

Recruitment and Junior Talent Privacy Policy of the Eesti Energia group

People are our greatest asset.

Eesti Energia aims to be a reliable partner and to keep the data entrusted to us protected.

The purpose of the privacy policy is to protect the personal data and privacy of data subjects in accordance with European Union legislation and local data protection legislation (in countries where they are active) (such as Regulation (EU) 2016/679 of the European Parliament and of the Council – the General Data Protection Regulation (GDPR)).

The Eesti Energia Group's (hereinafter: Eesti Energia) Recruitment and Junior Talent Privacy Policy (hereinafter: the policy) explains what personal data is processed for the purposes of recruitment and junior talent activities and the purposes, timelines, and legal bases for such activities.

Eesti Energia means Eesti Energia AS and its subsidiaries in which Eesti Energia AS directly or indirectly has a controlling influence. In the sense of the applicable data protection laws, the data controller is Eesti Energia AS or its subsidiary which holds the position or junior talent activity that was applied for. A subsidiary is considered to be a legal person or a branch belonging to Eesti Energia Group that has its registered seat in Estonia, Latvia, Lithuania or Poland. A list of the subsidiaries is available on the [website](#).

1. Definitions

- 1.1. **Data subject** – a natural person about whom Eesti Energia has data that can be used to identify the person. A data subject is a candidate and a reference provider.
- 1.2. **Candidate** – a natural person who submits their application documents for participation in an Eesti Energia recruitment competition and/or junior talent activity, or indicates their interest in applying for in any other way, including possible job offers, without applying for a specific position.
- 1.3. **Reference provider** – a natural person whose data the candidate has provided to Eesti Energia to participate in the recruitment competition and/or the junior talent activity (name and contact details).
- 1.4. **Junior talent activities** – activities that are aimed at persons acquiring formal education with the aim of introducing Eesti Energia's business activities and starting cooperation. Junior talent activities include: mentoring, internships, scholarships, work placements, participation in excursions and events, newsletters and other support activities.
- 1.5. **Personal data** – any information relating to a data subject identified or to be identified, regardless of the form or format of the data.
- 1.6. **Processing of personal data** – any operation performed on the personal data of a data subject, including collection, recording, organisation, storage, alteration, providing access to, consultation and retrieval, use, disclosure, cross-referencing, interconnection, blocking, erasure or destruction of personal data, or several of the said operations, regardless of the way and means by which the operations are carried out.
- 1.7. **Anonymisation** – anonymizing personal data in such a way that it is no longer possible to identify a specific data subject in any way.
- 1.8. **Data controller** – a natural or legal person who alone and together with others determines the purposes and means of processing personal data. For example, when recruiting for Eesti Energia AS in Estonia, the data controller is Eesti Energia AS.
- 1.9. **Processor** – a person who processes personal data only on behalf of the data controller. The processor may also be a cooperation partner (e.g., a recruitment software provider such as Teamdash / Recruitment Software OÜ, agencies and universities, vocational schools, and basic schools).
- 1.10. **Talent pool** – a set of candidates' data for the creation, storage and retention of which the data subject's consent in a form reproducible in writing has been obtained.'

- 1.11. **Data systems** – Eesti Energia’s data repositories, software and information systems where personal data are being processed.
- 1.12. **Website** – the Eesti Energia Group website www.enefit.com and the websites of all companies belonging to the Group (Estonia: www.enefit.ee, www.elektrilevi.ee; Latvia: www.enefit.lv; Lithuania: www.enefit.lt and Poland: www.enefit.pl), including their subpages containing information about job vacancies, talent development activities and/or application options.
- 1.13. **Agreement** – any contract signed by at least two parties, which may include an employment contract, a contract for services, a mandate agreement, a service agreement, or an internship arrangement.

2. Collection and use of personal data

Eesti Energia collects personal data only for clear, specific and legitimate purposes necessary for the organisation of recruitment and junior talent activities. The provisions of this policy regarding the types of personal data, which are collected apply to all companies belonging to the Group, except for Poland, where the binding provisions of law stipulating types of data, which can be collected in recruitment process prevail over the provisions of this policy.

2.1. We only process personal data obtained:

- directly from the data subject (e.g. when applying for or when expressing an interest in applying, joining the talent pool, participating in fairs or communicating with reference providers);
- from data processors (e.g., recruitment agencies and higher education institutions, vocational schools, and primary schools);
- through target search or referral (the data subject is asked for consent to the processing of their personal data before starting data processing for the purposes listed in Section 3);
- when conducting a background check, as publicly available data from external sources (e.g., public and private registers, social media, and the commercial register).

