

## **Privacy Notice – Image and Video Archive Register**

*This privacy notice is an AI-generated translation. The legally valid privacy notice is available in Finnish*

## **Privacy Notice – Image and Video Archive Register**

### **1. Controller and Contact Person**

#### **Controller**

Industrial Union (Teollisuusliitto ry)  
Business ID: 0201717-2

#### **Contact for Data Protection Matters**

Email: tietosuojavastaava@teollisuusliitto.fi  
Tel: +358 20 774 001  
Industrial Union / Data Protection Officer  
P.O. Box 107, FI-00531 Helsinki, Finland

### **2. Categories of Data Subjects**

This register contains personal data of individuals who have participated in the activities of the Industrial Union or who have, upon request, submitted photographs or video material to the Union's image archive.

### **3. Purpose and Legal Basis for Processing**

The register contains photographs and video clips depicting individuals who have taken part in the Union's activities.

The legal bases for processing are:

- **Legitimate interest of the controller** (Article 6(1)(f) GDPR), including documenting and preserving the Union's history and communications, and
- **Consent of the data subject** when processing the contact information of individuals who submit images or videos (Article 6(1)(a) GDPR).

### **4. Personal Data Processed in the Register**

The register may include the following types of personal data:

#### **Images and recordings**

- Photographs
- Video recordings

#### **Information about the person submitting images or videos**

- Name
- Email address

#### **Information about individuals appearing in photos or videos**

- Name

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### 5. Special Categories of Personal Data

The register may include special category data, as trade union membership is considered a special category of personal data under Article 9 GDPR.

### 6. Personal Data Retention Period

- Photographs and videos may be stored **for an indefinite period** and may be transferred to the *Työväen Arkisto* (Labour Archives).
- The names of individuals who submit images may also be retained **indefinitely**.
- Email addresses of submitters are retained for a maximum of **two (2) years** from the time the images were submitted.

### 7. Regular Sources of Information

Personal data in the register is obtained from the individuals who submit photographs or videos.

### 8. Rights of the Data Subject

The data subject has the following rights under the GDPR:

- **Right to be informed** about the processing of personal data
- **Right of access** to personal data
- **Right to rectification** of inaccurate or incomplete data
- **Right to erasure** of personal data when:
  - processing is based on consent
  - erasure does not conflict with statutory obligations or public interest
  - data is no longer necessary for its original purpose
- **Right to withdraw consent** at any time
- **Right to object** to processing insofar as the processing is based on consent
- **Right to data portability**, provided that:
  - the data subject has supplied the data to the controller
  - the processing is based on consent
  - the processing is automated
- **Right to restriction of processing**, e.g. in relation to direct marketing

Requests must be submitted using the contact details in section 13.

The Industrial Union may request additional information to verify the requester's identity and may

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refuse the request on grounds permitted by applicable legislation.  
A data subject may exercise these rights **once per year free of charge**.

### Right to lodge a complaint

The data subject has the right to lodge a complaint with the competent supervisory authority (the Data Protection Ombudsman in Finland) or with the supervisory authority in their EU Member State of residence or workplace.

## 9. Disclosure and Transfer of Personal Data

Personal data may be disclosed to another controller only if the data subject has given **explicit consent** either at the time of data submission or afterwards.  
In this context, “another controller” does **not** refer to subcontractors, but to organisations that use the received personal data for their own purposes.

The Industrial Union may use subcontractors for essential functions, including the storage and management of image archives.

Personal data in the image archive may be processed by:

- Technical service providers, such as email service providers and cloud service operators.

## 10. Transfers of Data Outside the EU/EEA

As a rule, personal data in this register is **not** transferred outside the EU/EEA.

If personal data is processed outside the EU/EEA, the Industrial Union ensures that such processing:

- complies with applicable data protection legislation, and
- is based on appropriate safeguards as required under the GDPR.

Personal data may be processed in cloud services located outside the EU/EEA if the service provider is committed to GDPR compliance.

## 11. Data Security

Digitally processed personal data is protected and stored in systems managed by the Industrial Union, with access restricted to individuals who require such data for their work duties. These individuals use personal usernames and passwords. Storing personal data on paper is avoided.

Personal data sent outside the Union is encrypted. Workstations and storage media used for processing personal data are also encrypted.

## 12. Contact Information

Requests concerning data subject rights, questions about this Privacy Notice and other inquiries may be submitted by email to:

**tietosuojaava@teollisuusliitto.fi**

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Alternatively, contact may be made personally or in writing at:

Data Protection Officer

Industrial Union (Teollisuusliitto ry)

P.O. Box 107, FI-00531 Helsinki

Tel. +358 20 774 001

### **13. Updates to This Privacy Notice**

This Privacy Notice may be updated from time to time, for example due to changes in legislation or administrative guidance.

**Last updated: 10 December 2021**