

Description of Data Processing regarding staff members

Controller	<p>Haltian Oy</p> <p>Yrttipellontie 1D 90230 Oulu Finland</p>
Contact Information	<p>privacy@haltian.com</p>
Categories of personal data and data subjects	<p>Categories of Personal Data. We process personal data provided by you or received from other sources based on e.g., legal obligation (such as tax administration registers or occupational health care service provider):</p> <ul style="list-style-type: none"> • Basic Information, such as name and contact information • Agreement related information, such as employment or service agreement related information • Time Tracking information • Payment and/or payroll related information • Occupational Health Care information • Inquiries, such as information related to communication. <p>In addition, we observe the following information from the usage of the services we use, including Haltian website:</p> <ul style="list-style-type: none"> • Usage data. When you use services used by us, the services may collect usage information such as content of your account, registration log, login/logout, time stamps of usage activities. <p>The categories of data subjects are the following:</p> <ul style="list-style-type: none"> • Employees • Consultants, advisors, and other people working for us.
The legal basis and purposes of the processing	<p>Legal basis.</p> <p>Agreement. We use your personal data to fulfil the contractual obligations. This requires us to process your data for the employment/consultancy/advisor relationship management, support, and communication.</p> <p>Legal obligations. Time tracking, payroll related obligations as well as processing of occupational health care service information are based on legal obligations.</p> <p>Legitimate Interest. We process your personal data for the following purposes based on legitimate interests pursued by us:</p> <ul style="list-style-type: none"> • Analytics and development purposes • Communicating purposes • Information and account security purposes, including detecting or preventing various types of misuse of services and fraud to provide you with secure and reliable services. • Communication via email. We may send you electronic direct marketing, such as newsletters, promotions about new products as well as information about user surveys and trials, by email. You can opt-

	<p>out such electronic direct marketing or communication at any time free of charge by clicking on the “unsubscribe” link included in our newsletters, adjusting the settings of your user account, or by contacting us directly.</p> <p>Purposes of the processing:</p> <ul style="list-style-type: none"> • To fulfil contractual obligations • To meet the legal obligations e.g., under labor legislation • Analytics and development • Communicating • Information security, including detecting and preventing misuse or services.
<p>Sharing of personal data</p>	<ul style="list-style-type: none"> - Our third-party vendors, who provide us with cloud-based IT and business support. All such third parties are operating under contract and acting on behalf of us. - Competent authorities. When required under employment legislation, in response to a legal process or request from a competent authority according to applicable laws or in connection with a legal proceeding or process. - Mergers, acquisitions, or sale of assets. When required as part of a merger, acquisition, sale of assets (such as service agreements) or transition of service to a group entity or another company.
<p>International Transfers</p>	<p>When transferring and disclosing your data outside the EU/EEA in above mentioned situations, where the local law may not provide the same level of protection, we comply with applicable legal requirements for providing adequate safeguards to such transfer by e.g. using the European Commission's Standard Contractual Clauses (SCC).</p>