

Privacy notice for job applicants

Huhtamäki Oyj and its subsidiaries, associated companies and other affiliates (later referred to as “Huhtamaki” or “Group”) respects the privacy of its job applicants. This privacy notice (“Privacy Notice”) describes the measures Huhtamaki takes to ensure the privacy and security of information collected and processed by Huhtamaki.

1 Data controller

In respect of each data subject’s personal data, the data controller is regarded to be the Huhtamaki group company or independently each group company organizing the recruitment. The data controller may, thus, be either Huhtamäki Oyj (business ID 0140879-6) or any of its subsidiaries or associated companies.

For avoidance of doubt, in this Privacy Notice “we” or “Huhtamaki” shall refer to any Huhtamaki group company acting as the data controller in each individual case.

2 Contact details for Huhtamaki in matters concerning this Privacy Notice

Where the data subject has questions regarding this Privacy Notice or he/she wishes to exercise his/her rights, the data subject should contact the Huhtamaki group company, which is organizing the recruitment or people_processes_and_applications@huhtamaki.com.

3 Lawfulness of processing personal data

The processing of the personal data is primarily based on the data controller’s legitimate interest in carrying out recruitment activities, as well as the relationship between Huhtamaki and the applicant participating in the recruiting process. In certain cases, the processing of the personal data is necessary for the purpose of taking steps to entering into an employment contract or making an employment offer. In addition, Huhtamaki may be required to collect and process certain personal data in order to comply with statutory obligations.

Furthermore, applicable local legislation may impose additional requirements on the data controller to obtain the applicant’s consent for the processing of specific types of personal data or for certain processing activities. For example, consent may be required for conducting aptitude assessments and background checks.

4 Purposes for processing of personal data

Personal data is processed for purposes of receiving and handling applications from job applicants for recruitment and selection purposes. These applications can be open applications or intended for a certain specific job opening. In such cases Huhtamaki may also consider job applications for other similar positions within the Group, as applicable. The job applicant has a right to object to such further processing of his/her application. The applicants filing the job applications can be internal (i.e. Huhtamaki’s current employees) or applicants not currently employed by Huhtamaki.

Huhtamaki may also process personal data to fulfil Huhtamaki’s statutory obligations. Such obligations may relate to e.g. proving that the recruitment decisions have been non-discriminatory.

Huhtamaki may outsource certain data processing activities to third parties. In such cases, these third

parties act as data processors and process personal data on behalf of Huhtamaki and in accordance with its instructions. For example, personal data may be processed by external recruitment consultants who support Huhtamaki in applicant screening, assessments, and other recruitment-related activities, or by external IT service providers managing the online application system. In certain situations, however, third parties involved in the recruitment process (such as recruitment consultants) may also act as independent data controllers with respect to their own processing activities, in accordance with applicable laws and regulations.

5 Categories of personal data we process

The following information may be obtained from job applicants applying for a position at Huhtamaki:

- **Basic personal information**, including name, contact information, date of birth and other similar information necessary for identifying applicants and verifying eligibility to work;
- **Application documents and materials provided by the job applicant**, such as a cover letter, CV (including, for example, applicant's education and work experience information, language skills, expertise, references), as well as certificates;
- **Suitability questionnaires and self-evaluation records**, where applicable;
- **Other relevant application-related information**, such as applicant assessment reports prepared by recruitment consultants, which the job applicants may want to disclose to Huhtamaki in connection with their job application; and
- **Background check information**, such as information obtained through security clearances or similar information sources, subject to the applicable laws and regulations and applicants' consent.

Personal data is only processed to the extent necessary, taking into account the nature and requirements of the position for which the applicant is being considered and the related duties.

If a job applicant chooses not to provide the requested personal data, Huhtamaki may be unable to consider the applicant in the recruitment process.

6 Regular sources of information

In general, Huhtamaki receives personal data processed during the recruitment process directly from the job applicant. The applicant submits their application or résumé via an electronic recruitment tool or by email to Huhtamaki or to an agency acting on its behalf, thereby registering as an applicant. In addition, applicants may also express their interest in Huhtamaki through LinkedIn.

Subject to the applicants' consent, information may also be obtained from other sources, such as referees and recruitment consultants involved in interviewing candidates and conducting applicant assessments as a part of the recruitment process. In addition, where permitted by applicable laws and regulations and based on applicants' consent, information may be collected through background checks, security clearances and other similar sources deemed necessary due to the nature and security requirements of the position.

7 Data retention

Huhtamaki actively processes the personal data of applicants during the recruitment process. Personal data related to a specific position is retained for twelve (12) months following the completion of the

relevant recruitment process, after which it is deleted. Candidate profiles without active applications are retained for six (6) months from the latest login, after which they are deleted. Different retention periods may apply where required by applicable law.

If a job applicant wishes to obtain further information regarding retention periods, they may contact Huhtamaki as instructed in Section 2 of this Privacy Notice.

If an applicant is selected for the position, the basic information, together with other data relevant to the employment relationship, will be transferred to Huhtamaki's employee information register.

8 Regular data disclosure

The personal data of the job applicant is accessed by Human Resources professionals and by other persons who participate in the selection process at Huhtamaki. Huhtamaki may share personal data of the job applicant globally between the different entities within the Group and may also consider the job application for other similar positions, as applicable. The job applicant has a right to object to such further processing of his/her application. Further, Huhtamaki uses the services of third-party service providers to perform tasks related to the job applicant's personal data. Such services may include e.g. processing activities conducted by external recruitment consultants, assessment partners and background check providers. Huhtamaki may share personal data with such third-party service providers who process personal data on behalf of Huhtamaki and in accordance with the instructions of Huhtamaki.

