

Privacy Notice for Employees

At Hanken, the protection of your personal data and privacy, as well as the responsible processing of your data, is of utmost priority.

This page describes the processing of employees' personal data. A general description of personal data processing at Hanken can be found <u>here</u>.

1. Data Controller and Contact Information

Data Controller: Hanken School of Economics (hereafter: Hanken) Contact Information of the Data Controller: P.O. Box 479, 00101 Helsinki, Phone: +358 (0)29 431 331

Contact person for data processing inquiries: Jenny Elander, jenny.elander@hanken.fi Contact Information for DPO: dpo@hanken.fi

2. Why Does Hanken Process Your Personal Data?

Hanken processes your personal data for the following purposes:

- Management of employment relationships, including onboarding, and tracking of working time and absence
- Personnel planning
- Payment of salaries, fees, and compensations
- Management, monitoring, and development of work well-being
- Statistics and reporting
- Management of access rights
- Knowledge management and competence development
- Compliance with obligations under the Occupational Safety and Health Act
- Management of occupational accident insurance
- Cooperation purposes

3. What is the Legal Basis for Hanken's Processing of Your Personal Data?

The processing of personal data is primarily based on Articles 6.1(b) (performance of contract), 6.1(e) (public interest and exercise of official authority), 6.1(c) (legal obligation), and 6.1(f) (legitimate interest) of the GDPR. In some cases, the legal basis may be Article 6.1(a) (employees' consent) of the GDPR.

The processing of special categories of personal data is based on consent (Article 9.2(a) of the GDPR) or the implementation of employment law provisions (Article 9.2(b) of the GDPR).

Hanken fulfills its statutory employer responsibilities in carrying out personnel administration tasks in accordance with applicable provisions of the Employment Contracts Act, the Co-operation Act, the Occupational Safety and Health Act, the Occupational Health Care Act, as well as the collective agreement. Key legislation and regulations include:

- The Employment Contracts Act (55/2001)
- The Collective Agreements Act (436/1946)
- The Co-operation Act (1333/2021)







- The Occupational Safety and Health Act (738/2002)
- the EU General Data Protection Regulation (2016/679)
- The Finnish Data Protection Act (1050/2018)
- The Non-Discrimination Act (1325/2014)

4. What Personal Data is Collected and Processed at Hanken?

Hanken only processes personal data that is necessary for the specific purpose for which it is collected. The personal data collected includes:

- Identifying information (name, personal identity code or date of birth)
- Background information (e.g. education, previous work experience, secondary occupations, nationality, native language, and residence permit details)
- Contact information (address, phone number, email address, postal address, and emergency contact details)
- Title, work location, unit, and supervisor
- Employment start and end dates, information on working hours, records of development reviews, absence information, reason for termination of employment, and disciplinary actions *
- Payment and salary information, bank account number, tax information, fees, and grants *
- Information on individual arrangements *
- Special dietary requirements *

Your personal data is only processed by individuals employed by Hanken or working on its behalf, who have the right to process the data. Only those for whom the processing is necessary for their work responsibilities will process the data.

5. How Does Hanken Collect Your Personal Data?

Data is collected from the following sources:

- Directly from you
- The Finnish Tax Administration
- Keva and Varma
- The Social Insurance Institution of Finland (Kela)

6. To Whom May Hanken Disclose Your Personal Data?

Hanken may disclose your personal data to the following recipients when required:

- Human Resources Management System
- The Finnish Tax Administration
- Pension insurance companies
- The Social Insurance Institution of Finland (Kela)
- Insurance companies
- Occupational health care providers
- Accounting and payroll service providers
- The Ministry of Education and Culture
- The Finnish Immigration Service
- External funders, such as Business Finland, the EU, and the Research Council of Finland

^{*}May involve processing of special categories of personal data.

- External evaluation organizations and groups
- External experts conducting career recruitment

7. Transfer of your Personal Data to Third Countries

External experts conducting career recruitment, as well as external evaluation organizations and groups, may process your personal data outside the EU/EEA. In such cases, appropriate safeguards in accordance with the GDPR are applied. In other cases, the processing takes place within the EU/EEA.

8. How Long Is Your Personal Data Stored?

The retention period for your personal data is determined according to applicable legislation and Hanken's information management plan. Data is retained only as long as necessary for the purpose for which it was collected or as required by national laws concerning publicity, information management, access to information, and archiving. For more detailed information, please contact the person mentioned above.

9. Your rights under the GDPR

9.1. Right of Access and Right to Rectification of Personal Data

In accordance with the GDPR, you have the right to know what personal data Hanken processes about you. You also have the right to have inaccurate personal data rectified, without undue delay. If your personal data is incomplete, you have the right to have data completed, with regards to the purpose of the processing.

9.2. Right to Erasure and Withdrawal of Consent

You have the right to request the erasure of your personal data if it is no longer needed for the purpose for which it was collected or processed. However, this right does not apply if the processing is necessary for:

- Compliance with a legal obligation,
- The performance of a task carried out in the public interest or in the exercise of official authority vested in the controller,
- The establishment, exercise, or defence of legal claims, or
- Exercising the right of freedom of expression and information.

If the processing of your personal data is based on consent, you have the right to withdraw your consent. If there is no longer a legal basis for processing after withdrawal, your personal data will be deleted.

9.3. Right to Restriction of Processing

You have the right to request the restriction of the processing of your personal data in certain situations. This applies if:

- You contest the accuracy of the personal data during the period required to verify the data.
- The processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of its use, or

• Hanken no longer needs the personal data for the original purpose, but you need them to establish, exercise, or defend legal claims.

9.4. Right to Data Portability

You have the right to receive your personal data that you have provided to Hanken or to have your personal data transmitted to another controller in certain cases.

9.5. Right to Object to Processing

You have the right to object to the processing of your personal data if the processing is based on a public or legitimate interest.

9.6. Right Not to be Subject to Automated Decision-making

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

10. Exercising Your Rights

To exercise your rights under the GDPR, you may contact Hanken's Data Protection Officer by email at: dpo@hanken.fi.

If you believe that the processing of your personal data violates the provisions of the GDPR, you have the right to file a complaint with the Office of the Data Protection Ombudsman.

11. Right to be Informed of a Personal Data Breach

If a personal data breach occurs that is likely to result in a high risk to your rights and freedoms, Hanken, as the data controller, is obliged to inform you of the incident without undue delay.