2.2. We collect personal data that constitutes the following types:

- 2.2.1. **Data enabling identification of a person** – name, gender, residential address, contact telephone number, email address or other contact details, date of birth, photograph, citizenship, identity document details and country of residence. Identity document details, which must be presented upon request, if necessary.
- 2.2.2. **Data on skills and work experience** – CV or social media profile, skills and certificates/licences related to the position, education and training information and/or documents, and work achievements and experience.
- 2.2.3. **Data on the results of internal and external evaluations** – depending on the evaluations carried out for the position, information is collected on habits, preferences, satisfaction aspects, salary expectations, interview ratings/feedback, tests (personality and mental ability) and homework results. In addition, feedback from reference providers and other personal data that the data subject has chosen to share with us during the application process is collected. In the course of the evaluation, additional data may be collected, such as notes, video interview recordings and data from communication devices (eg data contained in messages, emails, pictures, video and/or audio recordings, as well as other conversations and communications).
- 2.2.4. **Background check results** – as a mandatory part of the recruitment process, a background check is always conducted with final candidates based on the legitimate interest of the Eesti Energia (such as queries from public data sources) to assess the candidate’s suitability for the position and alignment with our company values. Background checks are carried out based on legitimate interest, except for criminal background check, where legitimate interest as legal basis applies only in Estonia and Lithuania. In Latvia and Poland criminal background checks are based on legal obligation as legal basis. Furthermore, in addition legal obligations is additional

legal basis in Lithuania for background checks for certain job positions. Background checks may result in sensitive information and information about criminal convictions and offences.

- 2.2.5. **Data concerning reliability** – for example, data about a possible conflict of interest, including data about the candidate's business activities, prevention of money laundering and terrorist financing or financial sanctions or organized crime, as well as data about damage caused to Eesti Energia or third parties.
- 2.2.6. **Data requested when concluding an employment contract** – applicable personal identification number (taxable person registration number, citizenship-related number, personal identification code or, depending on the country, another type of personal identification number), contact person, signature, data necessary for payment of wages (eg bank account data), training documents (proving professional qualifications and competence), if necessary, driver's license number, clothing and shoe sizes and other data necessary for concluding an employment contract in the respective position.
- 2.2.7. **Health data** – personal data related to a person's physical and mental health. We process data on health examination results during the hiring process if required by the position or local law.

3. Purpose of and legal basis for processing personal data

Eesti Energia processes personal data for the purposes of recruitment and succession-related activities for identification, evaluation and selection. Data is processed with the data subject's consent, on the basis of a legitimate interest or the law.

Eesti Energia processes a candidate's personal data:

- 3.1. **To assess the candidate's suitability for a specific position or junior talent activity.** When assessing the suitability of candidates, software containing artificial intelligence (AI) is used as an aid in the preliminary selection of CVs, but AI does not make the final decisions.¹ The reference provider's personal data (eg name, position, contact details or relationship with the candidate) may be processed by Eesti Energia to assess the candidate's suitability for a specific position or for the purpose of junior talent activities. The candidate informs the reference provider that they have given their consent to Eesti Energia to answer questions about the candidate and verifies that the reference provider has agreed to this.
Legal basis for processing personal data – in carrying out these activities, Eesti Energia processes the candidate's personal data based on consent, to take steps prior concluding a contract, to fulfil Eesti Energia's legal obligations and based on legitimate interest (GDPR Articles 6(1)(b), 6(1)(c) and 6(1)(f)).
- 3.2. **For the purpose of informing about future job offers and/or opportunities for junior talent activities**, the data is stored and processed, if the candidate has expressed interest by applying for a specific position through the website or by indicating their interest in another way (e.g., via the general application form on the website or by email), but was not selected during the recruitment process or there was no suitable opportunity available for their profile at that time. In this case, we will process the candidate's personal data in the recruitment software for up to 36 months in order to contact them in case of potential job offers or junior talent activities.
Legal basis for processing personal data – the candidate's consent (GDPR Article 6(1)(a)).
- 3.3. **To assess candidates' satisfaction with the recruitment process and/or junior talent activities**, assessed through recruitment software or a questionnaire sent by email.
Legal basis for processing personal data: Eesti Energia's legitimate interest (GDPR Article 6(1)(f)).

