

BBTP PLATFORM PRIVACY NOTICE

1 GENERAL

1.1 The purpose of this privacy notice is to provide the information required by the General Data Protection Regulation (2016/679, "**GDPR**") on how Best Best Talent Platform Oy ("**BBTP**") collects and processes personal data in relation to the use of the BBTP Platform ("**Platform**").

1.2 The data subjects referred to in this notice include persons who have submitted their personal data in order to use the Platform (hereinafter "**Candidates**"), whether independently or through/as employees of an Interim Manager Provider, as well as the representatives of the Clients, Partners and Interim Manager Providers (as such terms are defined in the Platform Terms), collectively "**Users**".

1.3 If the Interim Manager Providers, Partners or Clients process any personal data for their own purposes, such as for concluding an assignment agreement with a Candidate or assessing a Candidate's suitability for an Assignment (as defined in the Platform Terms), the Interim Manager Provider, Client or the Partner in question is the data controller for such personal data.

2 DATA CONTROLLER AND CONTACT DETAILS

2.1 BBTP will act as the data controller with respect to the Platform subscription related personal data (including e.g. names, contact details, login information and payment details) as well as other personal data described in section 3 below that is collected or received in connection with a Candidates' and other Users' use of the Platform and entering into a subscription agreement and registering an account in the Platform and managing the Platform subscription.

The representative of the data controller and the contact details:

- Best Best Talent Platform Oy (business ID: 2763172-6)
- Address: c/o Innovation Home, Tekniikantie 2, 01250 Espoo, Finland
- Representative: Elina Liehu
- Email: bbtp.contact@BestBestTalentPlatform.com

3 CATEGORIES OF PERSONAL DATA, PURPOSES OF PROCESSING AND APPLICABLE LEGAL BASIS FOR PROCESSING

The following table provides a summary of the different purposes of uses and the applicable legal bases as well as the categories of personal data processed:

Purpose of Use	Legal Basis	Categories of Personal Data
To enter into a subscription agreement for the	The performance of a contract when entering into a subscription agreement with a	Name, date of birth and contact details, for example an e-mail address, phone

provisioning of the Platform. To provide the Platform to the Users.	<p>Candidate or other User, and when providing the Platform to the Users</p> <p>Legitimate interest of the data controller for the personal data of the representatives of the Users where they are not parties to the subscription agreement</p>	<p>number, organisation, and title</p> <p>Account and login management (username and password)</p> <p>Information on the Candidate's education, skills, portfolio, professional experience, and photograph</p> <p>Information on the Candidate's preferences</p>
To send invoices and manage financial obligations regarding subscription and use of the Platform	<p>The performance of a contract</p> <p>Legal obligation of the data controller</p> <p>Legitimate interest of the data controller</p>	<p>Name and contact details, for example an e-mail address, phone number</p> <p>Bank account number, credit card or other payment method details</p>
To communicate with data subjects, including sending marketing material to persons using the Platform and to provide customer service and support	<p>The performance of a contract for a provision of customer service</p> <p>Legitimate interests of the controller for direct marketing (if applicable)</p> <p>Consent of the data subject prior sending electronic direct marketing (if applicable)</p>	<p>Name and contact details, for example an e-mail address, and phone number</p> <p>Marketing permissions and marketing bans</p> <p>Customer service contact messages and summary of customer service history, if necessary</p>

Personal data is not for used automated decision-making, including profiling, as referred to in the Article 22 of the GDPR.

4 SOURCES OF PERSONAL DATA

4.1 The personal data regarding a Candidate is collected mainly from the Candidate himself/herself when the Candidate enters into a subscription agreement with BBTP as well as when the Candidate uploads the personal data to the Platform, applies for an Assignment or otherwise communicates with the Platform. BBTP may also collect the Candidate's personal data from an Interim Manager Provider. BBTP also collects personal data concerning the Client's, Interim Manager Provider's and/or Partner's representative when the Client, Interim Manager Provider or the Partner in question enters into a subscription agreement with BBTP or uses the Platform. BBTP may also retrieve information public sources such as the Finnish Business Information System.

- 4.2 If the Candidate or the representative of the Client, Interim Manager Provider or Partner intending to use the Platform does not provide their personal data necessary for entering into a subscription agreement with BBTP, BBTP cannot enter into a subscription agreement with the Candidate or the entity in question. The provision of other personal data, such as information on education and work experience, is voluntary for Candidates, unless required by law, although the use of the Platform may be limited in such cases.

