PRIVACY POLICY
PROFESSIONAL CONNECTIONS IRL OY

Professional Connections IRL Oy (”ProfCo”, “we” or “us”) respects your privacy and are dedicated to protecting the privacy of persons when using ProfCo’s recruitment services, webpages and other services provided by ProfCo (“Services”). This Privacy Policy helps you to understand what personal data we collect, and how we use it.

Personal data, data subject, controller and other key terms are defined in the General Data Protection Regulation (2016/679, “GDPR”). The company complies with the GDPR in all processing of personal data in conjunction with other applicable national data protection legislation (“data protection legislation”).

Our Services may also contain links to external websites and services operated by other organizations that we do not manage. This privacy policy is not applicable to their use, so we encourage you to review the privacy policies that apply to them. We are not responsible for the privacy policies of other websites or external services.

1. CONTROLLER AND CONTACT INFORMATION

Professional Connections IRL Oy
Business ID: 1086027-4
Address: c/o Spaces, Mannerheiminaukio 1 A, 00100 Helsinki, Finland
Email: gdpr@profco.com

2. LEGAL BASIS AND PURPOSE OF THE PROCESSING OF PERSONAL DATA

We process personal data that is necessary only for the purposes set out below. The legal basis for the processing of personal data is, where not stated otherwise or another legal basis is otherwise applicable, the performance of the contract for providing our’ Services. We can also process your personal data where we have a legitimate interest to do so, such as for marketing purposes. Where we rely on legitimate interests as a reason and legal basis for processing personal data, we have considered whether or not those interests are overridden by the rights and freedoms of the data subjects and we have concluded that they are not.

Where the processing is such that a consent is required by the applicable legislation, we will state so and obtain the consent, and this will be the legal basis for the processing. However, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. If such withdrawal means that we are no longer able to provide the Services, we may cease to provide the Services.

Personal data will be processed for the following purposes:

- providing and development of the Services
- handling inquiries related to Services
- customer service and communication
- processing customer order information and monitoring payment status
- tracking website traffic

- management of legal obligations (e.g. accounting and other legislation) and reporting obligations, such as reporting related to tax legislation
- prevention of abuse

We will use the recruitment process data submitted to:

- evaluating your job application;
- reviewing your qualifications and assist our clients in making hiring decisions;
- communicating with you in relation to the recruitment;
- matching the qualifications to any opening positions within the given time frame;
- forwarding the information you provided to prospective employers
- producing recruitment statistics

3. PERSONAL DATA PROCESSED AND SOURCES OF INFORMATION

Personal data collected and processed by ProfCo is mainly collected directly from the customer or applicant. ProfCo will only collect such personal data that is relevant for the purposes described in this privacy policy, including information you give to us, and technically gathered information when you use our Services.

While the provisioning of certain personal data is necessary for the use of our Services, certain personal data is provided voluntarily. Personal data may be updated and supplemented by collecting data from private and public sources, such as commercially available directories and websites.

Personal data and non-personal data are collected directly from you, such as through registration, recruitment application forms, recruitment consent forms or by logging the activities in the Services. This data may include:

Category of personal data	Examples of information content
Information gathered at registration/or during the recruitment process*	• name • email address • demographic information • education • work history and skills • gender • date of birth or age • language(s) • title or degree • education • declaration of your interests • country/location and the job you are interested in to work • passport copy • medical reports • record of correspondence including calls • police clearances

	• bank account details if needed for reimbursements • other personal data possibly include in CVs and cover letters and pictures provided to us If you were requested to take any tests as a part of the recruitment process, such as, but not limited to cognitive ability test, the test result data may be processed as a part of our recruitment decision-making process.
Technical behavioural data and identification data	Monitoring the data subject's web behaviour and use of Services, for example by means of cookies or similar technical identification data. Examples of data that can be collected include unique device identifiers, IP addresses, device software version numbers and identifiers, and rough location information via GPS, IP address or mobile networks.
Rights management of the data subject, such as consents and prohibitions	Marketing prohibitions and consents. Consents regarding sharing of personal data with prospective employers both EU & non-EU. Communication and measures relating to the rights of the data subject (see the rights of the data subject below).
Other (additional) information provided voluntarily	Preferences related to the contract or marketing / marketing event. Other additional information provided in contacts or appointments.

*sections thus marked are necessary to provide the Services and fulfil legal obligations. Furthermore, the blocking or the non-provisioning of certain personal data may affect the proper functioning of the Services or ProfCo may not be able to provide the Services if said data is not provided.

If you do not provide ProfCo the required information, this may mean that We are not able to provide the Services to you, perform the contract necessary for the provisioning of the Services or to comply with ProfCo' legal obligations.

We may collect your personal data also from publicly available sources (such as LinkedIn). If background checks are included in the process, we will receive necessary data from qualified vendors. If reference checks are included in the process, we will also collect your personal data from the persons you have indicated as appropriate references in your application process.

4. RETENTION OF PERSONAL DATA

The personal data we collect is retained for the period necessary to fulfil the purposes outlined in this privacy policy unless a longer retention period is required by law. Thereafter, the personal data will be deleted within a reasonable timeframe or rendered anonymous. The retention periods depend on the purpose of the processing and type of the information. Personal data and retention periods are listed in the table below:

Personal Data	Retention period or criteria used to determine the period

Customer data	As long as necessary to fulfill the purpose personal data has been gathered for or as required by applicable laws.
Technically gathered data	As long as necessary to fulfill the purpose personal data has been gathered for or as required by applicable laws.
Recruitment data	We store and process your personal data for recruitment purposes for [12] months after you have submitted your application. You may at any time withdraw your consent by contacting us at the contact details given herein. In case you withdraw your consent for processing your personal data for further recruitment purposes, we will no longer store or process your personal data for the purpose of possible future recruitment processes. However, we may still store, and process certain personal data used for the initial recruitment process, if we have lawful grounds to store and process such data.

