

Membership and customer register privacy statement AMENDED 1.9.2022

1. Data controller and contact information	Service Union United PAM (PAM) Siltasaarencatu 18 A, P.O. Box 54, 00530 Helsinki pam(at)pam.fi Contact information of data protection officer: Data Protection Officer Service Union United PAM P.O. Box 54, 00530 Helsinki tietosuojavastaava(at)pam.fi
2. Name of the personal register	Membership and customer register
3. Criteria for processing right	Legal basis for PAM's personal data processing activities in the membership and customer register: • Management of membership: Contract (becoming a member), consent • Legal services, such as employment disputes: contract (starting a case), Consent • Marketing: Legitimate interest • Training: Contract (enrolment), Consent • Organising activity: Contract (becoming a member, accepting an organising or representative position) • Organising activity (customer and member relationship management): Consent
4. Purposes	The purpose of PAM is to improve the economic, social and legal status and quality of life of employees, students, self-employed persons as well as unemployed persons in the service sector and related sectors, in the ways described in Section 2 of PAM's Statutes. In its activities, PAM processes the personal data of its members and customers for the following purposes. Managing membership and customer relations and organising activities: • Management of membership and customer relations, customer service and advice, and processing feedback. • Operational management, control, analysis and development. • Communication, campaigns and marketing. Planning and implementation of activities and services: • Providing and developing activities and services, such as • Employment security services • Training • Legal services • Providing membership benefits



	• Identification of members and customers, access rights management and access control. • Operational supervision, quality assurance and resolving errors. • Verification and analysis of service transactions. • Personalisation of services • Research, analysis, statistics and reporting on activities and services. Data security: • Ensuring the availability, integrity, reliability and continuity of services and data. • Risk management and prevention, detection, resolution and follow-up of irregularities and problems and actions resulting from these. • Ensuring legal certainty and fulfilling obligations under the law and public authorities' regulations.
5. Data content	For those registered in the membership and customer register, the following categories of personal data are processed: Members: • Union members Non-members • Former members • Representatives and contact persons of employers of union members • Persons from other stakeholders and partners • Other service users (such as interest representation cases and training) In carrying out the tasks and purposes of PAM as described above, the following types of data are processed: • Identification data: membership number, personal identity code • Contact information • Membership information, such as type of membership, union branch, workplace, membership fees • Details of union representative positions • Service transaction data, such as training, legal services • Call record: start date, start time, call duration, call handler's extension and name, caller's number or number called, number in series to which call made, call direction, incoming/outgoing/internal
6. Use of cookies	PAM uses cookies in its online services to provide services and to facilitate use of the services. Cookies and data collected from the online service are also used to analyse and develop the use of the online service and services, to improve usability and ensure data security and for marketing purposes.. Users can block the use of cookies in their browser settings. However, cookies are necessary for the functionality of online services, so PAM does not guarantee the functionality of all services if cookie functionality is not enabled.

7. Regular data sources	Personal data in the membership and customer register is obtained primarily from the data subject him/herself. Information on membership fees is obtained from members' employers. For members who are members of the PAM Union and the PAM Unemployment Fund, the membership number, personal identity code, contact details, membership period and membership fee information are processed and received between the parties for the purpose of providing benefits defined in law to members. PAM maintains data quality by updating personal data from information services such as the Posti address information service.
8. Recipients or groups of recipients	For members who are members of the PAM Union and the PAM Unemployment Fund, the membership number, personal identity code, contact details, membership period and membership fee information are processed and transmitted between the parties for the purpose of providing benefits to members as defined in law. Information on their own members' membership is disclosed to the union branches. For member benefit providers, member information is disclosed to insurance companies for membership verification and marketing of member benefits, unless the member has opted out of direct marketing. Personal data is not transferred or disclosed outside the EU or EEA areas.
9. Automatic decision-making	No automated decisions within the meaning of the EU General Data Protection Regulation are made in the activities of PAM Union.
10. Right of verification	Data subjects can verify what information about them is stored in PAM's membership and customer register. In their verification request, data subjects must provide sufficient identification information about themselves. Verification requests must be submitted signed electronically or in writing to PAM Union's data protection officer.
11. Portability of personal data	Data subjects may request from PAM, as a data file, personal data on them that they have provided to PAM on the basis of a contract or their consent. At the request of the data subject, PAM may also transfer the data concerned to another controller who is able to receive the personal data concerned in a secure manner. In the verification request, the data subject must provide sufficient identification information about him/herself. The request must be submitted signed electronically or in writing to the PAM Union data protection officer.
12. Right to rectification of data	Data subjects may request PAM to rectify and complete inaccurate or incomplete data using a rectification request signed electronically or in writing. In the request, the data subject must provide sufficient identification data about him/herself and describe the data to be rectified. The rectification request must be sent signed electronically or in writing to the PAM Union data protection officer.
13. Right to limitation	Data subjects may request PAM to limit the processing of their personal data in accordance with Article 18 of the EU General Data Protection Regulation. In the request, the data subject must provide sufficient identification information about him/herself and specify the data to be limited. The limitation request must be submitted signed electronically or in writing to the PAM Union data protection officer.

14. Consents and prohibitions on direct marketing (right to object)	Data subjects may provide PAM with consents and prohibitions in relation to direct marketing and research surveys as follows: Consents: • e-mail direct marketing • mobile message direct marketing Prohibitions: • direct marketing by postal address • telephone marketing • survey requests by mail or telephone Information on the use of cookies is provided on PAM's website and consent is asked when accessing the website. Users of the online service can deny the cookies necessary for production of the online service in their browser settings. In that case, however, the functionality of online services cannot be guaranteed. Prohibitions and consents do not apply to member communications that do not include marketing.
15. Retention periods and destruction of personal data	Members' personal data is retained for ten (10) years from the end of membership. Personal data of deceased persons is kept for six (6) years from the date of death. In dispute cases, the retention period of ten (10) years from the end of membership is applied, unless there is an earlier legal obligation to delete any information. For training and event data, event data is deleted when the need for processing and use expires. Retention period for call records: records are kept on the server for one year, after which they are deleted.
16. Register protection principles	PAM ensures the security of personal data through comprehensive technical, physical and administrative safeguards. Personal data may only be processed by authorised persons. Data integrity and reliability are ensured and data is available for its ended purpose when needed. Implementation of data security is ensured from the design of the processing of personal data at all stages of the personal data processing lifecycle, up to the secure destruction of the data. PAM ensures, through comprehensive agreements and guidelines and adequate controls, the secure processing of personal data also by those acting on PAM's behalf.
17. Right of appeal to the supervisory authority	Data subjects have the right to lodge a complaint about processing operations they consider unlawful with the <i>Data Protection Authority</i>. More information on how to exercise the right to appeal at www.tietosuoja.fi.
18. Amendments to the privacy statement	The controller is constantly developing its activities and reserves the right to amend this privacy statement.