

## AKTSIASELTS INFORTAR

### Privacy Notice for Employees and Candidates

Valid from 11.11.2025

#### INTRODUCTION

This privacy notice document (hereinafter the “**Privacy Notice**”) describes how **AKTSIASELTS INFORTAR** (registry code 1013914) and the companies belonging to its group process personal data in connection with employment relationships, including the personal data of employees and job applicants.

The purpose of this Privacy Notice is to provide our employees and job applicants with clear and transparent information on how we or the companies belonging to our group may process your personal data when you work for us, have worked for us or apply to work for us. This Privacy Notice applies to all Estonian companies belonging to our group.

Please read this Privacy Notice carefully and, if you have any questions regarding how we process your personal data or if you wish to submit a request for the exercise of your rights related to the processing of your personal data, please contact us using the contact details set out in Annex 1 to this Privacy Notice. Not all of the processing activities described in this Privacy Notice necessarily apply to you in every case.

We may amend this Privacy Notice from time to time as necessary. The Privacy Notice is approved and amended by the Management Board of Aktsiaselts Infortar. The contact details set out in Annex 1 to the Privacy Notice are updated as necessary and do not need to be approved by a resolution of the Management Board. The up-to-date Privacy Notice is published on our website.

#### 1. DEFINITIONS

<b>“GDPR”</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
<b>“Infortar”</b>	AKTSIASELTS INFORTAR (registry code 10139414, address Liivalaia tn 9, 10118 Tallinn, Estonia) or any company belonging to the Infortar Group, including a subsidiary or an associated company of Infortar, which processes personal data in a particular case.
<b>“Infortar Group”</b>	All companies belonging to the Infortar group, including Infortar’s subsidiaries and associated companies.
<b>“Personal Data”</b>	Any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to

	an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
<b>“Applicable Law”</b>	All applicable legal acts of the European Union and all applicable legal acts of the Republic of Estonia, including, but not limited to, the national implementing acts of the GDPR which are in force during the validity of this Privacy Notice or will enter into force after the adoption of this Privacy Notice.
<b>“Employer”</b>	Infortar or a company of the Infortar Group with whom the employee has concluded an employment contract or another similar type of contract.
<b>“Employee” või “data subject”</b>	A natural person whose data is processed by Infortar or a company of the Infortar Group in employment relationships or similar contractual relationships.
<b>“Processing”</b>	Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
<b>“Controller”</b>	A natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data. For the purposes of this Privacy Notice, the controller of the employee’s Personal Data is Infortar, which is the employee’s employer or the entity to which the employee applies for a job.
<b>“Processor”</b>	A natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

## 2. GENERAL PROVISIONS

- 2.1. This Privacy Notice applies if you have concluded an employment contract or another similar type of contract (hereinafter the **“Employment Contract”**) with a company of the Infortar Group or if you intend to conclude an employment contract with a company of the Infortar Group. In connection with the conclusion and performance of the Employment Contract as well as the assessment of the suitability of a candidate during the recruitment process, we need to process your Personal Data.
- 2.2. Here and below, the term “Infortar” denotes the company of the Infortar Group which processes Personal Data in a particular case and which is the Controller of the Personal Data, i.e. as a rule the company of the Infortar Group with whom you have concluded an employment contract or another contractual relationship under the law of obligations.

2.3. Infortar ensures that the Processing of employees' Personal Data is carried out in accordance with Applicable Law. The most important legal acts that Infortar relies on when processing employees' Personal Data are the Employment Contracts Act, the Personal Data Protection Act and the GDPR.

### **3. WHEN AND FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA?**

3.1. Infortar processes employees' Personal Data only for specific purposes and on the basis of Applicable Law.

3.2. Infortar processes employees' Personal Data primarily to the extent necessary for the conclusion and performance of the employment contract and where necessary for the performance of obligations arising for Infortar as an employer from Applicable Law.

