitment system, we make sure we are given the consent required for recruitment-specific data processing and transfer, and where required by the recruitment process, for carrying out a bibliographic analysis. Based on the consent given, the personal information you provide may be processed by Aalto University's internal evaluators involved in the recruitment process and, where necessary, the personal data may be transferred electronically if required by the recruitment process and processed electronically by external experts in the European Union or outside the territory of the European Union.

Depending on the recruitment process, applicant data is collected from the applicant by telephone, in job interviews, during teaching demonstration events, during so-called site visits or, with the consent of the applicant, from parties such as former/current employers (supervisor).

### ***What information we collect and process***

In order for us to process your application, we request that you provide personal information required for the recruitment. You decide, how much information you provide to Aalto University.

*Some of the requested information may, however, be essential in order for us to be able to process and evaluate your application, and without this information, the opportunities for you to be considered for a post may be limited.*

We always, exclusively collect information necessary for the recruitment concerned, including the following:

**Identification information:** Name, contact details (phone number, e-mail and address), sex, date of birth and citizenship.

**Information indicating professional competence:** E.g. education, work experience, language skills, list of publications

**Other information related to the application:** Application in free form, CV, study plan, teaching portfolio, recommendations and referees. Should you provide information on another person, it is your responsibility to ensure that you receive their consent in advance before providing their name and contact details to Aalto University.

**Bibliographic analysis:** The data sources used include e.g. Web of Science, Scopus or Google Scholar.

**Sensitive Personal Information:** Aalto University does not request or collect sensitive personal data in connection with recruitment. However, if you provide this information, it is not visible in the recruitment process.

Sensitive personal information includes data such as race or ethnic origin, physical or mental health, political opinions or religious beliefs, sexual orientation, trade-union membership, and genetic data.

**Aptitude assessment:** Potential aptitude assessments are carried out by Aalto University's contractual partner who uses reliable testing methods.

**Verifying personal credit information:** In the case of a job where the credit data of the person selected for the post must be verified, we have already indicated this in the application notice. Your credit information will be verified in credit registers with your consent.

### ***3. Information we collect automatically***

We may use cookies and other similar monitoring techniques that will automatically collect information about your visit to our sites. To learn more, see Aalto University notice on cookies. This information is not used in any way in the recruitment process.

### ***4. Data from other third-party sources***

For example, you may allow us to access certain personal data stored by third parties, such as social media sites (for instance the LinkedIn service). When you give Aalto University your permission to access this information, you accept that Aalto University may collect, store, and use this information in accordance with this notice.

### ***5. Data processing purposes***

Aalto University will process applicants' data mainly in connection with recruitment processes, as part of the receipt of applications, interviews, personal assessments, possible background checks and other measures required for recruitment purposes.

Therefore, the main purpose of the processing applicants' data is

- Filling our vacancies

- Creating a resource bank

We may also process applicants' data for the following purposes:

- Reporting and statistics;
- IT system and process development; and
- Securing the rights of the Employee Candidate and Aalto University and ensuring compliance with applicable laws.

Employee Candidate data will not be used for direct marketing or any other purposes than those referred to in this notice.

## **6. *Lawful basis for processing Employee Candidates' data***

The lawful bases for processing your personal data is based on:

- Consent of the Employee Candidate and / or third parties;
- Data controller's binding statutory obligations or rights, including unlimited labour, data protection, equality, non-discrimination and criminal law; or
- The legitimate interest of the data controller (filling vacancies).

## **7. How we process your information and to whom we disclose your information**

We will process your personal data according to the Data Protection Regulation in ways that respect your rights and liberties. We will ensure that the principles of data protection are followed in all stages of personal data processing.

In addition to legislation regarding the protection of personal data, the university is bound by the Act on the Openness of Government Activities (621/1999). According to the principle of public access, all information held by the university is public unless otherwise decreed. The publicity of personal data is thus determined by this legislation. As a result of the application of the Act on the Openness of Government Activities, the university may be obliged to disclose information and documents containing personal data to third parties. The names of applicants to university posts and material related to recruitment are mainly public. The university aims at respecting the wishes of the applicant by all available means.

Your data will only be processed by Aalto University employees or individuals operating for or on behalf of Aalto who are authorised to process personal data. Access and reading rights on the electronic recruitment system are determined and granted, to the extent required by the task, only to individuals who need the personal data file information within the data system concerned in order to perform the task assigned to them.

No applicant data or documentation related to recruitment information is generally disclosed to third parties / bystanders, unless required by law.

We may disclose your data to third parties in the following situations:

- Statutory statistics and reporting to Statistics Finland and the Ministry of Education and Culture.
- Compliance with the law or the requirements of competent law enforcement authorities, state agencies, courts or third parties in order to comply with requirements related to a legal process or law enforcement or to exercise or to defend our legal rights.
- Information requests concerning the recruitment process

## **8. Do we transfer your personal information outside the EU or the EEA?**

The university's data protection policy involves particular care when personal data is transferred outside the EU and the European Economic Area (EEA) to countries which do not offer outside data protection in accordance with the EU Data Protection Regulation. Transferring personal data outside the EU and the EEA shall be carried out in accordance with the requirements of the Data Protection Regulation.