ProfCo keeps the personal data for as long as necessary for the performance of a contract and as required by retention requirements set out by applicable laws and regulations. Where ProfCo keeps the personal data for other purposes than those of the performance of a contract, such as for bookkeeping, ProfCo keeps the data only if necessary and/or mandated by laws and regulations for the respective purpose.

5. RECIPIENTS OF PERSONAL DATA

ProfCo will not disclose personal data to third parties unless there is a justified reason, legitimate interest, or express consent. We regularly transfer your personal data to prospective employers. Personal data may be disclosed to third authorized third party processors who process the data for us and IT and technical service providers. All such processing is based on our prior instructions set out in a binding contract that is compliant with the requirements of applicable law.

The personal data may also be disclosed to third parties if required under any applicable law or regulation or order by competent authorities, and to investigate possible infringing use of the Services as well as to ensure the safety of the Services. In addition, personal data may have to be disclosed in connection with legal proceedings or for similar dispute resolution purposes., in case of sale, consolidation or reorganization of our businesses (for example mergers and acquisitions).

Some of the services used by ProfCo for processing personal data operate outside the territory of the European Union or the European Economic Area. Thus, personal data can be transferred regularly outside the European Union (EU) and the European Economic Area (EEA). In cases where personal data is transferred outside EU/EEA, such transfers are either made to a country that is either deemed to provide a sufficient level of privacy protection by the European Commission or transfers are carried out by using appropriate safeguards such as the Standard Contractual Clauses approved by the EU Commission ensuring also that the data processing and confidentiality fulfills the requirements under applicable laws.

Furthermore, in connection with providing our Services with regard to recruitment, we provide your data to prospective employers located outside of EU/EEA where the importer of data is located in a country not deemed to provide a sufficient level of privacy protection by the European Commission and no other appropriate safeguards such as the EU's Standard Contractual Clauses are available. Therefore, your personal data may be transferred across international borders outside your domicile

or the country in which we offer our Services to you based also on your specific consent.

We will provide more information regarding the processing upon request.

6. PROTECTION OF PERSONAL DATA

We use appropriate technical, administrative and organizational security measures to protect personal data against unauthorized access, disclosure, destruction or other unauthorized processing: firewalls, proper access control, controlled provision of access and monitoring of use, and the use of encryption technologies are also in use. The servers are located in the EU. Network services are protected by a HTTPS connection, which encrypts communications.

All parties processing personal data have a duty of confidentiality in matters related to the processing of personal data. Access to personal data is restricted to those employees and parties who need it to perform their duties. We also require our service providers to have appropriate methods in place to protect personal data.

7. RIGHTS OF THE DATA SUBJECTS AND SUPERVISORY AUTHORITY

Right to access, rectification and erasure

You have the right to contact us, and we will inform you what Personal Data We have stored regarding you, and the purposes such data is used for.

You may also ask us to delete your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data. After the data has been deleted, we may not immediately be able to delete all residual copies from all of our systems. Such copies shall be deleted as soon as reasonably possible.

Right to Object or Restrict Processing

You may object to certain use of personal data when such processing is based on legitimate interest, including direct marketing or profiling. You may opt-out of receiving promotional emails by following the instructions in those emails. If you opt-out, we may still send you non-promotional customer information, such as emails about your account, providing our services and products or our ongoing relationship with you.

You may request that we restrict processing of certain personal data. Your personal data will then only be stored and not processed otherwise; this may however lead to fewer possibilities to use the Services. If such restriction means that we are no longer able to provide the Services to you, we shall be entitled to stop providing the Services.

Right to data portability

You have the right to receive personal data provided by you to us in a structured, commonly used format. We provide no guarantee that this information will be compatible, relevant or useful to any other service.

Withdrawal of consent

You can deny any direct marketing and withdraw your consent regarding electronic direct marketing. You can always withdraw any other consent including parental consent.

How to exercise your rights

These rights may be used by sending an e-mail to the addresses set out below. Your identity will be verified before the information is given out, which is why we may have to ask for necessary additional details. We will respond to the request within a reasonable amount of time and, where possible, within one month of the request and the verification of your identity. If your request cannot be met, the refusal shall be communicated to you in writing. ProfCo may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

Right to lodge a complaint with the supervisory authority

In case you consider our processing activities of your Personal Data to be inconsistent with the General Data Protection Regulation (GDPR) (EU) 2016/679 or other applicable data protection legislation, you have the right to complain to the applicable data protection supervisory authorities.

8. CONSENT TO USE OF AI TOOLS

By submitting your information, you acknowledge and consent that Professional Connections (Profco) may use trusted third-party AI tools to assist with recruitment processes, communication, and service delivery. All processing will comply with Finnish law and GDPR, ensuring appropriate safeguards for privacy and data protection.

9. CHANGES TO THIS PRIVACY POLICY

ProfCo may make changes to this privacy policy at any time by giving a notice on the website and/or by other applicable means. The data subjects are highly recommended to review the privacy policy on our website every now and then.

Date: 26/11/2025