

## PERSONNEL AND SALARY ADMINISTRATION PRIVACY STATEMENT

This is Clinical Research Institute HUCH's combined information and privacy statement on the processing of personal data in accordance with the EU General Data Protection Regulation (GDPR, 2016/679). Drafted May 21, 2018

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This statement informs employees of Clinical Research Institute HUCH and recipients of salaries and/or remunerations about how their personal data is processed by the Institute.

The EU General Data Protection Regulation (GDPR) 2016/679 came into force on May 24, 2016. The application of the GDPR began after a transition period on May 25, 2018, after which the processing of all personal data falling within its scope must be GDPR-compliant.

The definition of "personal data" used in GDPR is considerably broader than the definition in the Finnish Personal Data Act: "[A]n identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."

According to the GDPR, an email address or the IP address of a smartphone, for example, comprise personal data if they can be employed to identify the user of the device.

The GDPR includes many issues that were already covered in their main respects in Finnish legislation, but also entirely new obligations. The following sections provide concrete examples of how the Institute processes the personal data of employees and recipients of salaries and/or remunerations.

### 1. Register controller

**Clinical Research Institute HUCH, [hyksinstituutti@hus.fi](mailto:hyksinstituutti@hus.fi)  
Haartmanninkatu 8, P.O. Box 700, FI-00029 HUS  
Tel. + 358 9 4711**

### 2. Contact and responsible person

The contact person responsible for the register is the officer in charge of HR at Clinical Research Institute HUCH. His contact details are provided below:

Financial Manager Ilkka Talvio, 09 471 71706  
[ext-ilkka.talvio@hus.fi](mailto:ext-ilkka.talvio@hus.fi), P.O. Box 700, FI-00029 HUS

The contact person responsible for the personnel and salary administration register is Ilkka Tavio, Financial Manager at Clinical Research Institute HUCH. The contact person responsible for the register ensures that register functions are planned and implemented in accordance with regulations and provisions together with the Data Protection Officer of HUS.

Clinical Research Institute HUCH is a limited liability company that is wholly owned by the Hospital District of Helsinki and Uusimaa (HUS). The Data Protection Officer (DPO) of HUS Group is also the DPO of Clinical Research Institute HUCH.

**You can contact the HUS DPO at: [eutietosuoja@hus.fi](mailto:eutietosuoja@hus.fi), Petri Hämäläinen, 09 47173936, 050 4270549**

The task of the contact person is to answer questions and queries about the register. In addition, payroll clerks will provide information related to their tasks.

- 1) Financial Manager Ilkka Talvio, [ext-ilkka.talvio@hus.fi](mailto:ext-ilkka.talvio@hus.fi)  
P.O. BOX 700, FI-00029 HUS
- 2) Payroll Clerk Jaana Vanhanen, [jaana.vanhanen@hus.fi](mailto:jaana.vanhanen@hus.fi)  
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- 3) Substitute Payroll Clerk Merja Kuvaja, ext-merja.kuvaja@hus.fi P.O. Box 700, FI 00029 HUS

### 3. Register name **Personnel and salary administration register**

### 4. Purpose and legal basis for processing personal data

The legal basis for processing personal data at Clinical Research Institute HUCH with respect to the personnel and salary administration register in accordance with GDPR is always one of the following three:

- I. consent of the person (documented, freely given, specific, informed and unambiguous)
- II. an agreement to which the data subject is a party
- III. legitimate interest of the register controller, such as an employment relationship.

#### **Data is not used for automated decision-making or profiling.**

With the register, the Institute carries out the tasks that belong to it as an employer under law and collective bargaining agreements. The data that the Institute requires on its employees and shop stewards in the handling of its employer tasks is entered into the system. The most typical areas in which this data is used are:

- payroll accounting and salary payment
- storing data that affects pensions
- collecting withholding taxes
- determining the benefits of salary earners
- compiling statistics on personnel

The upkeep of the register is based on legislation such as:

- General Data Protection Regulation (2016/679)
- Act on Checking the Criminal Background of Persons Working with Children (504/2002)
- Act on the Protection of Privacy in Working Life (759/2004)

### 5. Data content of the register

The personnel and salary administration register consists of paper documents or information systems that contain data required for the individual identification of people, such as name, personal identity code and contact information, as well as information on pay and service relationship. The necessary information is entered into the register.