3.3. The legal basis for the processing of Personal Data in connection with the conclusion and performance of the employment contract is Article 6(1)(b) of the GDPR. The Personal Data that we process in connection with the conclusion and performance of the employment contract are primarily the following:

- 3.3.1. first name and surname;
- 3.3.2. personal identification code;
- 3.3.3. user ID or number in Infortar's systems (including intranet and for the access card);
- 3.3.4. contact details (address, telephone number, e-mail address);
- 3.3.5. if necessary, details of an identity document (including photograph) and residence permit;
- 3.3.6. if necessary, a document certifying the right to drive;
- 3.3.7. bank account details;
- 3.3.8. documents certifying education and/or professional qualification;
- 3.3.9. documents certifying additional training completed;
- 3.3.10. other data provided by the employee when applying for a job;
- 3.3.11. work-related e-mail address and telephone number;
- 3.3.12. job title;
- 3.3.13. remuneration data;
- 3.3.14. data relating to the use of leave;
- 3.3.15. clothing and shoe size for the provision of workwear;
- 3.3.16. data relating to sick leave and occupational accidents;
- 3.3.17. if necessary, data relating to possible offences;
- 3.3.18. if necessary, contact details of a close person (including minor children).

3.4. For the purpose of concluding and performing the Employment Contract, Infortar may process employees' Personal Data for the following specific purposes:

- 3.4.1. organisation of work and assignment of work tasks;
- 3.4.2. calculation and payment of remuneration and other benefits;
- 3.4.3. enabling access to systems necessary for the performance of work tasks;
- 3.4.4. organising additional training and maintaining training records;
- 3.4.5. Processing of the employee's health data in the cases and to the extent provided for in the Occupational Health and Safety Act in relation to the results of health checks and occupational accidents.

3.5. On the basis of the employee's voluntary and clearly specified consent, Infortar may also process the employee's Personal Data for other purposes. The legal basis for the Processing of Personal Data on the basis of consent is Article 6(1)(a) of the GDPR. Infortar will request the employee's consent separately for each case of Processing. The employee has the right to withdraw consent at any time and Infortar will immediately cease the Processing of Personal Data that is carried out on the basis of such consent.

3.6. In certain cases, Infortar may process employees' data on the basis of legitimate interest, in which case the legal basis for the Processing of Personal Data is Article 6(1)(f) of the GDPR. On the basis of Infortar's legitimate interest we also use security cameras (see the chapter on the use of security cameras for more details).

#### **4. PROCESSING OF CANDIDATES' PERSONAL DATA**

- 4.1. Infortar processes the Personal Data of job applicants in the framework of a recruitment process for the purpose of assessing the applicant's suitability for a vacant position offered by Infortar. In connection with applying for a job, Infortar processes the data disclosed by the applicant about themselves in their CV and/or cover letter (including contact details, a description of the applicant, hobbies and information about existing employment relationships). The data of the selected candidate will be used by Infortar in part for the conclusion of the employment contract, requesting additional data where necessary.
- 4.2. The applicant has the right to know which data Infortar has collected about them, to access such data, to provide clarifications in respect of such data and to raise objections. The applicant also has other data subject rights referred to in this Privacy Notice and provided for in Applicable Law.
- 4.3. Infortar deletes and destroys the Personal Data of unsuccessful candidates within 1 year after the recruitment decision has been made.

#### **5. MONITORING ACTIVITIES OF INFORTAR**

- 5.1. Under Applicable Law, Infortar has the right to use surveillance equipment for the purpose of protecting individuals and property. For this purpose, certain companies of the Infortar Group use security cameras on their premises and, in some company vehicles of the Infortar Group, location tracking devices (GPS devices) are being used, in connection with which we also process Personal Data.

