



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 in matters related to the filing system	Name Jouni Seppänen
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. work telephone, email address) Phone 020 703 50
3 Name of the filing system	Filing systems for employment pension insurances and customer relationship management
4 Purpose of and legal basis for the processing of personal data	<p>Personal data is processed in order to manage and develop the responsibilities and services related to employment pension insurance business in accordance with pension legislation, to identify data subjects, to manage contact data and to manage obligations related to storage, reporting and inquiries as well as the related customer service in accordance with legal obligations and orders issued by authorities and the Finnish Centre for Pensions, and for the purpose of activities serving customer relationship management, insurance marketing and the provision of the related customer service. In addition, personal data is used for direct marketing and other equivalent contacting of potential customers as well as for testing related to information system development. Furthermore, personal data is used for incident management related to information systems and for testing related to system development.</p> <p>The legal basis for the collection of personal data collected for the requirements of employment pension insurance and customer relationship management processes is the performance of the controller's legal obligation. The categories of personal data for which the collection of personal data is based on Elo's statutory responsibilities have been marked with "statutory obligation" in the categories of personal data listed in section 5. In addition, the process includes the processing of special categories of personal data, to which the exceptional grounds set out in Article 9 of the General Data Protection Regulation are applied.</p> <p>The second basis for collecting personal data used in the processes of employment pension insurances and customer relationship management is the execution of contracts. Such categories of personal data have been marked with "based on a contract" in section 5.</p> <p>The third basis for collecting personal data used in the processes of employment pension insurances and customer relationship management is Elo's legitimate interest. Such categories of personal data have been marked with "legitimate interest" in section 5.</p>



	<p>Personal data is utilised for automated decision-making concerning YEL insurance applications, if the matter concerns a registered individual applying for the initiation of YEL insurance, a change in YEL income or termination of insurance, and the conditions for the automated decision process are met. Such conditions include, for example, the existing obligation to insure as established on the basis of the application or the required level of the YEL income. Registered individuals have the right of appeal regarding a decision and the right to demand a manual processing of their matter.</p> <p>The requested information must be provided in order for the data subject's employment pension insurance matter to be processed. If the requested personal data is not provided, the employment pension insurance matter cannot be processed and, for example, the employment pension insurance decision cannot be issued.</p>
<p>5 Data content of the filing system</p>	<p>Regarding the processes for employment pension insurances and customer relationship management, personal data is collected for the following categories of personal data:</p> <ul style="list-style-type: none">- Policyholders of TyEL and YEL insurances (legal obligation)- TyEL insured persons (legal obligation)- Personal data related to insurance debt collection (legal obligation)- Personal data related to the processing of an insurance matter (based on a contract)- Personal data related to the clarification of employment (legal obligation)- Persons responsible for the customer relationship at partner organisations (legitimate interest)- Contact persons for the customer relationships (legitimate interest) <p>The data types concerning data subjects include the following:</p> <ul style="list-style-type: none">- Name- Phone number- Email address- Address- Location data- Personal identification number- Nationality- Customer number- Insurance policy number- Business ID- Income data- Earned income- Identification information- Information required for the identification of customers and communication with them- ID of the responsible person- Information on connections with other customers- Insurance contract information- Information on insurance contributions- Information related to the collection of insurance contributions- Information related to the management of customer relationships- Issued decisions concerning the policyholder <p>Several categories of personal data can be collected for data subjects.</p>



<p>6 Sources of personal data</p>	<p>Data sources used:</p> <ul style="list-style-type: none">- Notifications provided by the data subject or his/her representative- Employer- The filing systems of the Finnish Centre for Pensions and Arek (income information system)- Pension institutions- Tax administration- Execution authorities- Insurance companies- Pension Appeal Board- The Insurance Court- Banks- Accounting firms- Suomen Asiakastieto Oy- Fonecta- Posti (postal services)- Population Register Centre- Elo's partners- Data concerning persons is also accumulated in connection with Elo's own operations
<p>7 Regular disclosures of data</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>Elo can disclose data to the following parties based on legislation:</p> <ul style="list-style-type: none">- Joint filing systems of the employment pension sector- Finnish Centre for Pensions- Pension institutions <p>Elo uses external ICT service providers for application development and the maintenance of systems related to employment pension insurances and customer relationship management, and personal data is 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>
<p>8 Transfers of data to countries outside the EU or EEA</p>	<p>Data is not transferred to countries outside the EU or EEA.</p>
<p>9 Principles concerning the protection of personal data</p>	<p><i>A Manual materials</i></p> <p><i>Manual materials are protected by means of on-site security, locks and access control.</i></p> <p><i>B Electronically processed data</i></p> <ol style="list-style-type: none"><i>1. Users are identified by their personal ID codes before they gain access to the service and the recorded data.</i><i>2. Users only have access rights to such recorded data as concerns them personally or to which they have been granted authorisation by the owner.</i><i>3. Users have access rights to recorded data if the processing of the data is necessary for the performance of their work tasks.</i>



	<p>4. <i>Elo's personnel are bound by the statutory obligation of confidentiality and every employee has signed a separate confidentiality agreement.</i></p> <p>5. <i>Elo may utilise external service providers for the provision of its services. The provisions on secrecy and the confidentiality agreements that are applicable to Elo's own personnel are also applicable to external service providers.</i></p> <p>6. <i>Data transfer and network connections are protected against unauthorised access.</i></p> <p>7. <i>The availability of the service and data file is secured and supervised as regards the data, the devices and the IT facilities.</i></p> <p>8. <i>Access to the IT facilities and devices is limited to those individuals whose work duties include tasks related to the IT facilities and devices.</i></p> <p>9. <i>The functionality and accuracy of the software and systems used in the service is ensured and maintained. The use of the services is monitored by means of logs.</i></p> <p>10. <i>Service providers that handle data processing tasks shall comply with the following principles concerning data protection:</i></p> <ul style="list-style-type: none"> - <i>The processing of data is based on agreements and the access rights granted and controlled by Elo.</i> - <i>All devices containing personal data are maintained and protected by the relevant service provider or IT operations service provider.</i>
<p>10 Retention period of personal data</p>	<p>Personal data in the various categories of personal data that has been collected in order to fulfil the above-mentioned legal obligations is retained for ten (10) years after the termination of the relevant contract, as set out for insurance matters in the Employees Pensions Act, or for five (5) years from the death of the data subject, as set out for pension matters in the Employees Pensions Act (section 218).</p> <p>Personal data that is collected based on Elo's legitimate interest is retained in accordance with the Accounting Act for six (6) years after the relevant agreement has terminated (Accounting Act, chapter 2, section 10).</p> <p>Personal data is retained as described above, unless a longer retention period is stipulated by legislation.</p>
<p>11 Right to check per- sonal data</p>	<p>Data subjects have the right to obtain confirmation as to whether or not personal data concerning him or her 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 (Article 15).</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 rec- tification</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 a legal obligation or to execute a contract.</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. Requests must be addressed to the contact person defined in this privacy statement.</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. 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 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 obligation or executing a contract.</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.</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 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 matters related</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>



**to the rights
of data sub-
jects**

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.

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.