- 1) Existing documents relevant to the competence of a person and the terms and conditions of his/her service relationship, such as copies of school, education and work certificates, commissions, employment contracts, decisions on leaves of absence, etc.
- 2) Written employment contracts made with persons.

#### **The register consists of the following information systems:**

- 1) Digia Enterprise 7.4
- 2) Outlook email boxes are used for handling employee pay-related issues
- 3) Through Basware, Digia's salary administration automation system, salary calculations are sent to Aditro, which in cooperation with Finnish banks produces the salary calculations for e-banking purposes.

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### The register may contain the following data on personnel:

#### Personal information

- name
- personal identity number
- address
- telephone number
- email
- bank
- mother tongue
- date of presenting extract from criminal records

#### Information on employment relationship

- job title
- start date
- end date
- reason for ending
- collective bargaining agreement applied
- type and nature of service
- operating unit
- pay grade code

#### Salary information:

- basic salary with supplements

#### Pension information

- pension arrangements

#### Taxation

- information from tax card

#### Deductions

- trade union information: association, branch
- debt recovery information

#### Annual holidays

- holiday rights
- holidays taken
- debt recovery information

#### Other absences:

- absences due to illness
- unpaid leave
- training Travel invoices

## 6. Regular sources of information

The register is updated with information submitted by the recipient of salary and remunerations when the service relationship begins. The data is also updated with decisions made concerning service relationships. All data updates with an effect on salary and the terms and conditions of the service relationship are based on written documentation.

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The data affecting each accounting period are updated in connection with each payroll run. Salary earner-specific withholding information is updated at least once a year. Clinical Research Institute HUCH electronically sources withholding tax information from the Tax Administration for those employees who were in a service relationship at the beginning of the year. To some extent, the Institute makes use of other HUS personal registers (email addresses), Varma (pension insurance) and the tax authorities, and other authorities and courts as necessary. In addition, the Institute sources information from other organizations on personnel transferring to the employ of the Institute pursuant to the act on transfer of personnel and provisions on business transfers.

If personal data is collected from sources other than the employee, the consent of the employee is sought. However, consent is not required when an authority discloses data to the employer in order to perform its statutory tasks or when the employer obtains personal credit history or criminal record information to establish the reliability of the employee.

The employee will be informed before such information is obtained for the purposes of establishing reliability. If data on the employee is obtained from sources other than the employee, the employee will be informed of the acquired information before it is used in decision-making concerning said employee.

### 7. Regular disclosure of data

Data subjects (salary and/or remuneration recipients and shop stewards) are provided with an electronic itemization of their most important basic information, paid salary and withholding amounts in connection with each salary/remuneration payment.

Individual-level personal data is provided, pursuant to the applicable legislation, as a mass transfer to the tax authorities once a year, to Keva and trade unions four times a year, to Statistics Finland twice a year and to occupational healthcare once a year. Statistics on absences due to illness are submitted to occupational healthcare three times a year. Banks are provided with information for the payment of salaries and remuneration.

Pursuant to acts and decrees, personnel data from the register is disclosed to the following parties:

- ✓ Trade unions
- ✓ Pension insurance institutions
- ✓ The Social Insurance Institution KELA
- ✓ Banks
- ✓ Statistics Finland
- ✓ Occupational healthcare (name, personal identity code and organization unit)
- ✓ Labor authorities
- ✓ Debt recovery authorities
- ✓ Insurance companies
- ✓ Tax authorities
- ✓ Ministry of Social Affairs and Health
- ✓ Uusimaa Province
- ✓ Courts and other authorities upon request on a case-by-case basis Parent company and subsidiaries

### 8. Transfer of data outside the EU or EEA

**Data is not transferred outside the EU or EEA. Data is not disclosed to third parties for marketing purposes.**

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Upon the completion of some of our training programs, you will be given a certificate by a third party. In such cases, we may disclose the information necessary for granting said certificate, such as your name, to the party granting the certificate.

### 9. Principles of register protection

Care is taken in the processing of the register and data processed with information systems is appropriately protected. When register data is stored on Internet servers, the physical and digital information security of the hardware is appropriately safeguarded. The register controller ensures that stored data, server access rights and other data that is of critical importance for the protection of personal data are processed in confidence only by those who are employed to do so.

