

# Privacy notice

Valtti card register

(Last updated on 16 December 2020)

## 1. Controller and contact person of the register

Vastuu Group Oy (Business ID 2327327-1)  
Tarvonsalmenkatu 17 B  
02600 Espoo, Finland

Data Protection Officer's contact details:

Email            dpo@vastuugroup.fi

Regular mail    Vastuu Group Oy  
Data Protection Officer  
Tarvonsalmenkatu 17 B  
02600 Espoo, Finland

## 2. Data subjects

Data subjects are the holders of Valtti smart cards granted by Vastuu Group Oy (the "Supplier"). Cardholders are the employees, managers, trainees (not working on an employment contract), or volunteer workers of Supplier's customer.

## 3. Basis for and purpose of personal data processing

The legal basis for personal data processing is the legitimate interests of the controller.

The Valtti card is a photographic identification card for use at building sites, in accordance with the Occupational Safety and Health Act. There can be two cards in the card package: The Valtti smartcard and the photographic personal identity card required on worksites. The Valtti smartcard relies on RFID technology.

Information printed on the smart card has been saved in the Supplier's electronic Valtti card database, from where third parties that have been granted access rights to the data can search for the cardholder's personal data for purposes specified in this privacy notice.

## 4. Which personal data is collected and from what sources?

We collect the following information from the employer company acting as Supplier's customer:

- first name, last name, tax number, date of birth, and photograph of the cardholder
- name and business ID of the employer

In connection to creating the Valtti card, we will add the following data into the register:

- name and bar code of the Valtti card
- chip ID
- last valid date of the Valtti card
- photograph of the card
- status and any modification data of the card

We will collect the following data in our customer register and service logs when the card is ordered:

- name of the person who submitted the order, date and method of identification
- completed and cancelled orders and the date of completion or cancellation
- status of the order
- delivery address

#### 5. Regular disclosure and transfer of personal data

Customers using Vastuu Group Oy's services can search for and save in their own data systems personal data of cardholders when the cardholder works or is expected to start working at the customer's building site or other work site. In connection to data searches, qualification data saved in the Taito Competence Register about the cardholder and other personal data reported by the employer in the Ilmoita service can be linked to the data contained in the Valtti card register, to the extent that the customer has the legal right to process such additional data.

The cardholder's personal data can be searched for and processed only for the following purposes:

- preparation of the employee list at the construction site, pursuant to section 52b of the Occupational Safety Act (738/2002)
- verification of the validity of the picture ID required at the construction site, pursuant to section 52b of the Occupational Safety Act (738/2002)
- performance of employee inductions at the construction site as set out in the Occupational Safety Act (738/2002) and taking care of all other required activities for ensuring and promoting safety at work;
- preparation of monthly employee reports for the Finnish Tax Administration (section 15 b of the Tax Procedure Act (1558/1995))
- compliance against other legal or contractual obligations;
- access control at the construction site or other work site;
- verification of professional competences of a person being inducted at the construction site or other work site;
- verification of professional competences required for a work task;
- ensuring compliance against occupational safety regulations;
- direction of the work at the construction site or work site;
- ensuring the contracting party's compliance against contractual terms or applicable quality, operative or similar standards;
- ensuring that contractors or independent workers operating at a partner's building site or other work site comply with the contract, and
- upon data subject's explicit consent for other purposes.

The transfer of personal data to the personal data file of another controller is completed using interfaces provided by the Supplier so that the transfer of employees' personal data requires that the employee's Valtti card ID has been checked or that the contractual relationship between the employer/data subject and the other controller and purpose of data processing has been recognised in some other manner.

We can disclose data contained in the Valtti card register to the authorities based on the mandatory requirement of a competent authority, or when we consider the inquiry of the authority to be justified in order to investigate suspected misuse of our services.

We can collect and disclose to third parties numbers of issued and valid Valtti cards per company, group of companies, industry sectors or using other segments as a grouping criteria. Individual cardholders cannot be identified from such numbers.

In the production of the Valtti card service, we can use subcontractors located within the European Economic Area, and it can also transfer personal data to such subcontractors for producing the service.

## 6. Transfers outside the EU and EEA

As a rule, personal data is not transferred outside the EU or the European Economic Area.

## 7. Storage period of personal data

Information on issued Valtti cards is stored in the Valtti card register for ten years from the end of the calendar year during which the validity of the card expires, or for as long as the site register or some other register of Vastuu Group's customer has references to the Valtti card concerned.

Numbers of expired Valtti cards (without personal data) are saved permanently on the expired card revocation list.

## 8. Rights of data subjects

As a data subject, you have the right to inspect the personal data concerning yourself and demand that any incorrect data be corrected or deleted. However, we can, within the limits of law, restrict your right to access data that contains the personal data of others, is a business secret of ours or our customer, or is related to the safety features of the service.

You have the right to request that your personal data be deleted in situations specified in the general data protection regulation, if:

- you cancel your previous consent and there is no other legal basis for processing the data concerned besides your consent
- you object to the processing of your personal data, and there is no legal basis for continuing the processing
- processing the data is illegal
- you are under 18 and your personal data was collected in connection with providing information society services.

In situations specified in the general data protection regulation, you have the right to object to the processing of your data or to request that the processing of your data is restricted. If you consider the processing of your personal data to be illegal, you can submit a complaint on the processing to a competent authority.

## 9. Data security

The right to use the register is restricted to appointed persons only, who need the information concerned in their work tasks. Each user has his/her own user name and password. Personal data is stored in databases and data systems located within the European Economic Area that have the appropriate technical and organisational measures in place to protect the personal data against misuse and disclosure.

## 10. Contacts

If you have questions regarding this privacy notice or you wish to exercise your rights, please contact Supplier's Data Protection Officer by using the above email or postal address.

## 11. Changes

We can make changes to this privacy notice from time to time without a separate notice. Any changes made are listed in the "last update" section at the beginning of this privacy notice.