

EU 2019/1937)

Directive on the protection of persons who report breaches of Union law

Updated: 27.9.2021

Data file holder	Tampereen Särkänniemi Oy Laiturikatu 1 33230 Tampere Business ID: 0155085-6
1. Person responsible for matters related to the personal data file	Tuula Salminen Data Protection Officer 0207 130 381 Laiturikatu 1 33230 Tampere
2. Name of the data file	Tampereen Särkänniemi Oy's Personal data file of the notification channel
3. Purpose of the processing of personal data / purpose of the data file	The handling of the data is related to the administration of the whistleblowing notification channel offered by Central Chamber of Commerce. Särkänniemi offers a reliable notification channel that enables reports of abuse and unethical activities. The processing of personal data is necessary in order to fulfill the obligations imposed by the directive.
4. Information content of the data file	Notification does not require handing out personal data of the notifier. The notification is made anonymously, unless the notifier explicitly provides personal data. (No personal data is collected from notifiers, but notifiers may themselves include their own or another persons data as part of the written notification or through metadata of attachments). The first and last names, e-mail address, public name, and user name of the notification handlers.
5. Handling criteria	Processing of personal data is based on the data file holders legal obligation (EU 2019/1937) for third parties and the legitimate interest of the data file holder or the third party and of the notifiers consent and the legitimate interest of the data file holder or a third party. Personal data is processed to process whistleblowing notifications. The notifications shall also be used by the data file holder to take the necessary actions. These obligations follow directly from the directive. The data of the data file holder's notifications processors are processed for the measures necessary for the access control of the Central Chamber of Commerce's notification channel. The processing is based on the implementation of the contractual obligations between the data controller of the agreement and the processor of personal data on the use of the notification channel service.

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6. Regular sources of information	sarkanniemi.ilmoituskanava.fi, entries submitted by people.
7. Regular data transfers and data transfers outside the EU or the European Economic Area (EEA)	Personal data will not be processed outside the EU or the EEA. Only a limited number of people have access to the personal data. People processing personal data related to the notification channel service are subject to appropriate professional secrecy.
8. Administration systems and security principles of the data file	<ul style="list-style-type: none"> A. Manual material <ul style="list-style-type: none"> - No manual material B. Electronic material <ul style="list-style-type: none"> - Notification data is stored in the notification channel database encrypted - The notification channel provider does not have access to the stored data but they are used only by the data handlers designated by the data file handler - The subscriber data and processor data of the service are stored in the CRM systems of the notification channel service provider
9. Inspection right and the implementation of the right of inspection	The data subject shall have an access to their own data, except where the restriction of access is based on the need to protect the necessary right of the third party. In example when the access to the information would result in the identity of the notifier being at risk.
10. Data correction and the implementation of data correction	The data subject also has the possibility to request the correction or deletion of their own data from the service. It is also possible to restrict this right of the data subject if the purpose of the restriction is to safeguard the data file holder's legal obligation, in particular the obligation to provide reliable and impartial notification channel.
11. Deletion of data	The material is stored in the service provider's system for a limited period of time for a maximum of two years and the data file holder will delete the data securely after the processing of personal data is no longer necessary.
12. Other possible rights	

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