¹ Eesti Energia uses the Teamdash recruitment software. More detailed information about data processing principles and their subprocessors can be found at: <https://www.teamdash.com/privacy-policy/>. In addition, the data processing agreement of Teamdash: [Data processing agreement DPA](#).

- 3.4. **To send newsletters** to inform data subjects about upcoming internship and scholarship campaigns and other junior talent activities. For the purpose of data transmission, the data subject's data will be retained for up to 3 years, during which time news items will be sent on junior talent activities within the Group.
Legal basis for processing personal data – the candidate's consent (GDPR Article 6(1)(a)).
- 3.5. **To conclude a contract with the selected candidate.**
Legal basis for processing personal data: conclusion of contract (GDPR Article 6(1)(b)).
 - 3.5.1. **For signing a Non-Disclosure Agreement (NDA)** with the selected job shadowing participant.
Legal basis for processing personal data: legitimate interest (GDPR Article 6(1)(f)).
- 3.6. **If a candidate arrives for a meeting with representatives of Eesti Energia for recruitment and/or junior talent activities in buildings or territories** owned or used by Eesti Energia, the candidate may be observed by a CCTV system.
Legal basis for processing personal data: legitimate interest (GDPR Article 6(1)(f)).
- 3.7. **To assign a health examination (before conclusion of employment contract)** – the purpose of the health examination is to get confirmation that the person's health condition allows them to do the job they are applying for.
Legal basis for processing personal data: taking measures prior to concluding a contract and processing special categories of personal data to assess the working capacity of the employee (GDPR Articles 6(1)(b) and 9(2)(b)).
- 3.8. **For conducting audits, reviews, and compliance checks** to monitor adherence to company policies and legal requirements.
Legal basis for processing personal data: Compliance with the legal obligation of Eesti Energia (GDPR Article 6 (1) (c)).
- 3.9. **Usage information could be saved in the form of cookies** if the candidate sends us their data via the website. Cookies are stored in the web browser during the use of the service. We use cookies to enhance the user experience on the platform and to collect data about its usage, such as platform usage statistics. This is done to protect, manage and improve the platform. Users can disable the use of cookies at any time by changing their device settings. Disabling cookies may affect the experience of using the platform, for example, some functions may not work in this case.
Legal basis for processing personal data: legitimate interest and/or consent (GDPR Articles 6(1)(a) and 6(1)(f)).

4. Retention of personal data

Personal data is retained digitally and/or in hard copy, and the time it is retained depends on the purpose for which the data has been collected.

- 4.1. The data submitted by the data subject for participation in the recruiting process or junior talent activities is retained until the end of the competition and then archived in accordance with applicable legal requirements (15 months in Estonia, 3 months in Latvia, 3 months in Lithuania and 4 months in Poland).
- 4.2. Upon joining the talent pool and/or subscribing to the newsletter, based on the data subject's consent, personal data will be retained for up to 36 months in order to provide future job offers from Eesti Energia or information about junior talent activities.
- 4.3. If we receive information about the data subject in a way other than from the data subject themselves (for example, through a recommendation from his employee or a targeted search) and the data subject does not give their consent to the processing of personal data within 30 days, the data subject's personal data will be deleted after this period has passed.
- 4.4. The data of scholarship recipients will be retained for up to 7 years.
- 4.5. The data of observation interns will be retained for up to 10 years.

- 4.6. The data of job shadowing participants and participants in junior talent events will be retained for the purpose of collecting feedback for up to 30 days following the job shadowing, event, or excursion. If, as part of a recruitment or junior talent activity, the participant has signed a confirmation to comply with confidentiality obligations, this document will be retained for up to 10 years after the activity has taken place.

If we process personal data processed on the basis of consent, we will retain it until the consent is withdrawn or the retention period expires. After the expiry of the retention period or withdrawal of consent, the personal data of the data subject will be deleted.

5. Provision of information

The submission of a job application is optional.

The data subject is responsible for the correctness, truthfulness, accuracy and timeliness of the data and information provided. Before submitting data, the data subject confirms that they have read the privacy policy and, by submitting the job application, consents to the processing of their personal data.

Depending on the data subject's desired position or junior talent activity, Eesti Energia may ask for additional information (such as a driver's license or readiness to work in shifts) as part of some recruitment processes or junior talent activities.

6. Security of personal data

Eesti Energia ensures the confidentiality of personal data in accordance with data protection legislation and implements the necessary technical and organisational measures to protect data and prevent unauthorised access to data and illegal processing or disclosure, accidental loss, alteration or destruction of data.

