



<b>1 Controller</b>	Name Elo Mutual Pension Insurance Company
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. work telephone, email address) Phone 020 703 50
<b>2 Data protection officer in matters related to the filing system</b>	Name Anu Suutela-Vuorinen
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. work telephone, email address) Phone 020 703 50
<b>3 Name of the filing system</b>	Filing systems of occupational well-being surveys
<b>4 Purpose of and legal basis for the processing of personal data</b>	<p>Personal data is processed for the purpose of conducting surveys that are carried out to support the development of occupational well-being at customer companies (customer organisations). The personal invitations and reminders for the surveys are sent on the basis of respondent data. Surveys are conducted using the personal data provided by employers.</p> <p>The legal basis for processing personal data is the pursuit of the legitimate interests of the controller or a third party. Occupational well-being activities are part of Elo's statutory operations and conducting surveys is part of the operational models in place. Surveys conducted in order to improve occupational well-being are based on an insurance contract that an employer concludes with Elo. When an employer has a TyEL insurance contract, the company can use the survey that is offered as part of Elo's service portfolio for occupational well-being. The company informs its employees of the collection of respondent data.</p>
<b>5 Data content of the filing system</b>	<p>The categories of personal data concerning data subjects include the following:</p> <ul style="list-style-type: none"><li>- Person belonging to the customer organisation</li><li>- Contact person for the customer relationship</li></ul> <p>The data types concerning data subjects include the following:</p> <ul style="list-style-type: none"><li>- Name</li><li>- Phone number</li><li>- Email address</li><li>- Response language (Finnish/Swedish/English)</li><li>- Survey responses</li></ul> <p>Several categories of personal data can be collected for data subjects.</p>



<p><b>6</b> <b>Sources of personal data</b></p>	<p>Data sources used:</p> <ul style="list-style-type: none"> <li>- Customer organisations</li> </ul>
<p><b>7</b> <b>Recipients of personal data and categories of recipients</b></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> <ul style="list-style-type: none"> <li>-The customer organisation (individual respondents cannot be identified from the disclosed data)</li> </ul> <p>Elo uses external ICT service providers for application development and the maintenance of the surveys, 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><b>8</b> <b>Transfers of personal data to countries outside the EU or EEA</b></p>	<p>Personal data is not transferred to countries outside the EU or EEA.</p>
<p><b>9</b> <b>Principles concerning the protection of personal data</b></p>	<p>A Manual materials</p> <p>No material is processed manually.</p> <p>B Electronically processed data</p> <ol style="list-style-type: none"> <li>1. The contact person of the customer organisation (the customer's admin) can view a summary of the respondent's feedback through a secured website.</li> <li>2. The response data is anonymised and cannot be linked to individuals. Pre-defined users at Elo are authorised to access the data in the survey database if the person's work responsibilities include the processing of the data stored in the filing system. Based on the data in the database, response data can be linked to the person who gave the response.</li> <li>3. Users have access rights to recorded data if the processing of the data is necessary for the performance of their work tasks.</li> <li>4. Elo's personnel are bound by the statutory obligation of confidentiality and every employee has signed a separate confidentiality agreement.</li> <li>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.</li> <li>6. Data transfer and network connections are protected against unauthorised access.</li> <li>7. The availability of the service and data file is secured and supervised as regards the data, the devices and the IT facilities.</li> <li>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.</li> <li>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.</li> <li>10. Service providers that handle data processing tasks shall comply with the following principles concerning data protection:</li> </ol> <ul style="list-style-type: none"> <li>- The processing of data is based on agreements and the access rights granted and controlled by Elo.</li> </ul>



	<p>- All devices containing personal data are maintained and protected by the relevant service provider or IT operations service provider.</p>
<p><b>10 Retention period of personal data</b></p>	<p>The collected personal data is retained for three (3) years from the time the occupational well-being survey was conducted.</p> <p>Facilitating the drafting of a new survey in the event of follow-up surveys is the reason for the length of the retention period. This enables the use of previous survey templates and adding new/keeping existing/removing obsolete respondents instead of adding all users once again.</p> <p>Personal data is retained as described above, unless a longer retention period is stipulated by legislation.</p>
<p><b>11 Right to check personal data</b></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.</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><b>12 Right to rectification</b></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><b>13 Right to erasure</b></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"> <li>-The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed</li> <li>- 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</li> <li>-The personal data has been unlawfully processed</li> <li>-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.</li> </ul> <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><b>14 Right to restriction of processing</b></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"> <li>-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</li> <li>-The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead</li> <li>-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</li> </ul>



	<p>-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> <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>
<b>15 Right to data portability</b>	<p>Data subjects have the right to demand data portability.</p> <p>Such requests 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>
<b>16 Right to object</b>	<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>
<b>17 Other matters related to the rights of data subjects</b>	<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>