

# PRIVACY NOTICE

Svartvik Group Oy

Last updated: 7. September 2026

## 1. Data Controller

**Svartvik Group Oy**

Business ID: 3638572-3

Address: Punavuorenkatu 19 A 3, 00150 Helsinki, Finland

Phone: +358 50 553 2524

Website: svartvik.fi

## 2. Data Protection Contact

Valtteri Kautto, CEO

[valtteri.kautto@svartvik.fi](mailto:valtteri.kautto@svartvik.fi)

Phone: +358 50 553 2524

## 3. Overview

Svartvik Group Oy ("Svartvik", "we") provides staffing, recruitment, and consulting services for technical professionals (e.g. construction, infrastructure, energy, and data centre projects) across the Nordics. This Privacy Notice explains how we process personal data of the following groups of data subjects:

- Candidates and consultants (individuals who apply, or could be matched, to assignments through Svartvik)
- Client company contacts (individuals representing Svartvik's current or prospective client, subcontracting, or partner companies)
- Website visitors and marketing contacts (individuals who contact us via svartvik.fi or subscribe to our newsletter)

The processing bases and practices below vary slightly between these groups.

## 4. Candidate and Consultant Register

### 4.1 Purpose of Processing

We process personal data of candidates and consultants in order to:

- assess and map suitability for open or upcoming assignments
- prepare anonymised consultant profiles (CVs) for presentation to client companies
- run the recruitment and staffing process (including interviews and reference checks)
- administer the employment relationship in cases where Svartvik acts as the consultant's employer (staffing/agency work)

- comply with legal obligations (e.g. bookkeeping, tax, and Finnish Act on the Contractor's Obligations and Liability)

## 4.2 Legal Basis

Svartvik operates under two business models with different legal bases:

- Staffing (Svartvik acts as employer): processing is based on the employment contract and the measures it requires, as well as compliance with legal obligations.
- Recruitment / executive search (the client hires the consultant directly): processing is based on our legitimate interest in identifying and presenting suitable candidates to clients, and on steps taken prior to a possible contract.
- Storing an open profile/application for future assignments is based on your consent.

## 4.3 Categories of Personal Data

- Basic information: name, date of birth, contact details, nationality/right to work
- Education, qualifications, and work experience (incl. technical certifications, safety cards, language skills)
- CV and application materials, and anonymised consultant profiles prepared from them
- Salary, tax, and other employment-related data (applies only to staffing assignments where Svartvik is the employer)
- Other information you provide (e.g. salary expectations, availability, references)

## 4.4 Sources of Data

- The data subject themselves (application, conversations, profile information)
- Public and professional sources such as LinkedIn
- Reference persons (with the data subject's consent)

## 4.5 Systems Used

- Customer relations data management system
- Consult and recruiting data management system and candidate sourcing systems
- Graphical systems
- Document storage
- Payroll system
- Generative AI systems

## 4.6 Retention Period

We retain candidate and consultant data for as long as it remains relevant for identifying suitable assignments, and until you ask us to delete it. We recommend keeping your profile up to date; we may periodically contact you to confirm you wish to remain in our register. Employment-related data is retained for the statutory periods required after the employment relationship ends (e.g. under Finnish accounting law).

# 5. Client Company Contact Register

## 5.1 Purpose and Legal Basis

We process personal data of contacts at client, subcontracting, and partner companies to manage customer relationships, handle offers and assignments, and carry out B2B sales and marketing. Processing is based on our legitimate interest in conducting our business and managing our customer relationships, and where applicable, on a contract.

## 5.2 Categories of Personal Data

- Name, job title, employer company
- Work email and phone number
- Communication history and notes related to assignments

## 5.3 Sources of Data

- The contact person themselves (communications, meetings, business cards)
- Public sources such as the company website and LinkedIn

## 5.4 Systems Used

- Pipedrive – customer CRM
- Google Drive – document storage

## 5.5 Retention Period

Contact data is retained for as long as the customer or partner relationship is active or relevant, and for a reasonable period afterwards in case cooperation resumes. Data is deleted or updated on request.

# 6. Marketing and Website Contact Register

## 6.1 Purpose and Legal Basis

When you contact us through our website (svartvik.fi) or subscribe to our newsletter, we process the contact details you provide in order to respond to your enquiry and, where you have given consent, to send marketing communications. Processing is based on your consent (marketing) or our legitimate interest in responding to your enquiry.

## 6.2 Categories of Personal Data

- Name and email address (contact/subscription form)
- Technical data related to website use (e.g. IP address, cookies), where analytics is used on the site

## 6.3 Consent and Withdrawal

Newsletter subscription requires separate, explicit consent (e.g. an opt-in checkbox on the form). You can withdraw your consent at any time using the unsubscribe link included in our messages or by contacting us.

## 6.4 Retention Period

Marketing contact data is retained for as long as your consent remains valid, until you withdraw consent or request deletion.

## 7. Disclosures and Transfers of Personal Data

We do not sell personal data to third parties. Data may be disclosed:

- to client companies where necessary to fulfil an assignment (e.g. a consultant profile or ongoing assignment administration)
- to the service providers (processors) listed in sections 4.5 and 5.4, with whom data processing agreements compliant with the GDPR are in place
- to authorities where required by law

In cases when Svartvik's service provider processes data outside EU/ETA, we ensure an adequate level of data protection through the European Commission's standard contractual clauses or other safeguards required by applicable law.

## 8. Automated Decision-Making

Svartvik does not carry out automated decision-making or profiling that produces legal or similarly significant effects on data subjects.

## 9. Data Security

We protect personal data through appropriate technical and organisational measures, including:

- restricting access rights based on job responsibilities
- password protection and user-specific credentials in the systems we use
- contractual security obligations for our service providers

## 10. Your Rights as a Data Subject

You have the right to:

- access your personal data
- request correction of inaccurate data
- request erasure of your data
- object to processing or request its restriction
- data portability (where applicable)
- withdraw your consent at any time
- lodge a complaint with the Office of the Data Protection Ombudsman (tietosuoja.fi)

Requests can be sent to the contact details in section 2. We aim to respond within one month.

## 11. Updates to This Notice

This Privacy Notice may be updated as our operations or applicable law change. The latest version is available at [svartvik.fi](https://svartvik.fi) or on request from the contact person listed in section 2.