
**Global
Candidate
Privacy Policy**





Element Group Oy

Global Candidate Privacy Policy

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1. General

This policy is developed in accordance with the requirements of ISO 9001: 2015 standards and the recommendations of ISO 9004: 2018 standard.

The policy ("Policy") describes how The Element Group Oy Company and its subsidiaries and/or affiliates ("Element", "Company" or "we", "us", "our") will collect, use, disclose, transfer and store Candidate Personal Information. It also describes the Company's expectations for those who collect and manage Candidates' Personal Information.

This Policy is in line with Element's Company Values ("Values"). Element Group Oy, its subsidiaries and divisions globally are committed to protecting the personal information that Element obtains through our recruitment and hiring processes. The Company will comply with all laws and regulations, including local data protection and co-determination laws, and will implement additional procedures, standards, and policies wherever needed to meet these requirements. Accordingly, the actual Candidate Personal Information collected and/or accessed by Element Group Oy may differ from jurisdiction to jurisdiction to comply with local laws.

The Company expects its employees and any contractors, suppliers, agencies, temporary workers, or any other parties acting on Element's behalf (collectively, "External Parties") who collect or manage Candidate Personal Information to abide by the principles described in this Policy, whether they are utilizing Element's and/or their own electronic systems and data management tools. Element employees are responsible for ensuring that any External Parties they work with in support of Element operations comply with this Policy and with any additional specific standards and procedures that are applicable.

The Company makes reasonable efforts to ensure that Candidate Personal Information is reliable for its intended use.

Element may update this policy from time to time and will post the most recent version online.



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Normative references

ISO 9001:2015

Quality management systems – Requirements

ISO 9004:2018

Quality management – Quality of an organization – Guidance to achieve sustained success



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2. Terms, definitions, and acronyms

This standard uses the terms, definitions, and acronyms:

Table 1– Terms

Terms	Meaning of Terms
Candidate	Any individual who has provided Personal Information to Element in order to be considered for employment at the Company, including individuals who were previously employed by Element.
Personal Information	Any information relating to an identified or identifiable individual.
Sensitive Personal Information	Personal Information revealing race, ethnicity, political views, religion, health, sexual orientation, trade union membership, genetic or biometric data, information about criminal convictions and offenses, and as otherwise defined by relevant law.
The Company or Element	The Element Group Oy Company, its subsidiaries and/or affiliates.



3. Principles

Element's fundamental data processing principles are:

- Collect and manage the minimum amount of Candidate Personal Information necessary in order to: promote the Company as a potential employer and increase the number of Candidates; assess the Candidate's employment application; facilitate the Candidate's onboarding as an employee if an employment offer is extended and/or accepted; and keep the Candidate informed of additional roles of relevance to their employment interests and goals.
- Respect individual privacy.
- Comply with our Values and relevant laws.
- Follow appropriate standards and procedures when collecting and/or managing Candidate Personal Information.

4. Intent

The Policy describes how we process Candidate Personal Information, the types of information we collect; for what purposes we use it and on what legal or business basis; with whom we share it; and the choices you can make about our use of Candidate Personal Information. We also describe the measures we take to protect the security of Candidate Personal Information and how you can contact us about our privacy practices.

5. What Types of Candidate Personal Information Do We Collect?

We collect and manage the minimum amount of Candidate Personal Information in compliance with applicable legal requirements to promote Element as a potential employer and increase the number of Candidates; to assess the Candidate's employment application; to facilitate the Candidate's onboarding as an employee if an employment offer is extended and/or accepted; and to keep the Candidate informed of additional roles of relevance to their employment interests and goals.

Subject to applicable law, the Company may process different types of personal information collected from candidate or other sources where relevant to candidate's application in the applicable jurisdiction. The collection of information and access to such



information will vary depending on country-specific legal and/or business requirements. We will notify candidate at the point of collection whether the Candidate Personal Information that we request of candidate is required or is voluntary to proceed with candidate's recruitment process.

There are various stages in the collection of data during the recruitment process:

5.1. Stage 1: Data collected from a Candidate who has not yet commenced our recruitment process, but has expressed an interest in applying for employment at Element

Type of Data	Purpose for collecting and processing such data
Contact Information <ul style="list-style-type: none">• Full name or previous names (such as maiden names)• Honorifics and titles, including preferred name and salutation• Mailing address• Email address• Telephone number• Mobile number	Communicating with you about current and/or future career opportunities at Element.
Professional Data <ul style="list-style-type: none">• Resume or CV	Assessing your skills, qualifications, and interests against our career opportunities.
Digital Identification <ul style="list-style-type: none">• IP address• Cookies, tags and/or pixels	Efficiently delivering digital services through our recruiting and other corporate website(s).
Any other information required by law for employment compliance in countries of present	



5.2. Stage 2: Data collected from a Candidate who goes through stages of the recruitment process, before a decision is made on an application

Type of Data	Purpose for collecting and processing such data
Additional Professional Data <ul style="list-style-type: none">• Prior work history including references• Academic data such as education and degree information• Professional licenses, certifications and memberships and affiliations• Personal and professional skills (e.g., languages spoken), interests and hobbies• Professional goals and interests	To help us evaluate you against the specific requirements of the role(s) you are applying for.
Financial information <ul style="list-style-type: none">• Bank account information	To facilitate authorized expense reimbursement during the interview process.
Government ID/Work Eligibility Information <ul style="list-style-type: none">• National ID• Citizenship• Residency	To organize candidate's logistics to the office when the face-to-face interview will take place.
Reference check <ul style="list-style-type: none">• Colleagues and managers contacts from the previous place of work	Mandatory stage of the interview before sending a employment offer to the final candidate. Contact with referees takes place with the candidate's consent.



