

## Privacy statement: personnel register 2018

Familiarise yourself with the privacy statement pertaining to the Frame Foundation's person register. The Frame Foundation is committed to managing personal data according to privacy laws and good data processing practices. Privacy laws here refer in particular to the EU's General Data Protection Regulation and national personal data legislation.

### **Data controller**

Name: Frame Foundation.

Business ID: 2475893-2

Ratakatu 1 b A O, 001290 Helsinki, Finland, Tel. +358 405070809

### **Name of the register**

The Frame Foundation Personnel Data Register

### **Register contact person**

Head of Administration and Finances Satu Martin

Ratakatu 1 b A O, 001290 Helsinki, Finland, Tel. +358 40 5070809, satu.martin@frame-finland.fi

### **The purpose, legal basis and data sources of personal data processing**

The personal data is used for the Foundation's administrative tasks.

### **The legal basis for processing is one or a several of the following:**

- The applicant's voluntary, ascertained, informed and unambiguous expression of consent with which they approve of the processing of their data
- Fulfilling an agreement where the data subject is one of the parties, or procedures completed before the agreement at the request of the data subject
- To meet the legal obligations of the data controllers

Data sources include:

- The data subject
- Personnel decisions
- Payroll administration system

For the sake of clarity, it must be noted that if the applicant withdraws their consent, the Frame Foundation has the legal basis, warranted by legitimate interests, to process personal data in order to fulfil its purpose.

### **The register's data content**

Name, birthplace, personal identity number, address, phone number, email address, place of residence, degree, office or post, account number, tax district or municipality, nationality, language, sex and native country for foreign applicants. Employment relationship, payroll data, absences, annual holidays and leaves of absence.

### **Register users**

The personal data will be processed by the Foundation's Director, selected staff, selected evaluators appointed by the Foundation, the Foundation's Head of Administration and Finances, the Foundation's board, selected staff of the accounting firm and accountants. Access is controlled by limiting it to read-only rights or to updating only those fields that are required by the user's tasks.

### **Register protection**

Digital materials are encrypted with passwords and data transfer uses encrypted data-transfer systems.

Other materials are stored in locked cabinets and secured so that outsiders will not be able to access them and they cannot be destroyed, altered, released, transferred or accidentally or otherwise illegally processed. The applications are stored according to the Frame Foundation's filing plan. Obsolete documents are shredded.

The Frame Foundation is committed to following adequate safety measures in all its operations in order to secure personal data. For the sake of clarity, it must be noted that adequate safety measures refer not only to technical measures such as virus protection, firewalls and physical access controls, but also to organisational measures such as maintaining sufficient and specialised resources and the sufficient briefing of personnel. The Frame Foundation regularly evaluates the efficiency of the aforementioned measures in order to secure the safety of personal data. The Frame Foundation processes the personal data confidentially and ensures that its staff and/or subcontractors have signed a non-disclosure agreement and/or they are otherwise bound by a non-disclosure obligation.

### **Releasing data**

Data from the register is regularly transferred to the following Foundation systems:

Payroll system, the Gruppo register and occupational health services. The data may also be transferred to other Foundation systems and released to the authorities in accordance with existing legislation.

When necessary, personal data may be transferred via an electronic user-connection and processed by experts outside the Frame Foundation within and outside the EU region according to the guidelines and aims defined by Frame.

### **Personal data storage period**

Personal data is stored for ten years (Contract of Employment Act chapter 6 § 7)

### **Data subject rights**

The registered data subjects are entitled to view stored information about themselves, they have the right to demand changes to erroneous information and incomplete information to be completed or deleted if there are no legal grounds to store the information. The data subjects are also entitled to request restrictions to the processing of their information, to oppose the processing of information pertaining to them and the right to transfer information pertaining to them from one system to another.

The data controller may request the person making the request for proof of identity when necessary. The data controller will send a reply to the client within the time noted in the privacy law (usually within a month).

Requests for reviews and corrections must always be presented to the contact person responsible for issues related to the register.

**Right to complaints**

The applicant and grant recipient have the right to issue a complaint to the supervising authorities if they suspect their personal data has been processed erroneously.