- 5.2. The use of security cameras is primarily necessary to ensure security on Infortar's premises (for example in car parks and outdoor areas), to prevent and investigate security incidents and to protect Infortar's property and the safety of people, including employees. Security cameras record only images (no sound is recorded) and are used in common areas on the premises of companies of the Infortar Group. The purpose of using the cameras is to monitor activities on Infortar's premises.
- 5.3. Security cameras are never installed in areas where Infortar's employees or other persons who may be captured by the security cameras may expect full privacy. For example, cameras are never installed in changing rooms, toilets, etc. Where security cameras are used, a sign indicating the use of a camera, i.e. a sign with a camera symbol and/or the word "VIDEO SURVEILLANCE" is always placed in the surveillance area of the security camera. Cameras are not used where such a sign is missing.
- 5.4. The use of GPS devices may be necessary for the performance of statutory obligations (including compliance with tax laws and, consequently, the keeping of a logbook), for the protection of Infortar's property and people (i.e. for the detection of offences) and/or for the prevention and investigation of potential incidents involving company vehicles.
- 5.5. The legal basis for the use of security cameras and GPS devices is Infortar's legitimate interest within the meaning of Article 6(1)(f) of the GDPR.
- 5.6. As a rule, Infortar does not transmit security camera recordings or GPS data to third parties, except where Infortar is authorized or obliged to do so under Applicable Law. For example, Infortar may transmit recordings to public authorities on the basis of Applicable Law where this is necessary for the investigation of offences or other incidents committed during the same period by persons authorized under Applicable Law, such as the Police and Border Guard Board.
- 5.7. Access to security camera recordings and GPS data is restricted to those persons who need such access strictly for the performance of their work duties. For example, this includes employees of Infortar (including members of the Management Board) and Processors.
- 5.8. Infortar applies reasonable organizational and technical security measures in storing security camera recordings and GPS data in order to protect Personal Data against accidental or unauthorized Processing or disclosure. Security camera recordings are stored in a local server room and GPS device data is stored on the servers of the service provider (in a local server and/or a cloud server). Security camera recordings and GPS data are not transferred outside the European Union. Security camera recordings are stored only in the case of those companies of the Infortar Group where the cameras are recording.
- 5.9. Infortar retains security camera recordings and GPS data for up to 2 months from the making of the recording or from the storage of the data, unless:
  - 5.9.1. during this period proceedings have been initiated for the investigation of an offence or other incident committed during the same period and for which it is necessary to retain a specific recording for a longer storage period;

5.9.2. a longer storage obligation for security camera recordings and GPS data arises from requirements set out in legislation or international standards (for example international ISO requirements).

5.10. All employees of Infortar or other third parties who have been present on Infortar's premises and whose image has been recorded by Infortar have the right to access the recording containing their image. It is not possible for Infortar to provide an employee or a third party with a security camera recording if the recording has been deleted by the time the request to access the recording is received. If you wish to view a recording containing your image, if you wish to obtain a copy of a recording or if you have any questions regarding Infortar's Personal Data Processing practices, including specific questions regarding the use of security cameras, please contact your HR contact person or your direct manager.

## **6. TRANSFER OF PERSONAL DATA AND USE OF PROCESSORS**

6.1. Infortar does not transfer employee's Personal Data to third parties, except where it has a lawful right to do so under Applicable Law. Infortar does not transfer employee's data to third parties without a legal basis even after the termination of the employment relationship.

6.2. Employees' Personal Data may be transferred to, or accessed by, Infortar's clients and business partners where this is necessary in connection with the performance of the employee's work tasks.

6.3. Infortar transfers employee data to public authorities to whom Infortar is obliged to transfer data under Applicable Law (for example the Tax and Customs Board, the Health Insurance Fund, etc.).

6.4. Infortar may use Processors in the Processing of Personal Data or share Personal Data between companies of the Infortar Group for internal administrative purposes. Infortar's Processors who may in limited cases process employees' Personal Data include, for example, providers of IT services (server service providers, IT software developers), providers of training services or other providers of support services. Infortar uses as Processors only such cooperation partners whose reliability has been verified by Infortar and who have undertaken to process Personal Data in accordance with Applicable Law.

## **7. RETENTION OF PERSONAL DATA**

7.1. Infortar does not retain Personal Data for longer than is necessary for the purpose of the Processing of Personal Data or as required under Applicable Law. Personal Data, the retention of which is no longer reasonably necessary for the purpose of the Processing or mandatory under Applicable Law will be deleted and destroyed without undue delay.

