



Bank of Finland

**Memorandum**

1 (4)

28 October 2022

**Unrestricted**

## Privacy statement

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| This Privacy Statement has been published on the Bank of Finland's website <a href="http://www.suomenpankki.fi/data-protection/">www.suomenpankki.fi/data-protection/</a> .  |
| <b>1. Name of the personal data file system</b>  |
| LAURA recruitment system   |
| <b>2. Name and contact details of controller and contact details of data protection officer</b>  |
| Bank of Finland<br>Business ID 0202248-1<br>PO Box 160<br>00101 Helsinki<br><br>Contact details of the person responsible for the personal data file system:<br>Antti Vuorinen<br>Email: antti.vuorinen(at)bof.fi<br>Tel. +358 9 1831 (switchboard)<br><br>Contact details of the data protection officer:<br>Email: tietosuojaavastaava(at)bof.fi<br>Tel. +358 9 1831 (switchboard)   |
| <b>3. Purpose of the processing of personal data and the legal basis for the processing</b>  |
| The personal data file system is for discharging the employer duties in use in the Bank of Finland and the Financial Supervisory Authority (FIN-FSA). It is used to receive and process job applications.<br>The purpose of the personal data file system is: <ul style="list-style-type: none"><li>– to notify job applicants of vacant positions in the Bank of Finland and the FIN-FSA.</li><li>– to process applications in document and video interview form for the filling of positions</li><li>– to interact with job applicants, e.g. sending information about application stages</li><li>– to prepare a comparison table of information reported by job applicants</li><li>– to collect a bank of open applications from the open applications of internal applicants (registration for job rotation)</li><li>– to report key figures on personnel recruitment, for example the number of open positions in the Bank of Finland and the FIN-FSA and the number of applications received</li></ul> |



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#### 4. Categories of data subjects and categories of personal data

Categories of data subjects:

- Job applicants

Categories of personal data:

- Applicant's identification information (name, date of birth, street address, telephone number, email address, gender (said information only for statistical purposes))
- Applicant's education information (basic education, qualifications and their fields, year of completion of studies, degree of completion of studies in progress, language skills and courses)
- Applicant's work experience (details of three jobs/public-service employment relationships, employers, duration of jobs/public-service employment relationships and brief job descriptions)
- Self-presentation (job applicant's free-form presentation of him/herself, skills and work experience), video recording of videos of applicant and interviewer. In addition to video and audio, information about the date and time of the event will be stored in the personal data file system.
- Open internal application for internal job rotation (information saved in the personal data file system is provided by the applicants themselves).

Job applicants save information about themselves in the personal data file system using application forms. Applications submitted elsewhere than via the LAURA system are saved in the system manually.

Supervisors responsible for recruitment and personnel officers responsible for recruitment enter into the personal data file system recruitment process information, for example the progress of the recruitment process, those invited for interviews and personal assessments, the identifying information of the person selected for the position, and the stage of any background check and pre-employment physical examination .

The supervisor responsible for recruitment or a person authorised by him or her is responsible for saving into the personal data file system additional information necessary for filling the position. In the saving of information, the following are taken into consideration: the Act on the Employees of the Bank of Finland, the Data Protection Act, the Act of the Protection of Privacy in Working Life and the Act on the Openness of Government Activities.



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### 5. Recipients or categories of recipients of the personal data

Disclosure of data is subject to laws and regulations. Data is not disclosed for direct marketing from the personal data file system. As a rule, data is not disclosed to external parties from the personal data file system.

The recruitment system is administered by LAURA rekrytointi Oy and the video service is administered by RecRight Oy, which act as processors of personal data.

### 6. Notification of possible transfer of personal data to a third country or an international organisation

Data are not transferred outside the EU or the EEA or to international organisations.

### 7. Period for which the personal data will be stored or the criteria used to determine that period

A job applicant's application is stored in the system for two years from the submission of the application or an update made by the applicant. Open applications of individuals registered for internal job rotation are deleted from the personal data file system two years after their storage or updating, unless the application extends the storage period.

Data are deleted from the video service (RecRight Oy) two years after a video is made.

The application data of persons selected for a position are stored in the official journals of the Bank of Finland and the FIN-FSA under the Act on the Openness of Government Activities.

Archival and destruction of data are subject to the applicable provisions and regulations.

### 8. General description of technical and organisational security measures

In order to protect personal data against unauthorised access, disclosure, destruction or other unlawful processing, appropriate technical and organisational security measures are used, taking potential risks into consideration. These measures include the use of secure equipment premises as well as administrative and technical information security solutions.



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#### 9. Rights of data subjects

The data subjects in the personal data file system have the right:

- to request from the controller access to personal data concerning them and the restriction or erasure of such data or to object to processing as well as the right to transfer data from one system to another.
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- to lodge a complaint about the processing of personal data with a supervisory authority.

#### 10. Statutory or contractual requirement to provide data and consequences of failure to provide such data

If an applicant does not provide personal data, his or her application cannot be processed.