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Privacy Statement

The Trade Union of Education in Finland, OAJ

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1. Introduction

Updated **24 May 2018**

Your privacy is important to us. The Trade Union of Education in Finland (hereinafter OAJ) is committed to protecting your privacy in the best manner possible and to processing your personal data transparently in compliance with the valid laws and good data protection practice.

This Privacy Statement describes how we collect, process and protect your personal data in all our operations, both during and after your membership.

By “**personal data**” we mean all types of information, either alone or in combination with other information, that can be used to identify you.

“**Sensitive data**” refers to any data that reveals ethnic origin, political opinions, religious or philosophical beliefs or membership in a trade union. Sensitive data also includes, for instance, data concerning a person’s health. OAJ may process your sensitive personal data only in the situations specified below.

By **personal data “processing”**, we mean all operations performed on personal data either by automated means or manually. Personal data processing thus means, for example, the collection, recording and organisation of data.

“**Controller**” refers to the party which, alone or jointly with others, determines the purposes and means of the processing of personal data. OAJ is the controller of its members’ personal data.

“**Joint controller**” means that two or more controllers jointly determine the purposes and means of processing, i.e. why and how personal data is processed. The controllers determine, through an arrangement between them and in a transparent manner, their respective responsibilities for compliance with the obligations under legislation. OAJ acts as a controller jointly with the member associations described in section 13.

2. Purposes of processing personal data

OAJ processes your personal data in accordance with the legitimate activities related to a trade union by virtue of Article 9.2(d) of the European Union's General Data Protection Regulation for the following predefined purposes:

Maintaining a member register. The register containing members' personal data is the primary source of the personal data that is managed by OAJ, and we use the basic data saved therein in connection with other processing purposes. In order to maintain the member register, we process personal data and contact details, as well as membership, professional and employment data.

OAJ maintains a list of members as referred to in the Finnish Associations Act; the list contains each member's full name and address.

Advocacy. The starting point for OAJ's activities is advocating on behalf of teaching staff, improving teachers' status and developing education. In order to carry out this task, OAJ processes, in particular, its members' professional and employment data.

Managing matters related to membership. OAJ processes the personal data it collects in order to maintain membership matters and member relations. Membership matters include payment transaction data.

Arranging member events. OAJ processes its members' personal data in order to arrange and co-ordinate training and other events.

Drawing up surveys, compiling statistics and developing services. In order to support its members and develop its services, OAJ draws up various surveys and compiles statistics, for which purpose it processes the personal data of its members.

Implementing the union's communication. OAJ processes its members' contact details in order to implement internal communication.

Direct marketing. OAJ engages in traditional direct marketing, for which purpose it processes the personal data and contact details of members. For this, OAJ requests separate consent from its members.

3. Personal data we process

In this Privacy Statement, OAJ only addresses the personal data that is necessary for the described purposes. The purpose more clearly defines the member data that is used in each situation.

This data includes data provided by the members or data that is otherwise identifying:

- Personal data, such as name, personal identity code, gender, nationality and language
- Contact details, such as address, phone number and email address, as well as a possible protection order or disclosure prohibition
- Membership details, such as membership number, memberships in OAJ's member organisations, and information about membership benefits, about possible co-membership and unemployment fund membership, about the type of membership, about participation in events and about union positions and positions of trust
- Professional information, such as studying and degree information and special areas of expertise
- Information concerning employment, such as employer, workplace, job title, position, work history and agreement sector
- Information about membership fees, such as membership and union fees, and fee collection authorisation
- Employers' and workplaces' contact persons
- Data from processing enquiries, such as data provided by members themselves, e.g. information about disputes

The processing of data other than members' personal data, for example, the data of shop stewards, is limited to the individuals' contact details and classification information, which are vocational field, education level and field of vocational education and training.

4. Personal data sources

OAJ receives member register data primarily from members themselves, either electronically or by phone. A member association may also update a member's contact details and tasks. Data on shop stewards is obtained from the Negotiation Organisation for Public Sector Professionals JUKO and from members.

Data on occupational safety and health organisations is obtained from members.

Changes of address are obtained periodically as a file transfer from the Finnish postal service company Posti. Members' data that is subject to a disclosure prohibition or an order of protection issued by the local register office (Maistraatti) is not updated as a Posti file transfer, nor is the personal data of persons living abroad.

OAJ may receive the data of a member transferring from another union, subject to the member's authorisation.

5. Sensitive personal data

Special personal data groups, i.e. so-called "sensitive personal data" refers to personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or membership in a trade union, as well as genetic and biometric data or data concerning the health status, sex life or sexual orientation of a natural person.

The processing of trade union membership is permitted only in connection with the legal operations of a foundation, association or other non-profit organisation pertaining to trade union operations. The processing may only concern current and former members. The processing of other sensitive data is only permitted if such processing is necessary for the purposes of carrying out obligations in the field of labour law, social security or social protection, or with the member's explicit consent. OAJ only processes membership data pertaining to OAJ's current and former trade union members.

6. Disclosure and transfer of data

OAJ can disclose your personal data to third parties if you have given your consent to such disclosure. OAJ processes your personal data confidentially and does not disclose it to third parties except in the following cases:

- To OAJ's member associations that you belong to and which act as joint controllers with OAJ in order to manage membership matters
- To shop stewards and occupational safety and health representatives for advocacy purposes
- To insurance companies and the unemployment fund for implementing membership benefits

In the processing of your personal data, we also use subcontractors and service providers (e.g. for technical maintenance), who have the right to process your data only to the extent required to carry out the agreed services. This means that they cannot use your personal data for their own purposes. We place contractual obligations on them to ensure an adequate level of data protection and the lawfulness of processing.

