

Construction site register privacy policy

1. Controller and contact information

Controller:
Nordic Electro Power Oy
(2798030-1)
Silmukskatie 6, 65100 Vaasa

Data protection contact person:
Mika Alatalo
p. 050-3615496
email:: mika.alatalo@nepower.fi

2. Purpose and legal basis for processing

The construction site register contains personal data of employees, independent contractors, and contact persons of subcontractors working at the construction site.

The purposes of processing personal data are:

- Implementation of the contract and supervision of work performance
- Ensuring safety at the construction site
- Fulfilling statutory reporting obligations (e.g., taxation, Contractor's Liability Act, Occupational Safety and Health Act)

The processing of data is based on statutory obligations (including the Act on Assessment Procedure 1558/1995, Occupational Safety and Health Act 738/2002, Government Decree on the Safety of Construction Work 205/2009, Contractor's Liability Act 1233/2006) and the controller's legitimate interest (e.g., managing access permits and ensuring site safety).

3. Data we process

The register may include the following data:

- Basic information: name, date of birth or personal ID, postal address, email, phone number, tax number
- Employment details: start and end dates of work, employer's name and business ID, site-specific inductions, job title, and work location
- Access control data: access rights group, ID card number, access logs
- Information on foreign workers: residence permit, nationality, copy of passport or ID card
- Contractor liability information: applicable collective agreement, certificates on pension and social security contributions
- Other taxation-related information: identification data, contact person details, site location, and employment type

4. Sources of data

Data is obtained from the data subjects themselves, contractors, and public authorities. Access log data is collected automatically via time-tracking or access control systems; manual registration may also be used if needed.

5. Recipients of data

Data may be disclosed to authorities (e.g., Tax Administration, Occupational Safety and Health Authority, Employment Office) and other parties as required by law.

Data may also be shared with partners in connection with contracts or legal obligations. Subcontractors such as IT service providers may process personal data on behalf of the controller under documented instructions.

6. Transfer of data outside the EU/EEA

Data is stored within the EU/EEA area. If data is processed outside the EU/EEA, appropriate safeguards such as EU Standard Contractual Clauses will be applied.

7. Data security

Technical measures: firewalls, antivirus protection, encryption, automatic session locking, access control management, logging, backup and recovery systems.

Organisational measures: staff data protection training, internal policies, confidentiality agreements, risk management plans, data protection impact assessments, and regular audits.

8. Data retention

Personal data is retained for as long as necessary to fulfill the purpose of processing or to comply with legal obligations:

- Taxation and occupational safety data: 6 years after the year in which the construction site was completed
- Contractor liability data: at least 2 years after the related work or contract has ended

9. Rights of the data subject

The data subject has the right to:

- Obtain information about the processing of their data
- Access their own data
- Request correction of incorrect or outdated information
- Object to data processing for a personal reason when based on legitimate interest
- File a complaint with the Office of the Data Protection Ombudsman (www.tietosuoja.fi)

10. Contact and changes to this policy

All requests and questions regarding the construction site register should be directed to the contact details mentioned in section 1.

Nordic Electro Power Oy may update this privacy policy as necessary and will inform about significant changes appropriately.