

Description of the personnel fund register managed by Innova Services Ltd	
Controller	A personnel fund that has concluded a contract with Innova Services Ltd on the management of personnel fund matters
Management of register	Innova Services Ltd, Anna Ylikorkala, anna.ylikorkala@innova.fi Member service and review requests, tel. +358 10 516 7002
Purpose of processing personal data	The purpose of the processing of personal data is the management of personnel fund operations, related business and customer relationships. Personal data is processed on the basis of data provided by the employer. In addition, personal data is processed for purposes that are linked to fulfilling the statutory obligations of the register holder, such as: - identifying and knowing the registered persons; - managing enquiry and reporting obligations in accordance with legal and official regulations and instructions.
Registered person groups	Person has or has had the following relationship with the register holder: - membership in the personnel fund (customer) managed by Innova Services Ltd - the registering of personal data is based on the statutory obligation of the register holder.
Disclosure of data	On the basis of the personnel fund's service contract, Innova Services Ltd may disclose the register data in circumstances specified by legislation in force at the moment of disclosure, to authorities, for example. The register data may be disclosed to other companies belonging to the same group as Innova Services Ltd in order to perform a service of Innova Services Ltd.
Transfer of personal data outside the EU or the EEA	Data can be transferred outside the European Union (EU) or the European Economic Area (EEA) within the limits set by the Personal Data Act. The register holder shall transfer personal data outside the EU and EEA only to such partners that have guaranteed an adequate level of protection for the data through an agreement or otherwise as required by law. The transferred data is only processed on behalf of the register holder.

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Data groups and data registered for each person group		
Person group	Data group	Data
1	Basic data on personnel fund members	Name Membership number in the fund Personnel number (given by employer) Personal identity code Language Taxation information Employment information Fund's membership information Information on the cause of termination of membership Nationalities and country of residence Required information of taxation countries and Tax Identification Numbers Data required for identifying and knowing the customer Data on use of web services
	Member-specific fund units	Tied up and withdrawable fund units Change in fund units Units paid Bonuses granted Valuation dates Information required for managing member fund units
	Contact information and contact channel	Home address Telephone numbers Email addresses Bank account numbers Contact channels
	Communication	Electronic messages and letters Marketing permissions Reacting to electronic communications Telephone calls Customer feedback
	Customer service control data	Customer managers
	Basic data on the fund	By fund: ID Functionalities according to by-laws Status of the fund Board and contact persons of the fund Date of establishment of the fund Number of members in the fund Information on the fund's capital

	Principles of personal data protection	<ol style="list-style-type: none">1. Access to register data is controlled by means of data rights management to ensure that the data is accessed only by persons with the specific right to do so.2. Persons accessing register data are required by law to maintain the confidentiality of the data, and they have signed an agreement of nondisclosure.3. The register resides in a data network, which is separated from public communications networks by means of firewalls.4. Confidential information transmitted through public communications networks is encrypted electronically.5. Paper documents are stored in facilities with restricted access, and their use is monitored with the use of access rights management.
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