

Privacy notice of LocalTapiola Group's common customer data file

This privacy notice of LocalTapiola Group's common customer data file describes what personal data are saved in the data file, the purposes for which the data are used, how the data are protected, and where the data subjects can get more information with regard to their personal data.

The LocalTapiola Group companies operate as joint controllers in respect of the personal data saved in the customer data file. The parties have agreed mutual procedures to ensure the implementation of data subjects' rights and to comply with the obligations set out in the Regulation.

1. Joint controllers

LocalTapiola Group
Revontulenkujä 1
02010 LÄHITAPIOLA

The joint controllers are the following companies part of LocalTapiola Group:

1. LocalTapiola General Mutual Insurance Company
2. LocalTapiola Mutual Life Insurance Company
3. LocalTapiola Asset Management Ltd
4. Seligson & Co Fund Management Company Plc
5. LocalTapiola Real Estate Asset Management Ltd
6. LocalTapiola regional companies (19 companies)*

For more information on LocalTapiola Group, visit LocalTapiola's website www.lahitapiola.fi.

2. Data Protection Officer's contact details

For more information on personal data and the processing of personal data, contact LocalTapiola Group's Data Protection Officer. In addition, LocalTapiola's website www.lahitapiola.fi provides information on the principles governing the processing of personal data at LocalTapiola Group as a whole.

By email: tietosuoja@lahitapiola.fi

By mail: LocalTapiola Group
Data protection / Data Protection Officer
Revontulenkujä 1
02010 LÄHITAPIOLA

3. Purposes of and legal grounds for the processing of personal data

LocalTapiola Group maintains a common customer data file in order to be able to provide service to its customers, to develop its services and products and to fulfil its statutory requirements.

Data subjects' personal data are processed in accordance with the EU's General Data Protection Regulation, Finnish data protection legislation, insurance legislation, investment service legislation and all other applicable provisions.

Purposes of the processing

The data in the customer data file are used for the following purposes:

- LocalTapiola Group's customer service, customer communications and management of customer relationships;
- production and development of services and products provided by LocalTapiola Group or a firm belonging to the same economic interest grouping;
- advertising and marketing, and the targeting of advertising and marketing, including direct marketing and online marketing, of services and products provided by LocalTapiola Group or a firm belonging to the same economic interest grouping, as well as for opinion and market polls;
- use monitoring and analysis of, and compilation of statistics on the use of, services and products provided by LocalTapiola Group or a firm belonging to the same economic interest grouping;
- ensuring the security of services, and investigation of abuses.
- discharge of the statutory obligations and those laid down in the rules and instructions issued by the relevant authorities.

Automated decision-making, and profiling

The processing of personal data may involve automated decision-making. Automated decision-making is employed, for example, when purchasing insurance policies online as well as in the examination of claims, where one of its purposes is to promote the provision of services. Users are specifically made aware of automated decision-making in the context of every service that utilises it, and consent to utilise it is requested where necessary. The data subjects enjoy the right to appeal any decision made on an automated basis and to request that an employee re-process the matter.

The processing of personal data may also involve profiling. Profiling is employed in tasks such as claims handling, to create a risk assessment, and in the targeting of marketing efforts in order for the products and services marketed to meet customers' needs.

For general information on automated decision-making and profiling, visit LocalTapiola's website www.lahitapiola.fi/henkilotietojenkasittely.

Customer due diligence, and prevention of money laundering and countering of terrorist financing

The customer due diligence data and the data subjects' other personal data may be used to prevent, counter, expose and investigate money laundering and terrorist financing, and to initiate investigations of money laundering and terrorist financing and of criminal offences committed to obtain any property or proceeds of crime that are subject to money laundering or terrorist financing.

The data subject's personal data may be used for investigating whether any of the sanctions or asset freeze decisions with which the controller complies apply to the data subject.

LocalTapiola Group collects tax liability data on its savings and investment customers and discloses them to the tax authority, which passes them on to other authorities.

Legal grounds for the processing

In the main, LocalTapiola Group processes the data subjects' personal data on the basis of the relevant contractual relationship and the measures that precede the conclusion of a contract.

