



1 Controller	Name Elo Mutual Pension Insurance Company
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. work telephone, email address) Phone 020 703 50
2 Data protection officer (contact person) in matters related to the filing system	Name Hanna Saira
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. work telephone) Phone 020 703 50
3 Name of the filing system	Filing systems for questionnaire surveys and raffles
4 Purpose of the processing of personal data	Personal data is processed for the purpose of carrying out a raffle among those responding to a survey and taking part in the raffle. The legal basis for the processing of personal data is the consent of the data subject, "Consent".
5 Data content of the filing system	The categories of data subjects and the data types applicable to data subjects: - Those persons responding to a survey who also take part in the raffle ("Consent") The data types concerning data subjects include the following: - Name - Email address
6 Sources of personal data	Surveys are conducted using the personal data provided by the data subjects themselves.
7 Recipients of personal data and categories of recipients	Elo may disclose personal data when the recipient has the right to receive the information based on legislation.



8 Transfers of data to countries outside the EU or EEA	As a rule, personal data is not transferred to countries outside the EU or EEA. When necessary, personal data may be transferred to a country outside the EU/EEA in accordance with the applicable legislation, whereby Elo will ensure that personal data is appropriately protected.
9 Principles concerning the protection of personal data	<p>A Manual material</p> <p>Manual material is protected by means of guarding, locking and access control.</p> <p>B Electronically processed data</p> <ol style="list-style-type: none">1. Data subjects are identified by their personal user IDs before they gain access to the service and the data in the filing system.2. The access rights of data subjects are limited to the data subject's own data in the filing system.3. Elo's personnel are authorised to access the data in the filing system if the person's work responsibilities include the processing of the data stored in the filing system.4. Elo's personnel are bound by the statutory obligation of confidentiality and they have signed a written non-disclosure agreement.5. Elo can use external service providers for the provision of services, as specified in this privacy statement. The same obligations of confidentiality and non-disclosure that apply to Elo's personnel are also applicable to external service providers.6. Encryption is used to protect data transfers in public networks.7. The availability of the service and the filing system data is ensured and monitored regarding the data, the devices and the IT facilities.8. Access to the IT facilities and devices is limited to those individuals whose work duties include tasks related to the IT facilities and devices.9. The accuracy of the software used in the service is monitored.10. Service use is logged in order to enable service development and the investigation of any errors or misuse.11. Service providers that handle data processing tasks shall comply with the following data protection principles:12. The processing of data is based on contracts and access rights granted and controlled by Elo.13. An identity and access management system is used to identify and authorise users.14. Data connections are protected from external access; data encryption is applied in public networks.15. All devices containing Elo's data are maintained and protected by the relevant service providers or IT operations service provider.



<p>10 Retention period of personal data</p>	<p>Personal data used in the analysis and alignment of data related to events and for the sending of invitations and surveys are retained for three years after the registration for the event.</p> <p>Personal data is retained as described above, unless a longer retention period is stipulated by legislation.</p>
--	---



11 Right to check personal data	<p>Data subjects have the right to obtain confirmation as to whether or not personal data concerning them is being processed. If personal data is being processed, the data subject has the right to obtain a copy of the processed data and any necessary information related to the processing.</p> <p>Requests concerning the checking of data must be submitted in writing or by visiting Elo in person. Requests concerning the checking of data are addressed to the contact person defined in this privacy statement.</p>
12 Right to rectification	<p>Data subjects have the right to demand that incorrect or erroneous data is rectified or completed.</p> <p>Requests concerning the rectification of data must be submitted in writing, either in electronic format or manually. Requests are addressed to the contact person defined in this privacy statement.</p>
13 Right to erasure	<p>Data subjects have the right to have the controller erase data when the data is processed based on Elo's legitimate interest if</p> <ul style="list-style-type: none">- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;- The data subject objects to the processing pursuant to Article 21(1) of the General Data Protection Regulation (on grounds relating to the data subject's particular situation) and there are no legitimate grounds for the processing;- The personal data has been unlawfully processed;- The personal data has to be erased for compliance with a legal obligation in the Union or Member State law to which the controller is subject. <p>Requests concerning the erasure of data must be submitted in writing, either in electronic format or manually. Requests are addressed to the contact person defined in this privacy statement.</p>
14 Right to restriction of processing	<p>Data subjects have the right to have Elo restrict the processing of the data subject's personal data based on Elo's legitimate interest if</p> <ul style="list-style-type: none">- The accuracy of the personal data is contested by the data subject, in which case the processing will be restricted for a period enabling the controller to verify the accuracy of the personal data;- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;- The controller no longer needs the personal data for processing purposes, but it is required by the data subject for the establishment, exercise or defence of legal claims;- The data subject has objected to the processing of personal data pursuant to Article 21(1) (on grounds relating to the data subject's particular situation) pending the verification of whether the legitimate grounds of the controller override those of the data subject. <p>Requests concerning the restriction of processing must be submitted in writing, either in electronic format or manually. Requests are addressed to the contact person defined in this privacy statement.</p>
15 Right to data	<p>Data subjects have the right to demand the transfer of data to another system. Such requests must be submitted in writing, either in electronic format or manually. Requests are addressed to the contact person defined in this privacy statement.</p>



portability	
16 Right to object	<p>Data subjects have the right to object to the processing of personal data on grounds relating to the data subject's particular situation, if the processing is based on a legitimate interest of the controller.</p> <p>After this, the controller has no right to process the data, unless there are compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the data subject.</p> <p>Notifications concerning objection must be submitted in writing, either in electronic format or manually. Requests are addressed to the contact person defined in this privacy statement.</p>
17 Other rights related to the processing of personal data	<p>Data subjects always have the right to lodge a complaint with a supervisory authority if they consider that their personal data has been processed contrary to the provision of the General Data Protection Regulation.</p> <p>Any communication and actions based on requests made by the data subject are primarily provided free of charge, unless the requests are manifestly unfounded, excessive or recurring. Based on this, the controller can also refuse to act on the request, in which case the controller must provide a decision with justifications.</p> <p>Data subjects must submit their requests concerning the exercising of their rights to the data protection officer responsible for the filing system. Such requests can be submitted via encrypted email or by written letter to Elo. The request must include specific information on the data subject's identity, the scope of the request and the actions required to be taken.</p>