We transfer personal data to the following third parties:

- OAJ's member associations
- employers
- shop stewards, occupational safety and health representatives
- technical maintenance service providers
- JUKO
- Akava
- communication service providers
- service providers of membership-based benefits
- Posti
- banks
- authorities
- event organisers

The data we collect is processed partly outside the European Economic Area, for example, if a service provider of ours is located or stores data outside the EEA. Transfers are based on the European Commission's standard contractual clauses or on the Privacy Shield system.

The service providers we use have contractually committed to ensuring that an adequate level of data protection is guaranteed in all processing of your personal data.

7. Data security

We have the appropriate technical and organisational measures in place to protect personal data against destruction, misuse or other similar unlawful access. Such measures include the use of firewalls, encryption techniques and secure IT facilities.

Access to your personal data is also internally restricted through access control and the granting and monitoring of user rights. Your personal data is processed only by employees who have the right to access your personal data in order to carry out their work tasks.

8. Access to data and exercising rights

You have the right to access data pertaining to you that we have collected in our registers and to influence how we use that data. You can decide whether you wish to receive direct marketing, and in certain cases you have the right to be forgotten or to request the transfer of your data to another controller. The legislation in effect guarantees you, for example, the following rights:

- **Right to withdraw consent**
If the processing of personal data is based on your consent, you have the right to withdraw your consent at any time.
- **Right of access and right to rectification**
You have the right to access, at any time, the data we have collected on you, or to receive assurance that our register does not contain personal data pertaining to you. If your data is incorrect, inaccurate or incomplete, you can request that we rectify or supplement your data.
- **Restriction of processing and right to object**
If some parts of your data is inaccurate, you have the right to demand that processing be restricted until we have verified the accuracy of the data. In certain cases, you also have the right to wholly object to the processing of your personal data.
- **Right to prohibit direct marketing**
You can also prohibit direct marketing at any time (including profiling for direct marketing purposes).
- **Right to be forgotten**
In certain cases, you have the right to be forgotten. We will erase all data we have collected on you if the personal data is no longer needed for the purposes for which it was originally collected. We will also erase data if the personal data processing was based on consent and you withdraw your consent, or if you object to your personal data being processed, unless other grounds exist for the processing.
- **Right to data portability from one system to another**
You can request the transfer of your personal data, in which case we will deliver your personal data to you in machine-readable format. You can store the data yourself or transfer it to another controller (e.g. to another service provider). This only concerns information that you have submitted to us yourself.
- **Right to appeal**
In addition to the above-mentioned rights, you have the right to lodge a complaint with the supervisory authority concerning the processing of your personal data.

You can submit a request to exercise these rights in an enquiry form, which you can find on the Contacts page, yhteydenotto.oaj.fi

9. Storing data

We retain your data only for as long as is necessary for the purposes stated above and always within the limits laid down in the valid legislation, such as in the Finnish Accounting Act.

Data on a member who has left the organisation or who was dismissed from the organisation is stored in accordance with imperative legislation and separate archiving practices, but it is not maintained or transferred onward.

When there is no legal need to store the data, it is either destroyed or made unidentifiable by irreversibly modifying it into a format that makes identification of the individual impossible.

10. Use of cookies

We may collect data concerning your computer through the use of cookies and similar techniques. Cookies are small text files that the browser saves on your device. Cookies contain a unique identifier and are used to identify and count the browsers that visit our websites. You have the right to block the use of cookies, but this may affect the functionality of our services. You can clear cookies in your browser settings.

You can learn more about website analyses and the use of cookies and how to block them by reading our cookies practices [here](#).

11. Changes to the Privacy Statement

We continuously develop our data protection practices, for which reason we may change this Privacy Statement from time to time. The changes may also be based on a change in legislation. We recommend that you visit our Privacy Statement page again periodically to see if any changes have been made. If necessary, we may also notify you directly of any changes.

12. Controller and contact details

OAJ is the controller of your personal data. If you have any questions or comments, please contact us:

The Trade Union of Education in Finland, OAJ
Kellosilta 7
00520 Helsinki
Data Protection Officer Karoliina Huuskonen, karoliina.huuskonen@oaj.fi

13. Joint controller

The OAJ member associations listed below are joint controllers with OAJ and may also process your personal data if you are a member of the association in question. Joint controllers process your personal data for the purpose of maintaining the member register, advocating on behalf members, managing matters related to membership, arranging member events, drawing up surveys, compiling statistics, developing services and carrying out the organisation's communication.

Early Childhood Education Teacher's Union of Finland (ECE Teachers Union)
Rautatieläisenkatu 6
00520 Helsinki

Helsinki Teachers' Union HOAY
Rautatieläisenkatu 6
00520 Helsinki

TOOL ry
Rautatieläisenkatu 6
00520 Helsinki

Union of Teachers in Business Colleges and Polytechnics in Finland
Rautatieläisenkatu 6
00520 Helsinki

Teacher Student Union of Finland (SOOL)
Rautatieläisenkatu 6
00520 Helsinki

Retired Teachers in Finland (OSJ)
Rautatieläisenkatu 6
00520 Helsinki