

## Privacy Notice – Stakeholder Register

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

## Privacy Notice – Stakeholder Register

### 1. Controller and Contact Person

#### Controller

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

#### Contact for Data Protection Matters

Email: tietosuojaavastaava@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 work for, or act on behalf of, stakeholders of the Industrial Union.

The register may also temporarily contain personal data of individuals who have previously worked for or represented such stakeholders.

### 3. Purpose and Legal Basis for Processing

Only personal data necessary for the functioning of the Union and for fulfilling its statutory obligations is collected.

The purpose of processing is to maintain stakeholder communication, including distributing:

- bulletins
- statements
- invitations
- other relevant communications

The legal bases for processing are:

- **Legitimate interest of the controller** (Article 6(1)(f) GDPR), i.e. maintaining essential stakeholder relations; and
- **Consent of the data subject**, where applicable (Article 6(1)(a) GDPR), such as when contact information is provided directly by the data subject.

### 4. Personal Data Processed in the Register

The register may contain the following categories of personal data:

- Name
- Title or role
- Organisation

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- Organisation's general email address or the individual's work email address
- Possible additional information related to event registration (e.g. dietary restrictions); such event-specific data is stored only for the duration necessary to organise the event

### 5. Personal Data Retention Period

Information regarding key stakeholder contact persons is essential for the Union's operations and advocacy work.

For this reason, contact details are retained **until further notice**, based on the controller's legitimate interest.

The accuracy of the register is reviewed annually, and data of individuals no longer considered part of the Union's essential stakeholder network is removed.

### 6. Regular Sources of Information

Personal data in the register is obtained:

- from publicly available sources during the Union's normal operations, and/or
- directly from the data subject

The register may also contain notes made by the controller regarding the data subjects.

### 7. 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 their personal data
- **Right to rectification** of inaccurate or incomplete data
- **Right to erasure** 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 has been supplied by the data subject
  - processing is based on consent
  - processing is automated

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- **Right to restriction of processing**, for example 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 refuse a request where permitted by applicable law.

A data subject may exercise these rights **once per year free of charge**.

### Right to lodge a complaint

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

## 8. Disclosure and Transfer of Personal Data

Personal data may be disclosed to another controller only if the data subject has given **explicit consent** at the time of providing the data or afterwards.

In this context, "another controller" does **not** refer to subcontractors, but to entities that process personal data for their own independent purposes.

The Industrial Union may use subcontractors for essential operations and to facilitate communication with stakeholders. Personal data in the stakeholder register may be processed by:

- The Union's bulletin distribution service provider
- Other technical partners, such as email server and cloud service providers

## 9. Transfers of Personal 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 legislation and is based on the safeguards required under the GDPR.

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

## 10. Data Security

Digitally processed personal data is protected and stored in systems managed by the Industrial Union, with access restricted to individuals who require the 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 in processing personal data are also encrypted.

## 11. Contact Information

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

**tietosuojavastaava@teollisuusliitto.fi**

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

## **12. 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**