



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 Jari Torppa
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. work telephone) Phone 020 703 50
3 Name of the filing system	The filing system for Elo's phone service
4 Purpose of and legal basis for the processing of personal data	<p>Personal data is processed for the purpose of managing and developing tasks and services related to Elo's phone and chat services (hereinafter "the phone service") and in order to identify data subjects and manage contact data.</p> <p>In addition, personal data is processed at Elo in connection with incident management related to the information system used by Elo's phone service and for testing and quality assurance purposes related to system development.</p> <p>The legal basis for the collection of personal data that is collected for the requirements of Elo's phone service is the legitimate interest of the controller.</p>
5 Data content of the filing system	<p>Regarding Elo's phone service, personal data is collected for the following categories of personal data</p> <ul style="list-style-type: none">- Personal data related to the phone service <p>Of this category of personal data, the following personal data is collected for the requirements of Elo's phone service:</p> <ul style="list-style-type: none">- Call recordings- Phone number- Email address- Recordings of calls- Chat conversations <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"> -Phone and chat conversations -Email messages
<p>7 Recipients of personal data and categories of recipients</p>	<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 an external ICT service provider for application development and the phone system maintenance, and personal data is disclosed to this external service provider. 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 personal data to countries outside the EU or EEA</p>	<p>Personal data is not transferred to countries outside the EU or EEA.</p>
<p>9 Principles concerning the protection of personal data</p>	<p>A Material that is processed manually</p> <p>No material is processed manually.</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>Personal data that is collected on the basis of Elo's legitimate interest is retained for one (1) year from the service event.</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 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>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 based on Elo's legitimate interest.</p>
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 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>