9 International transfers of personal data

Huhtamaki operates globally and a job applicant's personal data may be transferred across national borders for the purposes described in this Notice.

A job applicant's personal data may be transferred to countries that have different levels of data protection laws than the country in which the job applicant is located (a list of countries with Group companies to which personal data may be transferred is available at <http://www.huhtamaki.com/contact-us/locations>). Huhtamaki takes appropriate measures to maintain the security of personal data both during transit and at the receiving location, and to ensure that the data is managed in accordance with applicable laws and regulations.

Data transfers from the EU/EEA to a country outside the EU/EEA, or data transfers across national borders outside the EU/EEA, are undertaken in accordance with applicable laws and regulations. To ensure that personal data is protected, appropriate safeguards are put in place in relation to service providers that handle a job applicant's personal data outside the EU/EEA, for example by way of data transfer agreements (including standard data protection clauses adopted by the European Commission). More information on such international data transfers and the safeguards applied may be obtained from persons participating in the recruitment process at Huhtamaki.

In processing personal data, Huhtamaki may use servers and other technical facilities located outside the country in which the recruitment takes place or where the job applicant is located. Where such facilities are provided by a third party, the service provider is bound by a contract ensuring that the personal data is managed in accordance with applicable laws and regulations, that the provider acts only on the data controller's instructions, and that all necessary technical and organizational measures are implemented on an ongoing basis to keep the personal data secure.

10 Your rights

Job applicants have rights with regards to their personal data, including:

- **Right of access** – you are entitled to have information concerning the personal data that is processed as well as a copy of such data.
- **Right to rectification** – you have a right to have inaccuracies related to your personal data corrected or completed.
- **Right to erasure** – you have the right to require the data controller to delete your personal data if the continued processing of that data is not justified.

You can have your personal data erased under the following circumstances;

- If the personal data is no longer necessary in relation to the purposes for which it were collected or otherwise is processed;
- If our processing of the personal data can only be carried out based on your consent; if you withdraw such consent;
- If our processing is based on legitimate interest, you have objected to the processing and there are no overriding legitimate grounds for the processing;
- If your personal data has been unlawfully processed; and
- If your personal data has to be erased for compliance with a legal obligation in Union or Member State law to which we are subject.

The right to erasure does not apply when our processing of your personal data is necessary for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires the processing; or for the establishment, exercise or defense of legal claims.

- **Right to withdraw consent** (when processing is based on consent) – in order for a consent to be valid, it needs to be withdrawable, and the individual has the right for such withdrawal at any time.
- **Right to data portability** – under certain conditions, you may require your personal data to be ported to yourself or to another company in a commonly used machine-readable format.
- **Right to restrict processing** – you have, in some situations, the right to limit the processing of your data to some purposes. This means that the data controller must refrain from using the data during the period for which the right applies.

Under the following circumstances, you can request that we restrict the processing of your personal data to only involve the storage of your personal data;

- If you contest the accuracy of the personal data, we will restrict processing for the time required to verify its' accuracy.
- If the processing is unlawful, you may oppose the erasure of the personal data and request that its' use is instead restricted.
- If we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims, you have the right for the processing to be restricted.
- If you have objected to processing, you have a right to restriction pending the

verification of whether our legitimate grounds override your interests.

- We may, however, still use your personal data for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
- **Right to lodge a complaint with the supervisory authority** – you have the right to lodge a complaint with the competent supervisory authority as described in the local laws and regulations.

Object to specific processing

You can object to processing of your personal data if it is based on a legitimate interest, on grounds relating to your particular situation or if the processing takes place for direct marketing purposes. Upon such an objection, we are obliged to cease the processing, unless we can demonstrate compelling legitimate grounds to continue processing and those grounds override your interests. We may also continue processing that is necessary to establish, exercise and defend legal claims.

Processing for the purpose of direct marketing will, however, always be ceased upon your objection.

If you object to processing of your personal data, you have the right to request restriction of the processing pending our verification of whether we may continue to process it, in accordance with the below (see Right to restrict processing).

If, upon your objection, we no longer have a right to process your personal data, you have a right to have the personal data erased in accordance with the below (see Right to erasure).

11 How you can contact us and use your rights

You can contact us regarding all questions concerning protection of your personal data in our data processing activities. You can find our contact information in Section 2 of this Privacy Notice.

You can exercise your rights, free of charge, by contacting us. We will answer your request within one (1) month of receipt of your request, unless there are justified causes to extend this time by two (2) further months. If we cannot fulfil your request, e.g. due to legal obligations, we will inform you in writing within the same time stated above and provide you with the reasons due to which we are unable to fulfil your request. In this case, you can always lodge a complaint with the supervisory authority, if you disagree with our decision.

You can also delete your personal data yourself through your candidate profile by using the “Delete my data” functionality. Once such a request has been submitted, your personal data will be deleted within thirty (30) days.

12 Changes to Privacy Notice

Huhtamaki may amend this Privacy Notice from time to time. While we will aspire to inform you of any significant changes to this Privacy Notice, you are encouraged to regularly visit our website and review the notice for updates.

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