5 RETENTION OF PERSONAL DATA

- 5.1 The personal data in relation to the use of the Platform will be retained for the duration of the subscription period and for a reasonable time after in accordance with GDPR and applicable laws. In some cases, BBTP retains the personal data after the subscription period as permitted and obligated by law, for instance for the period required by accounting or other applicable mandatory laws or in order to exercise and defend a legal claim. This includes in particular (but not limited to) situations where the Candidate has been selected for the Assignment. The data subject can object to processing of their data or withdraw their consent during this period or prior to it, subject to applicable mandatory laws, which may require BBTP to retain certain data. Furthermore, the Candidates acknowledge that the Partners and Clients may retain data of the Candidates who have applied for their Assignments subject to laws applicable to them and their respective privacy policies. In such cases, the respective Partner and/or Client is the data controller as described in section 1.3 above.
- 5.2 The personal data relating to marketing activities will be retained for as long as the data subject has given the consent to receive marketing material. The personal data will be deleted when the data subject withdraws the consent or otherwise objects to the related processing of the personal data.

6 RECIPIENTS OR CATEGORIES OF RECIPIENTS

- 6.1 The personal data of the Candidate may be disclosed to Clients or Partners, as applicable, for the purposes determined by the Client or the Partner in question, in particular in order for the Candidate to be considered for an Assignment and for carrying out the Assignment. The Candidate can select the Assignments that he/she is interested in and for which he/she wishes his/her personal data to be disclosed.
- 6.2 The personal data of the Candidates and the representatives of the Clients, Interim Manager Providers and Partners in relation to the use of the Platform may be disclosed to external service providers, such as third-party payment service and invoicing service providers and data processors, including cloud storage providers (including Amazon Web Services) and providers of IT support services in order to provide the Platform. BBTP enters into data processing agreements with external service providers who process personal data on behalf of BBTP.
- 6.3 Personal data may also be disclosed to authorities, such as the police, courts, law firms and other similar entities, when permitted or obligated by law or for the purposes of exercising and defending a legal claim.

- 6.4 If BBTP is involved in a corporate transaction personal data may be disclosed to third parties in relation to such transaction in accordance with the applicable data protection laws.

7 TRANSFER OF PERSONAL DATA

- 7.1 As a rule, BBTP or its data processors do not transfer personal data outside the EU or the EEA. If any exceptions to the above prove necessary, BBTP ensures that such transfers are subject to appropriate safeguards as required by GDPR, such as the applicable standard contractual clauses. The data subject has the right to obtain a copy of the relevant appropriate safeguards (if applicable) by contacting BBTP in accordance with the contact details under section 2.1.

8 RIGHTS OF THE DATA SUBJECT

8.1 Right of Access and Right to Data Portability

The data subject has the right to receive a confirmation from BBTP as to whether personal data concerning the data subject is being processed, or whether personal data has been processed. Where BBTP processes personal data concerning the data subject, the data subject has the right to receive the information contained in this document and a copy of the processed personal data and the personal data undergoing processing. BBTP may charge a reasonable administrative fee for any additional copies requested by the data subject. If the data subject makes the request electronically, the information shall be provided in a commonly used electronic form, unless otherwise requested by the data subject. Furthermore, under the GDPR the data subject may in certain circumstances request the transmission of the personal data, which he or she has provided to BBTP, to himself or herself or to another controller in a machine-readable format.

8.2 Right of Rectification, Right of Erasure and Right to Object to Processing

The data subject also has the right to request from BBTP rectification or in certain cases erasure of personal data concerning him or her. In certain cases, the data subject also has the right to request the restriction of processing of personal data or otherwise object to processing.

8.3 Right to Withdraw Consent

Where BBTP processes personal data of the data subject on the basis of his or her consent, the data subject has the right to withdraw his or her consent. The withdrawal of consent does not affect the lawfulness of processing based on consent prior to withdrawal.

8.4 The Right to Lodge a Complaint with the Supervisory Authority

In the case where the data subject finds the processing of his or her personal data unlawful, he or she has the right to lodge a complaint with the competent supervisory authority. In Finland, the supervisory authority is the Office of the Data Protection Ombudsman with the following contact details:

Street address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: PL 800, 00531 Helsinki, Finland

Email: tietosuoja@om.fi

8.5 Using the Rights

All the requests mentioned herein shall be provided to the representative of BBTP mentioned in section 2.1 of this privacy notice.

9 SECURITY OF PROCESSING

9.1 BBTP has taken and maintains the necessary technical and organisational measures to ensure the security of processing and adequate level of data security. Access to the personal data is limited only to such persons for whom access is necessary in the performance of their tasks and who are bound by confidentiality.

10 CHANGES TO THIS PRIVACY NOTICE

The BBTP may change this privacy notice from time to time. This privacy notice was last updated on 23 Nov. 2022.