7.2. In accordance with Applicable Law, Infortar follows the following retention periods for documents containing employees' Personal Data:

7.2.1. Employment contracts concluded before 1 July 2009 are retained for 50 years after termination of the employment contract;

- 7.2.2. employment contracts concluded as of 1 July 2009 are retained for the duration of their validity and for 10 years after termination of the employment contract;
- 7.2.3. source documents for accounting are retained for 7 years;
- 7.2.4. source documents for payroll accounting are retained for 10 years;
- 7.2.5. decisions of health checks are retained for 10 years after termination of the employment contract;
- 7.2.6. data from the investigation of occupational accidents and occupational diseases are retained for 55 years;
- 7.2.7. other documents containing Personal Data are retained for 1 year after termination of the employment relationship.

7.3. The retention period applied to the Processing of candidates' Personal Data is up to 12 months after a negative recruitment decision has been made.

7.4. If you wish to obtain more detailed information on the retention periods of Personal Data, please contact us using the contact details set out in Annex 1 to the Privacy Notice or contact your direct manager.

## **8. RIGHTS OF THE DATA SUBJECT**

8.1. Infortar ensures that candidates and employees are granted all rights of the data subject arising from Applicable Law.

8.2. Every data subject has, among others, the following rights:

- 8.2.1. right of access: the right to request at any time whether Infortar processes Personal Data concerning them and to obtain information on which Personal Data Infortar processes regarding them;
- 8.2.2. right to rectification: the right to request Infortar to rectify or complete their Personal Data if they are insufficient, incomplete or inaccurate;
- 8.2.3. right to object: the right to object to the Processing of their Personal Data by Infortar, for example where the use of Personal Data is based on Infortar's legitimate interest;
- 8.2.4. right to erasure ("right to be forgotten"): the right to request the erasure of Personal Data, for example where Personal Data are processed on the basis of the data subject's consent and the data subject has withdrawn their consent;
- 8.2.5. right to restriction of Processing: the right to request that Infortar restrict the Processing of the employee's Personal Data on the basis of Applicable Law, for example where Infortar no longer needs the Personal Data for the achievement of the purposes of the Processing or where the employee has objected to the Processing of Personal Data;
- 8.2.6. right to withdraw consent to the Processing of Personal Data: where the Processing of Personal Data is based on the data subject's consent, the data subject has the right at any time to withdraw the consent given to Infortar;
- 8.2.7. right to data portability: the employee has the right to receive from Infortar the Personal Data which the employee has provided to Infortar and which are processed on the

basis of the data subject's consent or for the performance of a contract concluded with the data subject, in writing or in a commonly used electronic format, and, where technically feasible, to request Infortar to transmit such data to another controller;

8.2.8. right to lodge a complaint: if the employee considers that the Processing of their Personal Data has infringed their rights, they always have the right to lodge a complaint with the Estonian Data Protection Inspectorate – Tatari 39, 10134 Tallinn, info@aki.ee, <https://www.aki.ee/en>.

8.3. The rights of the data subject listed in this section in relation to the Processing of their Personal Data are not absolute rights. In certain cases, the rights of other data subjects or the legal obligations of Infortar may limit the data subject's rights.

8.4. To exercise the rights associated with the Processing of Personal Data or to submit requests related to the Processing of Personal Data, please contact us using the contact details set out in Annex 1 to this Privacy Notice or contact your direct manager or your HR contact person.

## **9. SECURITY OF PERSONAL DATA**

9.1. Infortar undertakes to ensure the security of the Processing of Personal Data in order to protect Personal Data against accidental or unauthorised Processing, disclosure or destruction.

9.2. Taking into account the latest developments in science and technology, the costs of implementation, and the nature, scope, context and purposes of Processing, as well as the risks of varying likelihood and severity to the rights and freedoms of data subjects arising from such processing, Infortar implements appropriate technical and organisational measures to ensure the security of Personal Data.

9.3. Documents containing employees' Personal Data are stored in such a way that access to them is granted only to a limited number of persons to the extent justified and necessary for the performance of their work duties.

## **10. CONTACT**

10.1. If you have any questions regarding the Processing of Personal Data, including the list of Processors and the purposes of their Processing, or if you wish to submit requests related to the Processing of Personal Data, please contact Infortar by phone, e-mail or post, or contact your direct manager.

## CONTACT DETAILS

Contact details of Aktsiaselts Infortar: Kitty Nõvandi  
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