

Tinankuja 3, 02430 Masala

# PRIVACY STATEMENT: HR STORE PERSONNEL REGISTER IN THE DOCUMENT MANAGEMENT SYSTEM

#### 1 CONTROLLER

KLINGER Finland Oy, Tinankuja 3, 02430 Masala.

Telephone number +358 10 400 1011

E-mail info@klinger.fi

Business ID 0195519-1

#### 2 CONTACT PERSON RESPONSIBLE FOR THE REGISTER

Tea Hurme

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Telephone number +358 10 400 1222

## 3 NAME OF REGISTER

HR store personnel register in the Document Management System

#### 4 LEGAL BASIS AND PURPOSE OF PROCESSING PERSONAL DATA

The HR store personnel register in the Document Management System contains documents and data connected to the employees of KLINGER Finland Oy.

The legal basis for processing personal data according to the EU General Data Protection Regulation is:

- » a contract, i.e. an employment relationship based on an employment contract, whereby KLINGER Finland as the controller processes the personal data of the registered person for the purposes of execution of the employment contract, and
- » statutory obligation, i.e. KLINGER Finland is obliged to disclose the payroll details of its employees, for example to social security and taxation authorities for the fulfilment of its statutory obligations

The purpose of processing the personal data is to fulfil obligations as an employer.

The data are not used for automated decision-making or profiling.



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#### 5 DATA CONTENT OF THE REGISTER

The documents or data recorded in the register are:

- » job applications
- » employment contracts
- » onboarding forms
- » development discussions
- » employment certificates
- » warnings
- » early support discussions
- » notices of dismissal
- » agreements on termination of employment
- » payslips
- » commission statements
- » payrolls (remuneration cards)
- » travel expense claims
- » car taxation calculations
- » portrait photos
- » lists of participants at personnel events
- » visa applications
- » training certificates
- » KELA compensation applications
- » sickness leave certificates
- » sickness leave notices
- » accident reports
- » work capacity negotiations
- » person registers
  - » sickness leave register
  - » training register
  - » statistics on new, former, retiring employees and employee numbers
  - » accident statistics
  - » statistics on flexible working hours
  - » overtime statistics

The data are stored for the period specified in the Accounting Act and other employment legislation. The supporting documentation of accounting must be stored for six years from the end of the calendar year, during which the financial year ends. The supporting documentation of payroll includes, for example, salary calculations, salary combinations and unused rolled-up holiday pay calculations and documents providing proof of the accounting of foreclosure payments and union fees. Doctor's certificates, which prove a business event, such as a salary paid for the period of sickness leave, are supporting documents.

Financial statements, annual report, accounting records and the chart of accounts as well as the list of accounting records and materials must be stored for at least 10 years after the end of the accounting period. As to the reports of payroll accounting, the 10-year storage period applies to materials equivalent to accounting records, lists of paid salaries with postings and payroll cards by salary periods. Liikearkistoyhdistys ry recommends 50-year storage period for payroll cards. The 50-year storage period is based on the fact that pensions are determined based on that information. In practice, the longer storage period concerns at least the information from a period prior to the enforcement of the Employees Pensions Act (2006), in which case 10 years should suffice for later data. In KLINGER Finland Oy, payroll cards are stored for 50 years.



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The HR store of the Document Management System was taken into use in the company in 2016. Some of the documents, which are from an earlier period are stored in the locked office of the HR and financial coordinator, or in a locked archive.

Deletion is not automated. Deletion is performed once a year and is organised by the contact person responsible for the register.

#### 6 NORMAL SOURCES OF INFORMATION

The data saved in the register are obtained from the ERP employee register, employees of person register, employment contracts, healthcare service, superiors, etc.

## 7 NORMAL PROVISION OF DATA AND DATA TRANSFER OUTSIDE THE EU OR EEA

Normally, the data of the register are not provided to anyone or for no purposes other than those stipulated by law. The personal data of employees saved in the register are provided to the authorities pursuant to the procedure provided and required in the valid legislation, as well as to other parties, who have statutory right to receive information from the register, such as the tax authority, pension companies, insurance enterprises, Employers' Association, etc.

Lists of participants at personnel events are delivered to third parties (such as shipping companies), should it be necessary due to the nature of the event.

The data are also not transferred outside the EU or EEA by the controller.

#### 8 REGISTER PROTECTION PRINCIPLES

The register is managed with due care and the data processed with data systems are protected by appropriate measures. When the registry data are stored on Internet servers, the physical and digital data security of such equipment is managed by appropriate measures. The controller makes sure that the recorded data and the user rights for servers as well as other data critical for the protection of personal data are treated confidentially and only by employees, whose job description includes such task.

The financial director and HR and financial coordinator have the read-only access and user rights to the person register of the whole Document Management System. Persons with employment relationship have read-only access to documents, where the metadata mention them as an employee. Some documents name in addition to the employee also a person in charge, who has read-only and editing right to the given document (for example, in case of development discussion documents). The Managing Director has read-only right to employment contracts. The Managing Director, the sales manager of the given field and employee's superior have access to the individual sales statistics of employees. All employees have the read-only right to the photos of all persons. Travel invoices follow a route, where the travel invoice of an employee is routed to the superior for approval before payment.

# 9 THE RIGHT OF ACCESS AND THE RIGHT TO REQUEST RECTIFICATION OF DATA

Each person in the register has the right to access the data recorded in the register about them and to request rectification of possible inaccurate data or updating incomplete data. Should a person wish to view the data recorded about them or request rectification thereof, such request should be sent to the controller



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in writing (tietosuojavastaava@klinger.fi). The controller may request the applicant to provide proof of identity, if necessary. The controller responds to the customer within the time limit laid down in the EU Data Protection Regulation (as a rule, within a month).

## 10 OTHER RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA

A person in the register has the right to request erasure of their personal data (the "right to be forgotten"). The persons in the register have also other rights provided in the EU General Data Protection Regulation, such as restricting the processing of personal data in certain situations. The requests should be sent to the controller in writing (tietosuojavastaava@klinger.fi). The controller responds to the customer within the time limit laid down in the EU Data Protection Regulation (as a rule, within a month).