For this purpose we apply various organisational security measures and recruitment software that is technologically built according to the requirements and we take care of its continuous improvement.

Personal data is stored securely and is accessible only to a limited number of individuals involved in the recruitment process. The technical service provider, i.e the representative of the recruitment software, has access to the candidate's data only on a case-by-case basis for maintenance or development activities. They have a contractual confidentiality obligation.

7. Rights of the data subject

In order to exercise the data subject's rights, prior identification of the data subject is necessary (submission of a digitally signed application or submission of a request through a digital environment that enables prior reliable identification) in order to exclude unauthorised third parties access to personal data and to verify the person's identity.

- 7.1. The right to receive information about whether Eesti Energia processes their personal data and, if it does, to ask for information about it. In order to access transmitted data and make sure of their correctness and relevance, a request must be submitted to us through the contacts below.
- 7.2. Right to request the rectification of incomplete, insufficient or inaccurate personal data or restrict the processing of your personal data. The right to request the anonymisation or deletion of your personal data, except where the processing is necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, or for the establishment, exercise or defence of legal claims.
- 7.3. The right to object to the processing of personal data if the processing is based on a legitimate interest of Eesti Energia or if the processing is incompatible with the purpose of the processing.
- 7.4. The right to receive personal data provided by the data subject which are processed on the basis of consent or for the performance of a contract, in written or commonly used electronic form and,

where feasible, the right to request the transfer of such data to another service provider (data portability).

7.5. The right to withdraw your job application by notifying us via email at: Estonia: career@enefit.com, career@elektrilevi.ee; Latvia career@enefit.lv; Lithuania career@enefit.lt; Poland career@enefit.pl.

7.6. The right to withdraw your consent to the processing of personal data by notifying us via the contacts below.

To exercise the rights described above, a written request must be submitted to the following email address: Estonia career@enefit.com, career@elektrilevi.ee; Latvia career@enefit.lv; Lithuania career@enefit.lt; Poland career@enefit.pl.

Eesti Energia has the right to reject a data subject's application or request to exercise the data subject's rights if Eesti Energia is no longer able to identify the data subject.

If Eesti Energia does not take action upon the request of the data application, request or objection, Eesti Energia will notify the data subject thereof and describe the reasons for the failure to take action no later than one month after receipt of the data subject's request.

If the data subject considers that the processing of their personal data by Eesti Energia violates the data subject's rights and interests based on applicable law, they have the right to file a complaint regarding the processing of personal data to the local data protection authority:

- **Estonia:** Eesti Andmekaitse Inspektsioon, website www.aki.ee, email info@aki.ee, phone +372 6828712
- **Latvia:** Datu valsts inspekcija: www.dvi.gov.lv, email pasts@dvi.gov.lv, phone +371 67223131
- **Lithuania:** Valstybinė duomenų apsaugos inspekcija: <https://vdai.lrv.lt/lt>, email ada@ada.lt, phone +370 52712804
- **Poland:** Urząd Ochrony Danych Osobowych: <https://uodo.gov.pl>, email kancelaria@uodo.gov.pl, phone +48 22 531 03 00

In case of questions and clarifications related to the processing of personal data, the data subject may contact our data protection officer at privacy@enefit.ee, datu.aizsardziba@enefit.lv, privacy@enefit.lt, rodo@enefit.pl. For questions or clarifications related to personal data processed by Elektrilevi OÜ, the data subject may contact Elektrilevi's data protection officer at andmekaitse@elektrilevi.ee.

8. Final provisions

We will do everything possible to keep the document 'Recruitment and Junior Talent Privacy Policy of the Eesti Energia Group' up to date. Therefore, we may need to update the document from time to time. Therefore, for the sake of clarity, we draw attention to the fact that the most recent and valid version of the document can always be found on our website.

Eesti Energia has the right to unilaterally amend this policy at any time, if it is in accordance with regulatory legislation and by notifying candidates of such amendments on their career pages no later than one month after the amendments take effect.

This privacy policy has been prepared in Estonian and translated into English, Latvian, Lithuanian, Polish and Russian. In the event of any dispute, objection, difference of language or interpretation, the Estonian language version of the privacy policy is legally binding.

This version of the Privacy Policy is effective as of 09 February 2026. We reserve the right to amend and update the Privacy Policy as needed. We keep the Privacy Policy up to date and always accessible on our careers page: [Make your impact on the green journey - Enefit](#)