

# PALKKAUS.FI: PRIVACY STATEMENT

Updated: 30 September 2021

Palkkaus.fi's Personal Data register ("the Register"), the controller of which is Payroll Finland Ltd (business ID 2554393-3), at the address Kirkkokatu 1, 00170 Helsinki. Contact: [aspa@palkkaus.fi](mailto:aspa@palkkaus.fi)

"Service" refers to the service package consisting of the Palkkaus.fi service of Payroll Finland Ltd, the website at the address <https://www.palkkaus.fi> and related websites (collectively, "the Website") and communications, for example by email or telephone.

"User" refers to an employer, representative of an employer, or an employee who uses the Service.

## 1 Data and data sources

This explains what information is collected for the Register, and from what sources.

### 1.1 Customer register information

The contact information of the User or of a contact person of the User is collected to manage customer relationships, develop business operations and ensure a better customer experience across all channels, and for marketing communications. With the customer's consent, where consent is required, information in the Register will also be used for sending newsletters, event invitations and press releases. Processing is based on Palkkaus.fi's legitimate interest and, for Users who have made use of the Service, on the terms of use accepted by them.

The following information may be collected in the customer register:

- Name, user ID, email address or other electronic channel contact information, IP address, postal address and telephone number

Information is also collected in the customer register through the contact forms on the Website of the Service.

### 1.2 Customer service

Palkkaus.fi's customer service may receive Personal Data of individuals that are not necessarily related to salary payments made by Users on the Service. The collection of data is based on the fulfilment of legal obligations.

In customer service situations, the following information may be collected:

- Personal identification number, job title, tax card details, bank account number and User-specific service settings
- Salaries paid and/or received
- Information on statutory insurance policies purchased through the Service or otherwise registered with the Service
- User IP address and browser data
- The beneficial owners of the User and any shareholder data stored by the User in the Service.

The situation referred to in this paragraph may occur, for example, if Palkkaus.fi customer service receives contacts (for example, by email or letter) and with them personal data from employers or employees who are not Users of the Service or employees or employers of Users, or persons in charge or contact persons.

In situations such as the above, Palkkaus.fi is required to collect personal data, because it is necessary to store and examine the data in order to investigate the matter and provide customer service in accordance with the law. It is also not always possible to clearly identify personal data that is not part of the Service.

### **1.3 Settlement of payment transactions**

In the course of providing the Service, Palkkaus.fi may also become aware of payment transactions involving parties other than the Users.

Data related to these transactions is collected because Palkkaus.fi is required by law to know the beneficial owners of the funds in the account.

For example, it may happen that a pooled account managed by Palkkaus.fi and used in the Service receives a statement that is not made or authorised by the Users. To process such a payment transaction, we may also need to collect and store personal data from individuals who are not Users of the Service.

### **1.4 Connected services**

Palkkaus.fi does not collect Personal Data from individuals who are not Users of the Service for services connected to the Service.

### **1.5 Automatically collected data**

Palkkaus.fi uses tracking technology, or cookies, to collect data about, among other things, browser programs, operating systems, internet traffic, site traffic and similar activity on the Website.

If the User has allowed the use of cookies, the data collected by cookies can also be used to target advertising in online communications. If cookies are not allowed, we do not collect any data.

The User can choose how cookies are used in their browser. For example, the User can also adjust the settings of their browser to provide a warning of cookie use when visiting websites that use cookies, or the settings can be adjusted to block cookies altogether. However, if the User blocks the use of cookies, they may not be able to use all the features of the Website. The User should note that settings related to cookies must be adjusted in each browser program and on each computer or device separately.

## 2 Use of collected data

Palkkaus.fi uses personal data contained in the Register to provide the Service and customer service. The Service is maintained and Personal Data is Processed in accordance with the valid legislation, and the data is processed as required by the Data Protection Laws.

The grounds for data processing are listed in the itemisation of data in section 1.

If the User has allowed the use of cookies on the Website, the data obtained from the cookies may be used for targeting advertising.

The User has the right to prohibit the sending of communications other than those related to the operation of the Service, the requirements of public authorities, payroll legislation, quality assurance, and development of the Service.

## 3 Disclosure of information

Personal Data is disclosed only for the purpose of fulfilling salary payment-related statutory obligations, for example to the Tax Administration, earnings-related pension insurance companies, occupational accident insurance companies and the Employment Fund.

Information may be disclosed to group companies that are necessary for the provision of the Palkkaus.fi Service.

Personal Data can only be transferred outside the European Union or European Economic Area if the necessary safeguards are in place, such as the following:

- The country has been found by the EU Commission to have an adequate level of protection for personal data.
- Safeguards are ensured by using the model clauses provided by the EU Commission in agreements on the transfer of personal data.

## 4 Subcontractors as Processors

From a data protection perspective, a subcontractor is a party that provides a service offered by Palkkaus.fi under the name of Palkkaus.fi, either in part or in full. In such cases, Personal Data may be transferred to a subcontractor for processing, in which case the data in question is information related to the use of either Palkkaus.fi's or the partner's product or service that is transferred between the products or services using a technical integration.

For subcontractors processing Personal Data used in the provision of the service, Palkkaus.fi strives to ensure that the contractual clauses used by subcontractors are always up to date with the latest legal practices related to the EU General Data Protection Regulation (GDPR).

Information shared with subcontractors is protected by appropriate means and processed in accordance with the Data Protection Act.

## 5 Checking, rectifying and deleting data

Users can check and rectify their Personal Data by logging in to the Service or by contacting Palkkaus.fi customer service (last paragraph).

Users can also request the deletion of their Personal Data by contacting Palkkaus.fi customer service.

## 6 Right to transfer data

The User has the right to transfer their Personal Data provided to Palkkaus.fi from one controller to another, provided that the data is provided to Palkkaus.fi by the User themselves, and Palkkaus.fi processes the Personal Data in accordance with the personal data processing agreement the person logged in becoming a User of the Service. The data will be provided to the User in a machine-readable file within a reasonable period of time through a secure channel.

## 7 Data retention

Palkkaus.fi processes the Personal Data of data subjects for the duration of the customer relationship.

Information collected by Palkkaus.fi that cannot be proven to be provided by the User in the Service (as described in sections 1.2 and 1.3) will always be deleted as soon as possible after its discovery, unless otherwise required by law.

However, customer identifying information is always stored and deleted in accordance with the Act on Preventing Money Laundering and Terrorist Financing (444/2017).

## 8 Security measures

Personal Data is only stored on secure servers. Access to the data of Users is restricted by access rights, and is only granted to persons who need the data in order to carry out their duties. Persons processing Personal Data are bound by the obligation of confidentiality.

Data security processes and practices are designed to prevent information from being lost, misused, destroyed or falling into the hands of unauthorised parties. Palkkaus.fi maintains the following technical security measures:

- The User connects to the Service using legally valid strong electronic authentication.
- User passwords are not stored in plain language and are not logged.
- The Service does not set a password for the User. At the User's request, the password will be set to a random strong password, which the User will have to change at the next login.
- Log data is collected about logins to the Service.
- Subcontractors are also required to ensure appropriate protection of the Personal Data processed.
- Manual material is stored in locked rooms.

To ensure the security of data processing, Palkkaus.fi regularly tests, examines and evaluates the effectiveness of technical and organisational measures.

More information about the technical implementation and security of the Service can be accessed on our privacy page via our website.

## 9 Contacting Palkkaus.fi about data protection

Questions about Palkkaus.fi's privacy policy can be addressed to Palkkaus.fi via Palkkaus.fi customer service by sending an email to [aspa@palkkaus.fi](mailto:aspa@palkkaus.fi).