



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 Contact person in matters related to the filing system	Name Joni Tikkanen
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. work telephone, email address) Phone +358 20 703 50
3 Name of the filing system	Filing systems for information regarding events and surveys
4 Purpose of processing personal data	<p>The purpose of processing personal data is to manage practical arrangements for events, conducting the surveys related to such events, analysing the collected data and aligning the data with the data in the customer register. The objective is to create the best possible customer experience for Elo's customers. Any information submitted by the customer may be used in direct marketing in accordance with current legislation.</p> <p>The legal basis for the collection of personal data for the purpose of event invitations and the related surveys constitutes a legitimate interest of the controller. Such categories of personal data have been marked with "legitimate interest" in section 5.</p> <p>An additional legal basis for the processing of personal data for the purpose of event invitations and related surveys is the consent of the data subject. Such categories of personal data have been marked with "consent" in section 5.</p>
5 Data content of the filing system	<p>The categories of personal data and data types applicable to data subjects:</p> <ul style="list-style-type: none">- TyEL policyholders (legitimate interest)- YEL policyholders (legitimate interest)- Contact persons at accounting firms (legitimate interest)- Partners (customer service representatives of LähiTapiola, Fennia and Turva) (legitimate interest)- Insurance brokers (legitimate interest)- Potential customers (consent) <p>The data types concerning data subjects include the following:</p>



	<ul style="list-style-type: none"> - Name - Company - Title - Email address - Phone number - Information on attendance to the event - Dietary requests - Survey responses - Possible additional information
<p>6 Sources of personal data</p>	<p>The surveys utilise personal data provided by the data subject themselves. The following information sources are used in the mailing of invitations, the analysis of data and data alignment:</p> <ul style="list-style-type: none"> - Elo's customer information system - Notifications provided by the person or their representative - Suomen Asiakastieto Oy - Fonecta - Posti (postal services)
<p>7 Recipients of personal data and categories of recipients</p>	<p>Elo may use a third party to carry out event organisation, or to send out surveys and invitations on behalf of Elo, in case this is necessary for the successful realisation of the event or survey.</p> <p>Elo discloses personal data to other controllers only with the data subject's consent or in the event that the transferee has the right to receive the information based on legislation.</p>
<p>8 Transfers of personal data to countries outside the EU or EEA</p>	<p>As a rule, personal data is not transferred to countries outside the EU or EEA. Personal data may be transferred to a country outside the EU/EEA, when necessary, in accordance with applicable legislation, whereby Elo will ensure that personal data is appropriately protected.</p>
<p>9 Principles concerning the protection of personal data</p>	<p>A Material that is processed manually</p> <p>Manual material is protected by means of guarding, locking and access control</p> <p>B Data that is processed automatically</p> <ol style="list-style-type: none"> 1. The data subject is identified by means of personal user IDs before they can access 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 representatives 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 representatives are subject to a statutory obligation of secrecy, and they have signed a written non-disclosure agreement. 5. Elo can use external service providers to provide the services, as defined in this privacy statement. The same obligations of secrecy and non-disclosure that apply to Elo's employees also apply to the service providers.



	<p>6. Encryption is used to protect data transfers in public networks.</p> <p>7. The availability of the service and the filing system data is ensured and monitored regarding data, equipment and equipment premises.</p> <p>8. Access to equipment premises and equipment is restricted to persons whose work responsibilities include tasks related to the equipment premises or equipment.</p> <p>9. The accuracy of the software used for the service is monitored.</p> <p>10. Service use is logged in order to enable service development and the investigation of any errors or misuse.</p> <p>11. Regarding the service providers responsible for data processing tasks, the following data protection principles are applied:</p> <ul style="list-style-type: none">- The processing of data is based on contracts or access rights granted and monitored by Elo.- An identity and access management system is used to identify and authorise users.- Data connections are protected from external access; data encryption is applied in public networks.- Elo's equipment on which data is stored is maintained and protected by a service provider or hosting service provider.
10 Retention period of personal data	<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 must be 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 presented in writing, either in electronic format or manually. Requests are addressed to the contact person provided in this privacy statement.</p>
13 Right to erasure	<p>Data subjects have the right to have the controller erase data, when 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; <p>the data subject objects to the processing pursuant to Article 21(1) of the General Data Protection Regulation (on grounds relating to his or her particular situation) and there are no legitimate grounds for the processing;</p> <ul style="list-style-type: none">the personal data has been unlawfully processed;the personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject. <p>Requests concerning the erasure of data must be presented in writing, either in electronic format or manually. Requests must be addressed to the contact person defined in this privacy statement.</p>



<p>14 Right to restriction of processing</p>	<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 his or her 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 presented in writing, either in electronic format or manually. Requests must be addressed to the contact person defined in this privacy statement.</p>
<p>15 Right to data portability</p>	<p>Data subjects have the right to demand data portability. Such requests must be presented in writing, either in electronic format or manually. Requests are addressed to the contact person provided in this privacy statement.</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 must be addressed to the contact person defined in this privacy statement.</p>
<p>16 Right to object</p>	<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. 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. Notifications concerning objections must be submitted in writing, either in electronic format or manually. Requests must be addressed to the contact person defined in this privacy statement.</p>
<p>17 Other rights related to the processing of personal data</p>	<p>Data subjects always have the right to lodge a complaint with a supervisory authority if, in the data subject's opinion, his or her personal data has been processed contrary to the provisions of the General Data Protection Regulation.</p> <p>Any communication and actions taken 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 requests must include specific information on the data subject's identity, the scope of the request and the actions required to be taken.</p>