### PRIVACY STATEMENT

EU's General Data Protection Regulation (2016/679) Finnish Data Protection Act (1050/2018)

Date of issue: 1 January 2018

Updated on: 31 May 2022

### 1. Controller

The Trade Union for the Public and Welfare Sectors JHL (" JHL") Visiting address:

Sörnäisten rantatie 23, 00500 Helsinki

Postal address: P.O. Box 101, 00531 Helsinki

tel. 010 77031

### 2. Joint controllers

JHL maintains a membership register and makes decisions about membership maintenance together with its member branches. JHL and the member branch that the person has joined are the joint controllers of the member's personal information. Members can check their member branch in myJHL.

# 3. Contact person in matters concerning the register

Membership Services Manager Jutta Pekonen

jutta.pekonen@jhl.fi

Sörnäisten rantatie 23, 00500 Helsinki

tel. 010 7703 280

# 4. Contact information for the data protection officer

Data Protection Officer Hannu Viljanen

tietosuoja@jhl.fi

Sörnäisten rantatie 23, 00500 Helsinki

tel. 010 7703 427

## 5. Name of the register

Trade Union for the Public and Welfare Sectors JHL Membership Register

# 6. Purpose and legal basis of processing personal data

The Trade Union for the Public and Welfare Sectors JHL maintains a membership register, a centralised register that contains data on the members of JHL's branches. The information is used for course management and to manage membership and representation matters, compile statistical data,

register salaried employee roles and monitor unemployment fund memberships and payments. Under article 9.2(d) of the European Union's General Data Protection Regulation, processing is carried out in the course of legitimate activities with appropriate safeguards by an association with a trade union aim. Branch membership is based on a voluntary application. With member consent, JHL may also process members' personal data for direct marketing purposes.

## 7. Data content of the register

The register contains the following information about the data subjects:

### Personal and membership information

- Name
- Social security number
- Contact information: address, phone number, e-mail address
- Membership information
- Native language
- Language of preference (language of correspondence)
- Nationality
- Education
- Bank account details
- Membership fee information

### Employment and obligations to pay membership fees

- Employment and obligations to pay membership fees
- Collective agreement sector
- Occupation

#### Salaried employee roles

#### **Course information**

- Courses taken
- Food allergy information

### Interest representation information

- Cases related to membership and protection of members' interests
- Legal and dispute cases

#### Other information

- Magazine subscriptions
- Paid strike benefits
- Honorary memberships
- Member recruitment information
- Granted stipends and watches
- Merit awards

# 8. Storage period for personal data

Personal data is stored for as long as is necessary to carry out the tasks described in this privacy statement. Some data may be stored longer in situations required by the law, for instance in accordance with the storage periods determined in the Accounting Act or the Associations Act.

For example, information related to interest representation assignments is stored for six years from the end of the assignment, and membership fee information is stored for six years. All information concerning resigned members will be removed or anonymised at the latest 10 years from the end of membership.

## 9. Regular sources of data

As a rule, members themselves provide the data upon joining one of JHL's member branches. In addition, JHL will get change of address information from Posti's change of address service, membership fee information from members' employers, and membership-related information from Statistics Finland.

## 10. Regular disclosures of data

Member information is disclosed with members' consent to the unemployment fund and the insurance company through which the union's member insurance is arranged.

Member information can also be disclosed with the member's consent to the Central Organisation of Finnish Trade Unions (SAK) for conducting research.

The personal data of individuals participating in JHL Institute's courses may be disclosed, for instance, to travel organisers, hotels, colleges/training centres and the Finnish National Agency for Education's Koski service.

When carrying out its tasks that comply with this privacy statement, JHL also makes use of subcontractors. JHL concludes agreements with these actors about a sufficient level of data protection and the legal basis for processing.

### 11. Transfer of data out of the EU or EEA

As a rule, personal data is not processed outside of the European Union or the European Economic Area. The personal data of individuals participating in JHL Institute's courses may be disclosed to travel organisers that operate outside of the European Union or the European Economic Area. In such a case, an explicit consent for transfer will be requested of the data subject.

### 12. Principles of register protection

The register has been protected with the appropriate technical and organisational measures to ensure the information security of personal data.

All telecommunications are encrypted with the best possible encryption technology.

# 13. Rights of data subjects

### **Right of access**

Exercising the right of access is free of charge. However, if the data subject makes repeated requests for information, the controller has the right to charge an administrative fee. Individuals who wish to access information pertaining to themselves can view their membership information in myJHL or make a GDPR information request concerning the service.

#### Right to demand correction or erasure of data

To the extent that data subjects can act independently, they must on their own initiative without undue delay after having received news of an error to correct, erase or complete the personal data in the register which is erroneous, unnecessary, insufficient or outdated in terms of the purpose of processing.

To the extent that data subjects cannot correct or erase data themselves, requests for the correction or erasure of data must be addressed to the Membership and branch services unit:

tel. 010 7703 430

jasenpalvelu@jhl.fi

### Right to restrict and object

Data subjects have the right to restrict the processing of their personal data, for instance in a situation where the data subject is waiting for the controller's reply to their request concerning the correction or erasure of their data. In certain situations, data subjects also have the right to restrict the processing in its entirety.

### Right to withdraw one's consent

If the processing of personal data is based on the data subject's consent, the data subject has the right to cancel their consent by notifying the controller.

## 14. Automated decision making and profiling

JHL will not conduct profiling or automated decision making on the data subjects.

## 15. Right to lodge a complaint

If the data subject considers that their rights are being violated, it is hoped that the data subject will primarily contact the data protection officer mentioned in this statement. If necessary, the data subject may lodge a complaint to data protection authorities.

Office of the Data Protection Ombudsman 029 56 16670