

Privacy notice of LocalTapiola Mutual Life Insurance Company's insurance and claims data file

This privacy notice describes what data are saved in LocalTapiola Life's insurance and claims 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.

1. Controller

LocalTapiola Mutual Life Insurance Company
Revontulenkujä 1
02010 LÄHITAPIOLA

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
Legal & Compliance / Data Protection Officer
Revontulenkujä 1
02010 LÄHITAPIOLA

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

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

Purposes of the processing

Personal data are used for the examination of claims on the basis of LocalTapiola Life's insurance business and LocalTapiola Life's insurance contracts. The data are needed for the management of insurances and claims, for customer service and customer communications, and to fulfil the necessary regulatory requirements.

Additionally, the data are also used for the marketing, use monitoring and analysis of, and to compile statistics on the use of, LocalTapiola Group's services and products, as well as for the development of products and services, for ensuring the security of the services, and for the investigation of abuses.

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 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.

A data subject's personal data may be used to investigate whether any of the international sanctions with which the controller complies apply to the data subject.

Legal grounds for the processing

In the main, LocalTapiola 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, consent to use information about a trade union membership, 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 the data for direct marketing, provided that the data subject is aware of this and has not prohibited this. 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.

A data subject's health information is processed on the basis of the law or the data subject's consent.

4. Registered groups of persons

Insurance customers and claims customers, including:

- policyholders
- insureds
- other parties relating to insurances and the insurance process, such as beneficiaries, managers and payers
- other parties relating to claims and the claim process.

5. Personal data stored in the data file

The insurance data, including:

- The basic insurance contract data, including:
 - contract number
 - contract start and end dates
 - reason for contract termination
 - reinsurance data
- The data on the premiums, including:
 - premium period
 - premiums, the mode of premium payment, and the recovery data
 - data on the financial institution, and the payment transfer data

- The life insurance and pension insurance data, including:
 - basic contract data
 - data relating to the outcome of insurance applications
 - health declaration data
 - data on the insured's health and lifestyle
 - insurance cover data
 - exclusions
 - professional data affecting risk
 - trade union data
 - beneficiary orders
 - share of the premiums
 - fund data, and fund development data
 - taxation data
 - indexation, and indexation clauses
 - employment relationship data
 - data on wages and salaries
 - pledge data
 - insurance policy loan data
 - insurance cover amendment data
 - other data on the insurance needs mapping
- The data on endowment and unit-linked insurance policies (including capital redemption contracts), including:
 - data on the assessment of customer saving or other needs
 - type and line of insurance
 - type and class of investment
 - data on funds, investment options and fund development
 - pledge data
 - taxation data
 - employment relationship data
 - beneficiary orders and savings recipient orders
 - insurance amendment data and savings development data
- The data on the documentation relating to the processing of insurance contracts, including:
 - insurance applications and related appendices
 - health-related medical statements and information.

The claim-related data, including:

- The data on insured events, including:
 - insured event number
 - insured event date
 - disease classification data
 - event data
 - insurance contract data

- insurance cover data
- data on insurance savings and investment options
- The data on the insured event customer, including:
 - taxation data used to withhold tax
- The claim settlement data, including:
 - data on claim acceptance or denial
 - data on any preliminary decision and denial
- The compensation payment data, including:
 - amounts of compensation payments
 - amounts of pensions
 - amounts of savings payments
 - amounts of tax withheld
 - payment dates
- The subrogation data, including:
 - data on the recovery of payments made
 - repayer data
- The data on the documentation relating to the processing of events, including:
 - claim applications and supporting documents
 - notifications relating to the payment of savings and pensions, and supporting documents
 - health-related medical statements.

The complaint and appeal data, including:

- unique complaint identification data
- unique identification data of decisions by appeal bodies
- documents and other materials relating to complaints or appeals.

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 public authorities, and the credit register.

Personal data may be disclosed within LocalTapiola Group and to a 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 whenever there is a specific legal ground for the disclosure of data.

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. Life insurance data and claims data are stored for a minimum period of 10 years from policy expiration. Life insurance offer data are stored for a minimum period of 3 years 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.

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.