



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 Jouni Seppänen
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. work telephone) Phone 020 703 50
3 Name of the filing system	Filing systems of pension processes
4 Purpose of and legal basis for the processing of personal data	<p>Personal data is processed in order to manage and develop the tasks and services related to payment activities in accordance with pension legislation, to identify data subjects, to manage contact data and to manage 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. In addition, personal data is used in order to process the insurance matters of employers who have taken out a TyEL insurance policy through Elo and to provide services to such employers.</p> <p>Furthermore, personal data is processed at Elo in connection with incident management related to information systems, for testing purposes related to system development, for quality assurance and in the planning of operations and services for analytics-related tasks that may include profiling. No decisions will be made based on profiling.</p> <p>Decisions regarding disability pensions may be based on profiling for the purpose of quality assurance. Profiling is based on data relevant to the matter being processed as well as decision statistics with the applicable data categories specified under section 5 obtained from sources specified under section 6 below. Profiling will not be used as a basis of automatically processed decisions.</p> <p>The legal basis for the collection of personal data collected for the requirements of pension processes is the fulfilment of the controller's legal obligations. The categories of personal data for which the collection of personal data is based on Elo's statutory duties have been marked with "statutory obligation" in the categories of personal data listed in section 5.</p> <p>In the pension processes, special categories of personal data, as set out in the General Data Protection Regulation, are also processed in connection with the processing of personal data related to a person's health. Under the data protection legislation, insurance companies have the right to process personal data related to a policyholder's health in connection with the insurer's insurance business.</p>



	<p>An additional legal basis for the processing of personal data used in the pension process 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 old-age or partial old-age pension applications, if the registers can provide such information for the processing of an application and pension calculations as are necessary for the granting of pension from the applied date. 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 pension-related matter to be processed. If the requested personal data is not provided, the pension matter cannot be processed and, for example, the pension decision cannot be issued.</p>
<p>5 Data content of the filing system</p>	<p>Regarding the pension process, personal data is collected for the following categories of personal data:</p> <ul style="list-style-type: none">- Other persons related to the processing of a pension or rehabilitation matter (statutory obligation)- The applicant for a pension or rehabilitation benefit (statutory obligation)- The beneficiary of a pension or rehabilitation benefit (statutory obligation)- Persons receiving benefits based on a payment service agreement (legitimate interest)- Employer's contact persons related to a payment service agreement (legitimate interest)- Persons who have received counselling (statutory obligation) <p>Depending on the category of personal data, the following personal data is collected for the requirements of pension processes:</p> <ul style="list-style-type: none">- Estimated amount of pension- Chat conversations- Information related to the supervision of the interests of another party- Data in the joint pension systems and data related to processing carried out by Kela and other pension institutions- Pension decision data- Pension amount- Personal identification number- IP address- Information on education and profession- Other paid benefits- Name- Educational institution- Address- Information on benefits paid during unsalaried periods- Phone number- Call recordings- Marital status and family relations- Email address- Health data- Account number- Employment history and income data- Recovery proceedings data- Power of Attorney- Tax rate



	Several categories of personal data can be collected for data subjects.
6 Sources of personal data	<p>Data sources used:</p> <ul style="list-style-type: none">- Pension applications or additional information related to them- Pension decisions or additional information related to them- Information provided by tax authorities- Agreements concerning a pension payment service or additional information related to them- Joint filing systems of the employment pension sector- Information provided by an execution authority or additional information related to such information- Notifications provided by the data subject or his/her representative- Employers- Pension institutions- Doctors, hospitals, health centres- Unemployment funds and employment offices- Employment authorities- Population Register Centre- Social welfare authorities- Kela (Social Insurance Institution of Finland)- Insurance companies- Patient Insurance Centre- The party responsible for rail traffic insurance- Pension Appeal Board- The Insurance Court- Banks- Accounting firms- Service providers forwarding contact information- Suomen Asiakastieto Oy- Trade Register- The contact institutions defined in the EU's social security regulation or social security agreement through information forwarded by the Finnish Centre for Pensions
7 Recipients of personal data and cat- egories of re- cipients	<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 can disclose data to the following parties based on legislation:</p> <ul style="list-style-type: none">- Trustee- Employer- Joint filing systems of the employment pension sector (Arek Oy)- Pension institutions- Tax authorities- Unemployment funds and employment offices- Employment authorities- Social welfare authorities- Execution authorities- Kela (Social Insurance Institution of Finland)- Insurance companies processing traffic and occupational accident insurance- Life insurance companies- Patient Insurance Centre- The party responsible for rail traffic insurance- Pension Appeal Board- The Insurance Court



	<ul style="list-style-type: none"> -Banks -Service providers processing rehabilitation-related matters based on Elo's orders -The contact institutions defined in the EU's social security regulation or social security agreement through information forwarded by the Finnish Centre for Pensions <p>Elo uses external ICT service providers for application development and the maintenance of the processing system, online service and pension payment system, 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 and India.</p>
<p>8 Transfers of personal data to countries outside the EU or EEA</p>	<p>Pseudonymised personal data is disclosed to India to the information system suppliers of Elo's pension processes in order to enable the execution of tasks related to incident management and system development.</p> <p>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.</p>
<p>9 Principles concerning the protection of personal data</p>	<p>A Manual materials</p> <p>Manual materials are protected by means of on-site security, locks and access control.</p> <p>B Electronically processed data</p> <ol style="list-style-type: none"> 1. Users are identified by their personal ID codes before they gain access to the service and the recorded data. 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. 3. Users have access rights to recorded data if the processing of the data is necessary for the performance of their work tasks. 4. Elo's personnel are bound by the statutory obligation of confidentiality and every employee has signed a separate confidentiality agreement. 5. 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. 6. Data transfer and network connections are protected against unauthorised access. 7. The availability of the service and data file is secured and supervised as regards 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 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. 10. Service providers that handle data processing tasks shall comply with the following principles concerning data protection: <ul style="list-style-type: none"> - The processing of data is based on agreements and the access rights granted and controlled by Elo. - All devices containing personal data are maintained and protected by the relevant service provider or IT operations service provider.



10 Retention period of personal data	<p>The personal data in the various above-mentioned categories of personal data that is collected for the purpose of fulfilling legal obligations is retained for five (5) years from the death of the data subject, in accordance with the retention period set out 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>
11 Right to check per- sonal data	<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.</p> <p>If data is transferred to a third country, the data subject has the right to be notified of the safeguards that have been applied.</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 must be addressed to the contact person defined in this privacy statement.</p>
13 Right to erasure	<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. Requests must be addressed to the contact person defined in this privacy statement.</p>
14 Right to restriction of processing	<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>
15 Right to data portability	<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>
16 Right to object	<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.</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>
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, 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>