Spring House Oy Individual Job Coaching Date of creation or amendment: May 2020



DATA PROTECTION NOTICE / INFORMATION DOCUMENT EU'S GENERAL DATA PROTECTION REGULATION, 2016/679

Summary

This summary explains how Spring House processes the personal data of the customers of Individual Job Coaching. Detailed information on processing measures can be found in the Privacy Notice below.

On what grounds do we process your personal data?

Spring House processes your personal data based on your participation in Job Search Coaching that Spring House Oy is providing for TE Office. Therefore you have a contractual relationship with TE-Office.

What information do we collect on you?

We only collect information that is necessary from the perspective of coaching, such as name, contact details, place of the appointment or a way of organizing the appointment. We do not process your information for any other purpose.

Where do we obtain your information?

In general, the personal data that we have has been received from you during coaching or when you have booked an appointment with us.

We process your information only as long as is needed and as required by law and then remove the data from our databases.

Who do we disclose your information to?

We disclose your information only if necessary and as needed to TE Offices. We can also disclose your data to the authorities if this is required by law. We have made statutory agreements with all parties to whom your data can be disclosed for a valid reason and your data is always kept confidential.

How do we protect your data?

We process personal data with methods and systems where the processing of your personal data is protected in the best possible way. We have restricted access to your data with authorisation and appropriate technical protections. Our staff who take part in processing your data comply with obligation to secrecy and protect your privacy by all means.



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1. Controller

Centre for Economic Development, Transport and the Environment / TE Offices

2. Data Processor

Spring House Oy, Business ID: 1786915-9 Ruoholahdenkatu 14, 00180 Helsinki

3. Data Processor's Privacy Officer

Switchboard: 030 047 2000 Email: <u>tietosuoja@staffpoint.fi</u>

4. Legal grounds for and purpose of processing personal data

The purpose of personal data processing is to produce Job Search Coaching services for the customers of the TE Office. The purpose of the service is to help the target group customers with questions about job or education search, and how to take advantage of the services the TE Office has targeted to their job-seeking customers.

Spring House is the service provider based on the contractual relationship between the Controller and the Processor. The Service is provided in the TE-Offices premises by meeting the Customer personally. However, the service can also be provided through electronic channels. When using the electronic channels, the Customer will make an appointment for the meeting electronically, in which case the meeting will be arranged either by telephone or by video conference.

5. Groups of data subjects

TE Office's customers

6. Content of the personal data file - personal data groups

- Individual's identification data: Name, telephone number, email address, time of the appointment, place of the appointment or a way of organizing the appointment
- Other possible service-related information given by the customer

7. The recipients or categories of recipients of the personal data

- The personal data entered in the service is disclosed in the manner required and permitted by valid legislation to the authorities that have a statutory right to receive data and also to the buyer of the service based on the contract.
- Personal data is processed on Spring House's behalf by subcontractors. The subcontractors supply systems and services to Spring House. Spring House has made appropriate agreements on processing personal data with the subcontractors, in which they undertake to comply with the agreement terms, with a secrecy obligation and high level of data security.

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8. Transfer of data to countries outside the European Union or the European Economic Area

Personal data processed in the service is not disclosed or transferred to countries outside the European Union or the European Economic Area.

9. Storage period of personal data

Spring House stores the personal data collected during the service until the end of the contractual data retention obligations. When the retention period has ended, Spring House will appropriately destroy or return to Controller all data associated with the data subject irrespective of the storage format.

10. Rights of the data subject and exercising them

In matters related to using the rights of the data subject, the data subject must contact Controller (TE-Office)

According to the General Data Protection Regulation (GDPR) articles 15 to 22 data subjects have the right:

- a. Right of access to data right of inspection
- b. Right to rectify, erasure and restriction of processing
- c. Right to object to processing
- **d.** Right to data portability
- e. The right to lodge a complaint with a supervisory authority

12. Data sources, regular data sources

Personal data is collected from the TE-Office and the Customer.

13. Principles of personal data protection

Spring House will ensure data security and implement technical and organisational measures in accordance with legislation and general high standards to protect personal data from unauthorised or unlawful processing.

Only those employees of Spring House can access the personal data who have the right to use this information and are entitled to do so as part of their work. In order to process personal data, the user will need a personal user ID and password at least.

Personal data stored is collected in databases that are protected by firewalls and other appropriate technical methods.

Spring House is responsible for ensuring that employees' personal data is stored in a place where unauthorised people are unable to access it.

The employees of Spring House have been given separate guidelines on the careful processing and storage of personal data. Persons authorised to process personal data shall undertake to comply with a secrecy obligation.