

Employee register privacy policy

1. Controller and contact information

Controller: Nordic Electro Power Oy (2798030-1) Silmukkatie 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 data contained in the employee register is processed for the following purposes:

- Payroll and employment administration
- Occupational health care arrangements
- Issuing employee ID cards and access permits
- Verifying employee qualifications (training, work experience)
- Fulfilling statutory obligations

The processing of personal data is based on the EU General Data Protection Regulation (GDPR, EU 2016/679) and national legislation, including the Data Protection Act (1050/2018), Employment Contracts Act (55/2001), Working Hours Act (872/2019), Annual Holidays Act (162/2005), Occupational Health Care Act (1383/2001), Accounting Act (1336/1997), Act on the Protection of Privacy in Working Life (759/2004), and the Act on Tax Numbers and the Construction Sector Tax Number Register (473/2021).

Vehicle location data may be processed based on legitimate interest for the prevention of theft and crime. Such data is not used for monitoring or profiling employees.

3. Data we process

The register may include the following personal data:

- Name, personal identity number, and contact details (address, phone number, email)
- Bank account number and salary information
- Tax information, sick leave data, vacation details, and possible garnishment information
- Education and work experience
- Vehicle tracking data (for crime prevention only)

4. Sources of Data



Data is obtained from the data subject during the employment relationship and, where necessary, from public authorities.

5. Recipients of data

Personal data may be disclosed to authorities or other parties only to the extent required by law. More detailed information on recipients is available upon request from the data protection contact person.

6. Transfer of data outside the EU/EEA

Personal data is not transferred outside the EU or EEA.

7. Data security

Data protection principles and practices comply with the Data Protection Act (1050/2018).

Technical safeguards: firewalls, antivirus protection, encryption, automatic session locking, access rights management, logging, as well as regular backups and recovery systems.

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

8. Data retention

Employee register data is retained for as long as required by labour, occupational health, accounting, and other applicable legislation. Data will be deleted when retention is no longer necessary.

9. Rights of the data subject

The data subject has the right to:

- Obtain information on the processing of their personal data
- Access their own personal data by submitting a written request to the data protection contact person
- Request the correction of inaccurate or outdated data
- File a complaint with the Office of the Data Protection Ombudsman (<u>www.tietosuoja.fi</u>) if they believe that the processing of their data violates data protection regulations

10. Contact and changes to this policy

All requests and questions concerning the employee register should be directed to the contact information provided in section 1.

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