Type of Data	Purpose for collecting and processing such data
Any other information required by law for employment compliance	

5.3. Stage 3: Data collected after a Candidate accepts an employment offer, but before the first day of employment

Type of Data	Purpose for collecting and processing such data
<p>Additional Government ID/Work Eligibility Information</p> <ul style="list-style-type: none"> • Taxpayer’s reference number • Driver’s license number • Other government-issued identifiers as may be needed for compliance (e.g., work or immigration visas, or license numbers if you are a licensed professional) • Work visa 	<p>For security and risk management, such as collecting driver’s license data for employees who operate Company automobiles, professional license verification and similar purposes.</p>
<p>Personal Characteristics</p> <ul style="list-style-type: none"> • Date of birth • Place of birth • Preferred name and salutation 	<p>To enable multiple HR and employment purposes and activities of importance to you, your family, and/or your productivity at work, including setting up compensation and benefits and providing site/systems access.</p>
<p>Additional Financial Information</p> <ul style="list-style-type: none"> • Bank Account Number 	<p>To confirm the information provided in Stage 1 to set up payroll and reimbursement deposits.</p>
<p>Family/Dependents’ Information</p> <ul style="list-style-type: none"> • Name • Date of birth • Gender • Place of birth 	<p>To enable us to administer payroll and benefits programs and comply with applicable laws, such as reporting compensation to government agencies.</p>



Type of Data	Purpose for collecting and processing such data
<ul style="list-style-type: none">• Citizenship/nationality• Government ID• Contact information• Trade Union Membership Information	
Any other information required by law for employment compliance	

6. Obtaining Personal Information from Third Parties

If the Company obtains personal information from third parties, we will take reasonable steps to confirm that such personal information was collected lawfully where required to do so by applicable law. Some personal information which we collect may also be considered sensitive information or special category data under applicable law in relevant jurisdictions. If candidate provides us with personal information about other individuals (such as individuals listed as references), it is your responsibility to inform such individuals of their rights and to obtain their consent, where necessary under applicable law, to the processing (including transfer) of that personal information for the purposes set out in this policy.

7. Under What Legal and/or Business Basis Do We Process Candidate Personal Information?

In most countries, the primary legal and/or business basis for collecting and using Candidate Personal Information is your consent. In certain countries, the legal and/or business basis may also be pre-employment contract data processing requirements, our legitimate business interests, and/or to comply with legal obligations.

8. How Do We Share Candidate Personal Information?

Element will only share Candidate Personal Information with those who have a legitimate business interest to know.



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Element may share your information with External Parties who perform Element business operations on our behalf. The Company requires that External Parties provide equivalent levels of protection as applied by the Company when handling Candidate Personal Information. We contractually require External Parties acting as our data processors to only process the data in accordance with our instructions and to secure the data. These data processors may not otherwise use or disclose the information, except as authorized by Element, and/or to comply with legal requirements.

There are certain situations where you will be asked to share personal information directly with service providers connected to Element's recruiting or onboarding efforts, where Element does not control how your data is processed. In those situations, please ensure you read and understand the privacy policies and practices of such providers.

Candidate Personal Information may be shared with our Element headquarters and affiliates globally as necessary to fulfill employment-related purposes.

We may also disclose Candidate Personal Information if we are required to do so by law or legal process; to enforce or protect the rights and policies of Element; to assist in the investigation of suspected or actual misconduct or illegal activity; and/or as part of a sale of Element business to another company.

9. How Do We Secure Candidate Personal Information?

We have appropriate security measures designed to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

We limit access to your personal information to those employees, agents, contractors and other third parties who participate in employment process and are subject to confidentiality obligations.

10. How Long Do You Keep my Personal Information?

We will retain your personal information for 2 (two) years as a period necessary for the purposes described in this policy. Shortly before the end of a two-year period we will notify you about the expiry of consent and send you the repeated request on its renewal. In case the request is rejected, and consent is withdrawn, Element will delete your personal information.



11. What Are Your Privacy Rights?

Element processes your Candidate Personal Information primarily based on your consent. You may withdraw your consent to the processing of your Candidate Personal Information at any time during the recruitment process by emailing us at pro@element.global. Note that once consent is withdrawn, Element will delete your personal information and may no longer consider you for employment.

You have the right to contact us and request access to the Candidate Personal Information we may process and use about you. You may request that inaccurate, outdated or no longer necessary information be corrected, erased and/or restricted by contacting us at pro@element.global. Where permitted by applicable law, you may ask Element to provide your data in a format that allows you to transfer your data to a designated service provider, as appropriate in the circumstances.

12. Contact Information

The controller of your Candidate Personal Information is the Element Group Oy Company, including its subsidiaries and affiliates. If you have questions about your Candidate Personal Information, want to exercise any of your rights under applicable data protection laws or have concerns about a potential data breach, please email us at pro@element.global. For contact information specific to certain countries, see Addendum A to this Policy.



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Addendum A

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Contacts

European Union:

Element Group Oy
+358 10 340 3980
info@element.global

Russia and CIS countries:

Mining Element Ltd.
+7 (812) 900-85-70
pro@element.global

Chinese People's Republic:

Element (Shanghai) Equipment Ltd.
+86 17721301570
china@element.global