

## **Privacy Notice – Industrial Union Membership Register**

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

### **1. Name of the Register**

Industrial Union Membership Register

### **2. Controller and Contact Person**

#### **Controller**

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

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

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

### **3. Categories of Data Subjects**

The register contains information on individuals who have joined a local branch of the Industrial Union or who have applied for membership.

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

The processing of personal data is based on the statutory obligations of the Industrial Union, including maintaining a membership register, and in certain cases on the performance of a contract between the Industrial Union, its local branches and the member, or on the legitimate interests pursued by the controller.

Personal data is used for providing services to members, such as newsletters, membership benefits, trainings, events, research, employment-related advice and legal assistance.

Personal data will be disclosed for marketing purposes or to other controllers only if the data subject has given explicit consent either when joining the Union (or a local branch) or subsequently.

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

The register may include the following categories of personal data:

- Name, telephone number and email address
- Postal address, postal code and city
- Information about the individual's workplace and employer
- Date of birth, personal identity code and nationality
- Information related to membership and membership fees
- Billing information: invoice date, amount, and date of payment

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- Information on payments of allowances and reimbursements
- Notes made by the controller regarding the individual's membership
- Notes made by the controller regarding the individual's activities within the Union
- Separate consents provided by the individual for the following:
  - Disclosure of data to cooperation partners for the distribution of marketing materials

### **6. Special Categories of Personal Data**

Trade union membership is considered a special category of personal data.

### **7. Personal Data Retention Period**

Detailed retention periods are defined in a separate data retention schedule.

Legislation sets different statutory retention periods for specific data categories.

Personal data processed on the basis of a contract is retained for the duration of the contract and for ten (10) years after its termination, due to contractual obligations.

Data processed on the basis of consent is retained until the consent is withdrawn.

The retention of personal data for the above-mentioned period after the end of active membership is regarded as a legitimate interest of the controller, as the data is used, for example, for reporting the Union's membership statistics.

### **8. Regular Sources of Information**

Personal data is obtained from the member and, concerning membership fees, either from the member (self-paying members) or from the employer (employer-collected fees). Information is also obtained from public authorities, insurance companies, the unemployment fund and other trade unions (e.g. in connection with membership transfer).

Personal data may also be collected and updated from controllers providing address or similar services, such as the Digital and Population Data Agency and Posti Corporation.

### **9. Rights of the Data Subject**

The data subject has the right to:

- Obtain information on the processing of their personal data
- Access their personal data and review data processed by the Union and its local branches
- Request the rectification or completion of inaccurate or incomplete data
- Request the erasure of their data when:
  - Processing is based on consent

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- Erasure does not conflict with statutory obligations or the public interest
- The personal data is no longer necessary for the purposes for which it was collected
- Withdraw their consent and object to processing insofar as the processing is based on consent
- Receive their personal data in a structured, commonly used electronic format and transmit it to another controller, provided that:
  - The data has been supplied by the data subject
  - The processing is based on consent
  - The processing is carried out automatically
- Request the restriction of processing, for example by requesting the termination of direct marketing

Requests related to the exercise of these rights shall be submitted in accordance with the contact details provided in this Privacy Notice.

The Industrial Union may request additional information to verify the identity of the requester before processing the request. The Union may refuse the request on grounds provided by applicable legislation. Each data subject may submit such a request once per year free of charge.

Members may view their personal information through electronic self-service channels.

### Right to lodge a complaint

Every data subject has the right to lodge a complaint with the competent supervisory authority (the Office of the Data Protection Ombudsman in Finland) or with the supervisory authority of the EU Member State of their residence or workplace, if they consider that their personal data has not been processed in accordance with applicable data protection legislation.

## 10. Disclosure and Transfer of Personal Data

Personal data is not disclosed to third parties except for statutory notifications to the unemployment fund, authorities and insurance companies, or when necessary for fulfilling membership-related rights and in accordance with data protection legislation and this Privacy Notice.

Personal data may be transferred when the service provider responsible for the system is replaced. A service provider performing technical maintenance or processing of the register may transfer personal data in accordance with applicable privacy legislation and this Privacy Notice.

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

As a rule, membership register data is not transferred outside the EU/EEA.

If personal data is processed outside the EU/EEA, the Industrial Union ensures that such transfers are always carried out in compliance with applicable data protection legislation. Personal data may be processed in a cloud service located outside the EU/EEA, provided that the service provider is committed to complying with the requirements of the EU General Data Protection Regulation.

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### **12. Data Security**

Digitally processed personal data is protected and stored in systems maintained by the Industrial Union, with access limited to individuals who require the data for their work duties. These individuals have 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 encrypted.

### **13. Contact Information**

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

tietosuojavastaava@teollisuusliitto.fi

Or by personal visit or written request to:

Data Protection Officer

Industrial Union (Teollisuusliitto ry)

P.O. Box 107, FI-00531 Helsinki

Tel. +358 20 774 001

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

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

Last updated: **26 April 2023**