

## Privacy Statement – DIGIA HUB Processing of Subcontractor Information

Digia Hub is an online community facilitated by Digia Finland Oy, a subsidiary of Digia Plc (collectively "Digia") ("Digia Hub"). The primary target of the Digia Hub is for Digia to collect and hold information of its current and potential subcontractors to ensure smooth and straightforward co-operation when Digia needs additional resources or expertise for its customer projects.

### 1. Controller's Contact Information

Contact person for inquiries regarding the processing of personal data described in this privacy statement:

digiahub(at)digia.com

### 2. Data Protection Officer's Contact Information

Data Protection Officer Digia Plc

dpo(at)digia.com

### 3. Purposes of Processing and Legal Bases

Processing Purpose	Legal Basis for Processing
A) Collection of prospect subcontractor data in the DIGIA HUB system	Legitimate interest: conducting business operations
B) Transmission of prospect subcontractor CV data to client organizations	Legitimate interest: conducting business operations
C) Development of DIGIA HUB system's functionality and features	Legitimate interest: business development
D) Registering subcontractor commitment to Digia's Code of Conduct	Legitimate interest: fulfillment of Digia's ESG responsibilities
E) Subcontractor Liability Act required documentation (e.g. Trade register extract)	Legal obligation: assurance of subcontractor compliance with the contractor's liability act.
F) Management of subcontractor contract renewals	Legitimate interest: subcontractor Management

G) Collection of feedback at regular intervals regarding the subcontractor from the customer and Digia representatives	Legitimate interest: quality management system requirement (ISO9001)
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#### 4. Categories of Data Subjects

Freelance entrepreneurs and employees of subcontractor companies

#### 5. Processed Personal Data

Digia processes the following personal data in connection with the above listed processing purposes:

- CV information
- Subcontractor company information
- Contact details
- Usernames and passwords
- Log data of Digia HUB system usage
- Hour reporting
- End date of subcontractor's contract
- Trade register extract
- Acceptance of Digia's Supplier Code of Conduct
- Subcontractor overall performance rating
- Possible free text feedback

#### 6. Data Retention Periods

If there has been no activity for 10 years, the data will be deleted, or earlier upon request. Feedback on the subcontractor will be deleted after 5 years.

#### 7. Regular Data Sources

The data is primarily collected directly from the data subjects themselves when they register to DIGIA HUB and log in to Digia HUB to change their information.

Feedback is collected from customers and Digia contact persons.

#### 8. Recipients

**Subcontractors (frame agreement signed) and potential subcontractors**

DIGIA HUB system (Microsoft Azure data center, North Europe).

**Subcontractors (frame agreement signed)**

Workday Inc: Subcontractor master data management. Data storage within EU/EEA area.

M-Files Oy: Contract archive. Data storage within EU/EEA area.

BaswareP2P: Invoice management. Data storage within EU/EEA area.

Microsoft OneDrive: Offer management. Data storage within EU/EEA area..

**9. Regular Disclosures of Data and Transfers of Data Outside the EU or the European Economic Area**

Digia processes and stores personal data described in this privacy notice primarily within the EU and EEA. However, some of the suppliers used by Digia for its systems or services may be located, operate, or store data outside the EU and EEA in countries where the level of data protection may not be deemed adequate by a decision of the European Commission. In relation to the processing described in this notice, Digia uses the following suppliers operating outside the EU or EEA:

Workday Inc: Subcontractor master data management. Support requests can be handled outside of EU from New Zealand and from the United States.

Separate assessments are carried out for all data transfers before their implementation. Digia complies with the applicable national and international regulations regarding the transfer of personal data. This means, among other things, that necessary contractual safeguards are implemented for the protection of transfers, typically by using European Commission's standard contractual clauses or other equivalent transfer safeguard mechanisms.

**10. Description of Technical and Organizational Security Measures**

Digia has implemented appropriate technical and organizational security measures required by law to protect the personal data it processes from unauthorized access,

processing, loss, alteration, and other security risks. User data is stored in the controller's system, which is protected by operating system security software and functions. Access to the system requires a user-specific identifier. The system is also protected by firewalls and other technical means. Only certain pre-defined employees of the controller and their invited communication counterparts have access to and are authorized to use the data stored in the system. The information in the register is located in locked and guarded premises.

## **11. Rights of Data Subjects**

Applicable legislation guarantees several rights to data subjects regarding their processed personal data. Digia respects these rights and is committed to implementing them. The rights of data subjects are listed below:

- i. The right to request access to personal data concerning the data subject and the right to receive a copy of such data;
- ii. The right to data portability when processing is based on consent and is carried out by automated means;
- iii. The right to request correction, completion, or erasure of inaccurate, incomplete, or outdated personal data processed about the data subject;
- iv. Data subjects have the right to request the restriction of processing in certain situations, for example, if the company no longer needs the data but the data subject does not want it to be erased and instead requests the restriction of processing.
- v. Data subjects have the right to object to the processing of their personal data in certain situations based on their particular circumstances, for example, when the processing is based on the legitimate interests of the data controller and there are no overriding legitimate grounds for the processing.
- vi. Data subjects have the right to have the data controller erase their personal data under certain conditions (the "right to be forgotten"), for example, when the personal data is no longer necessary for the purposes for which it was collected, or when the processing is based on consent and the consent has been withdrawn.
- vii. Data subjects have the right to withdraw their consent to the processing at any time.

viii. Data subjects have the right to lodge a complaint with the competent supervisory authority, which in Finland is the Office of the Data Protection Ombudsman (see tietosuoja.fi).

Requests regarding the exercise of these rights should be sent to the address PrivacyQuery(at)digia.com. Please note that the exercise of certain rights may be subject to additional requirements under applicable law. Additionally, the company may need to request some additional information in order to verify the identity of the requester.

Please include the following information in your request:

- Information that allows your identification (such as full name, email address, or equivalent)
- Information about the role in which you are contacting us (employee/customer/partner)
- Information of the specific data subject right(s) you wish to exercise.