When employees sign their employment contract with Clinical Research Institute HUCH, they commit to non-disclosure, both at and outside work, of any confidential information related to their work or of which they become aware. This non-disclosure obligation continues after the end of the employment relationship.

Register data may only be accessed by persons who require it in the performance of their jobs. Payroll clerks and the financial manager may access the data.

The register data is processed with the due care required by the GDPR. Protection is based on passwords and other restrictions to ensure that unauthorized persons cannot access the data.

Hardcopy materials are stored in locked premises that can be accessed only by those who need to access them in the performance of their work.

According to Article 5 of the GDPR, personal data must be accurate and, where necessary, kept up to date; controllers must take every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ("accuracy").

### 10. Rights of data subjects

Data subjects have the right to request that their personal data be erased from the register ("right to be forgotten"). Furthermore, data subjects also have other rights under the GDPR. You have the right to be:

- ✓ informed of the processing of your personal data;
- ✓ obtain access and inspect your personal data;
- ✓ ask for incorrect or inaccurate personal data to be corrected and supplemented;
- ✓ demand erasure of your personal data;
- ✓ withdraw consent and object to the processing of your personal data insofar as said processing is based on your consent;
- ✓ object to the processing of your personal data on the basis of grounds relating to your personal situation insofar as the processing of this personal data is based on our legitimate interest;
- ✓ receive your personal data in a machine-readable format and send it to another controller, provided that you have personally submitted said data to us, we process the data on the grounds of an agreement or your consent, and this processing is automated; and
- ✓ request the restriction of the processing of your personal data.

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Requests are to be sent in writing to the controller or can be presented when visiting in person. The controller will ask the person making the request to prove their identity if required. The controller will reply to the customer within the time limit set in the GDPR (generally within one month). An individual data subject can personally check the registered personal data by making an appointment with a payroll clerk.

### 11. Other rights concerning processing of personal data

#### Information on state of health

According to Section 5 of the Act on the Protection of Privacy in Working Life, the employer has the right to process information concerning the employee's state of health only if the information has been collected from the employee him/herself, or elsewhere with the employee's written consent, and the information needs to be processed in order to pay sick pay or other comparable health-related benefits or to establish whether there is a justifiable reason for absence or if the employee expressly wishes his/her working capacity to be assessed on the basis of information concerning his/her state of health. In addition, the employer has the right to process such information in the specific circumstances, and to the stipulated extent, separately provided elsewhere in the law.

Information concerning the employee's state of health may only be processed by persons who prepare, make or implement decisions concerning employment relationships on the basis of such information. The employer shall nominate such persons or specify the tasks that involve processing of health-related data. At the Institute, the immediate supervisor of the employee, payroll clerks and the Financial Manager have the right to process this data. Persons who process such data may not disclose any of it to a third party either during or after an employment relationship.

A doctor's certificate or statement concerning the employee's working capacity given to the employer by the employee may, however, be supplied to the occupational health service provider for the purpose of carrying out the occupational health care duties laid down in the Occupational Health Care Act (1383/2001), unless the employee has forbidden this. The employer must store any information in his or her possession concerning the employee's state of health separately from any other personal data that he or she has collected.

### 12. Presenting an extract from the criminal record

According to Section 3 of the Act on Checking the Criminal Background of Persons Working with Children, the employer shall ask the person in question to produce an extract from the criminal records referred to in Section 6(2) of the Criminal Records Act (770/1993).

This extract is requested the first time when a person is hired or appointed to an employment relationship or a public-service employment relationship which involves, on a permanent basis and to a material degree, and in the absence of any person who has custody of the child, raising, teaching, caring for or looking after a minor, or other work performed in personal contact with a minor. An extract is also requested the first time an employee is assigned to such duties.

The only entries made in the personal data of a person requested to present an extract from the criminal records are that the extract was presented. The extract is returned to the person without delay. Information from the extract is not disclosed to any persons other than those who need it to make a decision on whether the person will be assigned tasks covered by the act.

### 13. Right to lodge a complaint to the supervisory authorities

**Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the**

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**Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the GDPR.**

### **Contact information of the supervisory authority:**

**Office of the Data Protection Ombudsman**

**Visiting address: Ratapihantie 9, 6th floor, FI-00520 Helsinki**

**Postal address: P.O. Box 800, FI-00521 Helsinki**

**Exchange: 029 56 66700**

**Fax: 029 56 66735**

**Email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)**