

# Privacy notice

Ilmoita service

(Last updated on 18 November 2019)

## 1. Controller and contact person of the register

The controller is Vastuu Group Oy's customer company that uses the Ilmoita service and is the employer of the data subject.

Controller's supplier responsible for the provision, development and customer support of the Ilmoita service and its interfaces is:

Vastuu Group Oy, Business ID 2327327-1 (the "Supplier")  
Tarvonsalmenkatu 17 B  
02600 Espoo, Finland

Data Protection Officer's contact details:

Email                dpo@vastuugroup.fi

Regular mail        Vastuu Group Oy  
Data Protection Officer  
Tarvonsalmenkatu 17 B  
02600 Espoo, Finland

## 2. Data subjects

Data subjects are the employees, managers, trainees (not working on an employment contract), or volunteer workers of the controller (Supplier's customer).

## 3. Basis for and purpose of personal data processing

The legal basis for personal data processing is the contract signed between the controller and the data subject (employment contract), fulfilling a legal obligation of the controller (reporting obligation within the construction sector), and a legitimate interest of the controller.

The Ilmoita service allows the controller to transfer employer and employee data in an electronic format to the purchaser of the work, the main contractor of the building site or other administrator of the work site.

## 4. Which personal data is collected and from what sources?

The controller will store the following categories of personal data in their employee register in the Ilmoita service:

- first name, last name
- identity number, tax number, date of birth
- picture
- type of employment relationship
- employer name, company number, address, company representative and contact details
- nationality
- phone number
- email address

- Valtti card delivery address
- country of residence
- employee's status as a posted worker and information of the respective A1 certificate
- home address in Finland (will be removed as of 1 January 2020)
- address in the country of residence (will be removed as of 1 January 2020)

The following data will be added to each data subject's personal data during use of the service:

- information when employee data has been modified
- information concerning when the employment data has been verified by the employer
- information if the person is registered in the Tax Authority's tax number register
- status of ePerehdytys subscription
- status of Valtti card

In addition, card and competence data retrieved from Supplier's Valtti card register and Taito Competence Register can be linked to the personal data of data subjects when the personal data concerned is transferred.

## 5. Regular disclosure and transfer of personal data

The controller can transfer their own employees' personal data to their business partners through the Service for the following purposes:

- preparation of the employee list at the construction site, pursuant to section 52b of the Occupational Safety Act (738/2002)
- verification of the validity of the picture ID required at the construction site, pursuant to section 52b of the Occupational Safety Act (738/2002)
- performance of employee inductions at the construction site as set out in the Occupational Safety Act (738/2002) and taking care of all other required activities for ensuring and promoting safety at work;
- preparation of monthly employee reports for the Finnish Tax Administration (section 15 b of the Tax Procedure Act (1558/1995))
- compliance against other legal or contractual obligations;
- access control at the construction site or other work site;
- verification of professional competences of a person being inducted at the construction site or other work site;
- verification of professional competences required for a work task;
- ensuring compliance against occupational safety regulations;
- direction of the work at the construction site or work site;
- ensuring the contracting party's compliance against contractual terms or applicable quality, operative or similar standards;
- ensuring that contractors or independent workers operating at a partner's building site or other work site comply with the contract, and
- with the data subject's explicit consent for other purposes.

The transfer of personal data will be conducted using application interfaces provided by the Supplier in a manner ensuring that the employee's personal data is transferred when the employee has provided her/his Valtti card credentials, or when the business relationship between the controller and the receiver of personal data is recognised in any other manner.

The Supplier can disclose data contained in the Building Site Register to the authorities based on the mandatory requirement of a competent authority, or when the Supplier considers the inquiry of the authority to be justified in order to investigate suspected misuse of their services.

In the production of the Building site register service, the Supplier can use subcontractors located within the European Economic Area, and can also transfer personal data to such subcontractors for producing the service.

## 6. Transfers outside the EU and EEA

As a rule, personal data is not conveyed outside the EU or the European Economic Area.

## 7. Storage period of personal data

During the use of the service, the controller is responsible for maintaining the data saved in its employee register and for entering the end of each employment relationship into the register. Employment and personal data of each former employee will be stored in the service for the minimum of 18 months, which is the time during which users of the service that acted as the main contractor can make correction notifications in the employee reports they have submitted to the Finnish Tax Administration. If the user company discontinues their operations without marking the employment relationships as having ended, the Supplier can do this on its own initiative.

Once the employment relationship has ended, the employment and personal data of the employee can be stored in the work site register of the main contractor that uses Supplier's work site register services, for as long as the information concerned is needed for the purposes mentioned above by other customers. The minimum data storage period in accordance with the Taxation Procedure Act (1558/1995) is six years from the end of the year when the building site was completed.

## 8. Rights of data subjects

As a data subject, you have the right to inspect the personal data concerning yourself and demand that any incorrect data be corrected or deleted. However, we can, within the limits of law, restrict your right to access data that contains the personal data of others, is a business secret of ours or our customer, or is related to the safety features of the service.

You have the right to request that your personal data be deleted in situations specified in the general data protection regulation, if:

- you cancel your previous consent and there is no other legal basis for processing the data concerned besides your consent
- you object to the processing of your personal data, and there is no legal basis for continuing the processing
- processing the data is illegal
- you are under 18 and your personal data was collected in connection with providing information society services.

In situations specified in the general data protection regulation, you have the right to object to the processing of your data or to request that the processing of your data is restricted. If you consider the processing of your personal data to be illegal, you can submit a complaint on the processing to a competent authority.

## 9. Data security

The right to use the register is restricted to appointed persons only, who need the information concerned in their work tasks. Each user has his/her own user name and password. Personal data is stored in databases and data systems located within the European Economic Area that have the appropriate

technical and organisational measures in place to protect the personal data against misuse and disclosure.

#### 10. Contacts

If you have questions regarding this privacy notice or you wish to exercise your rights, please contact Supplier's Data Protection Officer by using the above email or postal address.

#### 11. Changes

We can make changes to this privacy notice from time to time without a separate notice. Any changes made are listed in the "last update" section at the beginning of this privacy notice.