Personal data may also be processed on the basis of:

- a data subject's consent, such as consent to obtain records of treatment from a hospital or a clinic, or consent to execute electronic direct marketing;
- the controller's statutory obligations, such as the obligations laid down in tax legislation and in the Insurance Companies Act;

- the controller's legitimate interests, such as use of data for direct marketing and for the targeting of direct marketing, including online marketing, and to combat abuse and fraud committed against insurers. Usually, the controller's legitimate interest is founded on a customer relationship between the controller and a data subject, or a comparable relationship, such as the payment of compensation to a victim who is external to the customer relationship.

The processing of a data subject's health information is based on the law or the data subject's consent.

4. Registered groups of persons

1. Insurance customers
2. Claims customers
3. Fund customers
4. Investor customers
5. Loan customers of the insurance companies
6. Tenants
7. Persons linked to a customer, such as those belonging to the same household, or the beneficial owners of companies
8. Potential customers
9. Company-specific persons subject to registration under the statutory obligations.

5. Personal data stored in the data file

- a) The customer data, including:
 - contact details, such as name, address, telephone numbers and email address
 - identification data, such as personal identity code, date of birth and nationality
 - data required by the law to determine the financial position and any political influence
 - any customer interests, such as family interest, guardian interest and representative interest
 - death date, if any
 - banking details, account number
 - online service registration data
 - taxation data for Finland and foreign countries (only those who have completed the FATCA data)
 - data on the memberships that have an impact on benefits and discounts, such as a membership number
 - consents and prohibitions relating to the processing of customer data, such as a non-disclosure for personal safety reasons ('turvakielto').

- b) The customer relationship data, including:
 - general data, such as the company with which the customer has a customer relationship, the insurances that a customer has, and any S-Bank membership
 - customer-specific data, such as the contacts made by the customer, and documentation of the customer-related tasks
 - indication of the contracts that relate to management of the customer relationship
 - data on benefits
 - data on S Group loyalty customer membership and related payments and bonuses.
- c) The marketing data, including:
 - consent to email and mobile phone marketing
 - direct marketing opt-outs.
- d) The customer communications data, including:
 - customer letters and newsletters
 - chat conversations
 - telephone recordings
 - online messages.

6. Regular sources of data, and disclosure of personal data

In the main, all data are obtained directly from the data subjects, parties authorised by the data subjects, registers maintained by the authorities (such as Traficom and the Digital and Population Data Services Agency), and the credit register.

Personal data may be disclosed to LocalTapiola Group companies not covered by the common customer data file and to any firm belonging to the same economic interest grouping insofar as permitted under the law.

Personal data are disclosed to parties external to LocalTapiola Group only with the data subject's consent or when there is a specific legal ground or some other legitimate purpose for the disclosure of data. On the basis of the law, personal data may be disclosed to the relevant authorities, including the Financial Supervisory Authority and the tax authorities. In addition, personal data may be disclosed to partners that are used for producing or providing services (for example, to S Group to accrue S Bonus). Personal data may also be disclosed for marketing purposes to advertising partners in order to target advertising and to implement targeted online marketing. Recipients may act as joint controllers together with LocalTapiola Group companies or as independent controllers, and partners may act also as processors of personal data on behalf of LocalTapiola Group companies.

For more information about the targeting of advertising and about targeted online marketing, visit the LocalTapiola website www.lahitapiola.fi/henkilotietojenkasittely.

Data on the claims filed with LocalTapiola Group are saved into the claims register maintained jointly by insurers, in which connection a check is made as to what claims have been submitted to the other insurers. Based on the data in the claims register, insurers may also exchange more detailed claim data with each other. The data in the claims register are used in claims handling to combat abuse committed against insurers.

Data on the criminal offences and suspected criminal offences committed against LocalTapiola Group's insurance business are saved into the fraudulent claims register maintained jointly by insurers, and a check is made of the data subject's data that are saved in the register. Data in the fraudulent claims register are used in claims handling and in the insurance process to combat crime committed against insurers.

7. Transfer of personal data outside the European Union or the European Economic Area

Personal data may be transferred outside the EU or the EEA insofar as data protection legislation permits.

Some external service providers or other recipients of personal data may be located, or they may process personal data, outside the EU or the EEA. LocalTapiola Group employs the necessary transfer mechanisms available in legislation to ensure that the level of the protection of personal data is not compromised in cases where they are transferred outside the EU or the EEA. Such transfer mechanisms include the European Commission's equivalence decisions and the conclusion of standard clauses with any recipient of data located outside the EU or the EEA.