We mainly process your personal information only within the EU or the EEA. In certain types of recruitment (Tenure track) personal data will be processed on behalf of Aalto University by external experts who may operate outside the EU / EEA (in so-called third countries). The university will ensure that the external experts acting as data processors are committed to complying with the university's data protection and data security instructions.

## **9. How long do we retain your personal information?**

The retention times for personal data and documentation related to the recruitment process are based on law and Aalto University's Data Control Plan. In accordance with data protection principles, we do not store outdated or unnecessary data.

The information you provide will be automatically removed from the electronic recruitment system three years (36 months) after submitting the application. Other materials related to recruitment are mainly stored for 36 months after the vacancy is filled, with the exception of material which is of significant importance for research.

*Material relevant to research:*

The **Finnish National Archives** have decreed that material relevant to research shall be stored permanently. Such materials include the application materials of individuals selected for posts within the Tenure track recruitment process, the application materials of

individuals selected for the so-called short list and other material related to their recruitment as well as the application materials of the management (President, etc.).

## 10. Your rights

You shall be entitled

- To access your Employee Candidate data;
- To verify the accuracy of your data stored in the system;
- To request the editing or deletion of your incomplete, inaccurate or obsolete data;
  - At any time during the application period, you may also check, update or delete your data from the system. In connection with a targeted application, the withdrawal of the application will result in the deletion of the application documents, leaving an indication of the withdrawal of the application in the system.
  - After the end of the application period, you will no longer be able to update data recorded in a targeted application. Requests for the correction of information should be submitted to the Aalto University employee serving as the HR contact person.
  
- Being forgotten under certain conditions: In this case, you may request that we delete your information in our systems. If there are no other legal grounds for processing personal data, we will delete the data.
  
- Restricting the processing of your Employee Candidate data under certain conditions (for instance, if you believe that your personal information in our possession is incorrect or illegally in our possession)
- Receiving the Employee Candidate data you provided us in a structured, commonly used and mechanically readable form.

You shall be entitled to withdraw your consent to the processing of your Employee Candidate data and to the transfer of these data:

- Please note that the completion of the recruitment process requires the provision of information considered to be necessary and your consent to the processing and transfer of these data. Failure to provide the above-mentioned data or the withdrawal of your consent may lead to a limited potential of considering you for a post.
- If you cancel your application before the decision on the selection of an applicant is made in the recruitment process, your information will be deleted in the electronic recruitment system.

- Please note that the withdrawal of your consent shall not affect the legality of the processing to the extent that your data was processed before you withdrew your consent.

## **11. Exercising your rights**

Should you like to exercise any of your rights mentioned above, you may contact us by sending an email to [dpo\(at\)aalto.fi](mailto:dpo@aalto.fi). During the recruiting process, we request that you primarily contact the recruitment-specific HR contact person (contact details are included in the application notice).

In the Data Protection Regulation, the time limit for us to respond to your request is one month. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

## **12. Other rights**

### **Right to lodge a complaint with a supervisory authority**

- If the processing of your personal data is in breach of applicable legislation, you have the right to lodge a complaint with the national supervisory authority. You can lodge the complaint with a competent supervisory authority. In Finland, this is the Data Protection Ombudsman, and the complaint must be lodged in accordance with instructions provided by the Office of the Data Protection Ombudsman. Please see <http://www.tietosuoja.fi> for more information.

### **Right to be notified of a personal data breach**

- We have an obligation to notify directly the data subjects whose data are affected by a personal data breach. The right will take effect, if a violation is likely to result in a great risk to the rights and freedoms of the individual, for instance in the form of identity theft, fraud related to means of payment or other criminal activities

## **13. Your responsibility**

You are responsible for the information you submit or make available to Aalto University. You must ensure that the information is correct and accurate and not misleading in any way. Please make sure that your information does not contain material that infringes the rights of any third party or contains malicious software. Should you provide us with information on another person, such as your referees, it is your responsibility to ensure that you receive the consent required of the person concerned before providing the referee's name and contact details to Aalto University.

## **14. Amendments to the notice**

Aalto University will occasionally review and update this notice to respond to the constant legal, technical and operational changes. When a notice is updated, the date of the latest update will be indicated at the top of the notice. If we make substantive changes to this notice, we may take appropriate measures to inform you in a way that is consistent with respect to the significance of the changes. We encourage you to check this notice often to be aware of how Aalto University protects your data.

## **15. Who you can contact**

**Questions related to the use of the electronic recruitment system and other issues related to recruitment:** Contact the recruitment-specific HR contact designated in the notice.

**Data protection notice:** If you have questions or concerns about this data protection notice, please contact us by sending email to **dpo(at)aalto.fi** or by post to Aalto-yliopisto/kirjamo/Tietosuojavastaava (DPO), PL 11000, 00076 Aalto. Please refer to this privacy notice addressed to applicants in your message.