

Privacy statement

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 Aaro Mutikainen
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. daytime phone number) Phone 020 703 50
3 Name of the filing system	Log management filing system
4 Purpose of and legal basis for the processing of personal data	<p>The purpose of the processing of personal data is:</p> <ul style="list-style-type: none"> • the use and implementation of communication and network services and the protection of related data security • the identification, prevention and submission for pre-trial investigation of any misuse of information systems • resolving error situations • internal billing • operative development
5 Data content of the filing system	<p>The categories of data subjects are:</p> <ul style="list-style-type: none"> • persons using technological systems and services <p>The data types concerning data subjects include the following:</p> <ul style="list-style-type: none"> • information regarding technological systems and services or the object of processing
6 Sources of personal data	Each information system whose log data is being stored.
7 Recipients of personal data and categories of recipients	<p>Elo discloses personal data only with the data subject's consent or in the event that the recipient is entitled to receive the information based on legislation.</p> <p>Elo uses external service providers for information system and personal data may be disclosed to these external service providers. The names of the contracting parties cannot be disclosed due to business-related confidentiality obligations. The service providers are established in Finland.</p>



8 Transfers of personal data to countries outside the EU or EEA	Possible transfers to countries outside the EU or EEA are carried out under the European Commission's approved standard contract clauses, which ensure an adequate level of data protection.
9 Principles concerning the protection of personal data	<p>A Material that is processed manually</p> <p>No material is processed manually.</p> <p>B Data that is processed automatically</p> <ol style="list-style-type: none">1. Users are 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 users are limited to the user's own data in the filing system or data that the user is authorised to access with the data owner's authorisation.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.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 data, equipment and equipment premises.8. Access to equipment premises and equipment is restricted to persons whose work responsibilities include tasks related to the equipment premises or equipment.9. The accuracy of the software used for the service is monitored.10. Service use is logged in order to enable service development and the investigation of any errors or misuse.11. Regarding the service providers responsible for data processing tasks, the following data protection principles are applied:<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	The storage period of log data is the current year and the following five calendar years.
11 Right to check personal data	<p>Data subjects have the right to check their own data stored in the filing system.</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>12 Right to rectification</p>	<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 must be addressed to the contact person defined in this privacy statement.</p>
<p>13 Right to erasure</p>	<p>Data subjects have no right to have data erased if the data is processed in order to fulfil legal obligations.</p> <p>Data subjects have the right to have the controller erase data if 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 his or her 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 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.</p>
<p>14 Right to restriction of processing</p>	<p>If Elo is fulfilling its legal obligations, data subjects have the right to restrict the processing only if 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.</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.</p>
<p>15 Right to data portability</p>	<p>Data subjects have no right to demand data portability when data is processed in order to fulfil legal obligations or based on Elo's legitimate interest.</p>
<p>16 Right to object</p>	<p>Data subjects have no right to object to the processing if the controller is fulfilling its legal obligations.</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</p>



	<p>legitimate grounds for the processing which override the interests, rights and freedoms of the data subject.</p> <p>Notifications concerning objections must be submitted in writing, either in electronic format or manually.</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 contact person 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>