8. Retention period of personal data

LocalTapiola Group determines the retention periods of personal data with due consideration of the requirements set in the applicable legislation and the smooth operation of business, including claims handling and the insurance process. The insurance business is long-term by nature, which is why the retention periods of personal data are extensive. Often the personal data of a data subject must be kept stored even after the customer relationship has ended. The purpose of the retention periods is to safeguard the data subjects' and LocalTapiola's rights.

The retention periods of data subjects' personal data vary according to the type of transactions they conduct or have conducted. For instance, with statutory motor liability insurance and workers' compensation insurance, insurance and claims data must, as a general rule, be kept for a period of 100 years from the date of termination of insurance or from the last day on which a claim is examined. With voluntary insurance lines, insurance and claims data are kept for at least 10 years from the date of termination of insurance or from the last day on which a claim is examined. Offer data are stored for a minimum period of 18 months from the day of submission of the offer.

9. Principles for the protection of personal data

In the protection of personal data, we use the necessary technical and organisational means that are aligned with best practices, including:

- limitation and management of access rights
- registration of personal data processing operations
- training of and provision of instructions to personnel
- various encryption and protection techniques
- monitoring of cyber security
- firewalls, and differentiation of environments
- ensuring the security of facilities
- access control.

LocalTapiola Group also requires that the subcontractors it uses ensure the appropriate protection of the personal data processed, and the activity of subcontractors is inspected and audited where necessary.

10. Data subject's rights

Withdrawal of consent

Where the processing of personal data is based on a data subject's consent, the data subject has the right to withdraw their consent to process their data. Such withdrawal has no impact on any processing that has taken place before the withdrawal.

Right of access

A data subject has the right to obtain confirmation as to whether or not their personal data are being processed, as well as enjoying the right to be given a copy of their data.

Right to rectification

A data subject has the right to demand rectification of all inaccurate or incomplete data.

Right of erasure

A data subject has the right to request erasure of their personal data.

Other rights

A data subject has the right to object to the processing of their data for the purposes of direct marketing and direct marketing-related profiling. Under some circumstances, a data subject has the right to request restriction of the processing of their personal data, or to otherwise object to the processing of their personal data. In addition, the data subjects may request the transfer, in a machine-readable format, of the data they themselves have submitted, if technically feasible.

The data subjects may exercise their rights using the contact details provided under Section 2 or some other contact details communicated for this purpose. The data subject may also submit a request to exercise their rights to any LocalTapiola Group company acting as a joint controller.

Where a data subject finds that the processing of their personal data is not lawful, they may lodge a complaint with the relevant supervisory authority.

*The regional companies:

LocalTapiola Etelä Mutual Insurance Company

LocalTapiola Etelä-Pohjanmaa Mutual Insurance Company

LocalTapiola Etelärannikko Mutual Insurance Company - LokalTapiola Sydkusten Ömsesidigt Försäkringsbolag

LocalTapiola Itä Mutual Insurance Company

LocalTapiola Kaakkois-Suomi Mutual Insurance Company

LocalTapiola Kainuu-Koillismaa Mutual Insurance Company

LocalTapiola Keski-Suomi Mutual Insurance Company

LocalTapiola Lappi Mutual Insurance Company

LocalTapiola Loimi-Häme Mutual Insurance Company

LocalTapiola Länsi-Suomi Mutual Insurance Company

LocalTapiola Pirkanmaa Mutual Insurance Company

LocalTapiola Pohjanmaa Mutual Insurance Company - LokalTapiola Österbotten Ömsesidigt Försäkringsbolag

LocalTapiola Pohjoinen Mutual Insurance
Company

LocalTapiola Pääkaupunkiseutu Mutual
Insurance Company - LokalTapiola
Huvudstadsregionen Ömsesidigt
Försäkringsbolag

LocalTapiola Savo Mutual Insurance Company

LocalTapiola Savo-Karjala Mutual Insurance
Company

LocalTapiola Uusimaa Mutual Insurance
Company - LokalTapiola Nyland Ömsesidigt
Försäkringsbolag

LocalTapiola Varsinais-Suomi Mutual Insurance
Company

LocalTapiola Vellamo Mutual Insurance
Company