

ORGANIZATIONAL REGISTER

A PRIVACY NOTICE FOR EMPLOYEES AND STAKEHOLDERS

1. CONTROLLER

The data controller under the applicable data protection law is Happi Health (hereinafter also referred to as "we" "us" or "our"). Happi Health is responsible for ensuring that your personal data is processed in accordance with this Notice and applicable data protection laws.

Contact information of the controller: N Health Technology Oy (Happi Health) Business ID: 2966332-6
Address: Eerikinkatu 3 B, 00100 HELSINKI.

Data Protection Officer: Elina Saarenmaa, email: tietosuojaavastaava@terapiatalonoste.fi

2. COLLECTION OF PERSONAL DATA

Your personal data may be collected in different ways. As a general rule, we collect personal data directly from you. To the extent permitted by applicable laws, we may also collect personal data from other sources, such as public authorities, occupational health service providers or other service providers who support us in our day-to-day operations or from whom we otherwise obtain services related to the performance of our job duties, e.g. telephone operators, travel agencies. Our contractual and statutory rights and obligations in relation to employment and fiduciary duties require us to collect and process personal information, such as:

- basic personal data, e.g. name, address, email address, telephone number, date of birth and place, personal identity number, sex and nationality;
- administrative data related to the work, e.g. employee's ID number and user name, work email, phone number and address, photograph;
- information on the employment relationship and qualifications, e.g. job description, job title, start and end date of employment, training completed and in progress, language used and, where applicable, information on aptitude tests;
- details of previous employment, e.g. previous employers, dates and tasks;
- payroll information, e.g. salary, benefits, bank account details, tax rate, and, if applicable, union and church membership;
- leave, attendance and absence data, e.g. hours worked, attendance and absence, annual leave and family leave;
- health information, such as sick leave records, medical certificates and substance abuse test results;
- information on performance and professional development, e.g. appraisal data, individual objectives and disciplinary matters;
- data collected in the course of daily activities and business operations, e.g. data generated in connection with the use of the workstation environment and IT systems and data generated in connection with the use of telecommunication networks and communication tools;
- emergency contact details, e.g. name, address and telephone number.

As mentioned above, we may process sensitive information relating to health, trade union and church membership where it is necessary for the exercise of contractual or statutory rights or obligations in connection with employment or fiduciary duties, to the extent permitted or required by law.

We may also process other personal data voluntarily provided by you during the term of your employment or position of trust. You may also disclose other personal data, but this is not required for the purposes of the employment relationship or position of trust.

3. THE PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

We process personal data to administer human resources and employment matters and to comply with related contractual or legal rights and obligations, such as:

- setting the terms and conditions of employment;
- determining and paying salaries, benefits, allowances and remuneration;
- organising occupational health care or other services necessary for the employment relationship, e.g. travel arrangements;
- monitoring working hours and absences;
- monitoring and managing career development and performance;
- organising, providing and maintaining an appropriate workstation environment, including communication tools and IT systems; and
- compliance with the laws applicable to the employment relationship or position of trust.

The legal basis for the processing of personal data is the employment contract or position of trust between you and Happi Health and the legal obligations that Happi Health is obliged to comply with as an employer or payer of remuneration. We also process personal data to ensure the security of our communication networks and IT systems, to prevent unauthorised access to our premises and to increase the security of our staff. In such cases, the processing of personal data is based on our legitimate interest to ensure an appropriate level of security of our systems and facilities. In certain circumstances and in accordance with applicable laws, we may also process your personal data for other purposes to which you have consented.

4. TRANSFERS AND DISCLOSURES OF PERSONAL DATA

We may disclose personal data to third parties:

- to the extent permitted and required by law, such as tax authorities, insurance companies, pension institutions, occupational health institutions, trade unions, labour inspectorates and other similar authorities;
- when our partners process personal data on our behalf and in accordance with our instructions (e.g. outsourced payroll and accounting services). We will always ensure that your personal data is processed properly;
- when we procure services to provide you with an appropriate workstation environment and equipment (e.g. telephone connections) or other services necessary for your employment (e.g. travel and flight bookings);
- when we believe that disclosure of personal information is necessary to exercise our rights, protect your safety or the safety of others, investigate wrongdoing or respond to a request from a public authority; and
- with your consent, to the parties to whom the consent relates.

5. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU OR ETA

We do not transfer personal data of employees and trustees outside the EU or the European Economic Area.

6. STORAGE OF PERSONAL DATA

Personal data will be kept only for as long as necessary to fulfil the purposes of use specified in this Notice. Your personal data will be kept for the duration of your employment or position of trust. Personal data may be retained to the extent permitted or required by applicable law, where necessary, even after the termination of your employment or position of trust.

Personal data will be deleted when its retention is no longer necessary to fulfil the law or the rights or obligations of either party.

7. RIGHTS OF THE DATA SUBJECT

You have the right to inspect your personal data. You may also request at any time that your personal data be corrected, updated or deleted. Please note, however, that personal data that is necessary for the purposes of this Notice or that is required to be kept by law cannot be deleted. You have the right to object to or restrict the processing of your personal data to the extent required by applicable law. In certain cases, you have the right, under applicable law, to transfer the personal data you provide to us from one system to another, i.e. to receive your personal data in a structured, commonly used, machine-readable format and to transfer your personal data to another controller.

When we process your personal data on the basis of consent, you have the right to withdraw your consent at any time. We will then not process the personal data unless there is another legal basis for the processing. You can exercise your rights by sending a request to us at tietosuojavastaava@terapiatalonoste.fi If you consider that your personal data are not being processed fairly, you have the right to refer the matter to the Data Protection Ombudsman. You can find the contact details of the Data Protection Officer on the Data Protection Officer's website: www.tietosuoja.fi

8. INFORMATION SECURITY

We take appropriate measures (including physical, digital and administrative measures) to protect personal data against loss, destruction, misuse and unauthorised access or disclosure. For example, access to personal data is limited to those persons who need it for the performance of their duties. Please note that even appropriate measures cannot prevent all possible security breaches. In the event of a personal data breach, we will notify you in accordance with applicable laws.

9. AMENDMENT OF THE SUMMARY

We reserve the right to amend this Statement as necessary. We will announce the change on our website.

10. CONTACT US

If you have any questions about this Notice or for more information about the processing of your personal data, please contact us by email at tietosuojavastaava@terapiatalonoste.fi