

## PRIVACY POLICY

Processing of personal data of employees, management and shareholders of Go On Finland companies

### WHO PROCESSES YOUR DATA?

[Contact information](#)

### WHO CAN YOU CONTACT WITH QUESTIONS ABOUT DATA PROTECTION?

If you have questions about data protection or want to exercise your rights, you can contact:

[Contact information](#)

### WHAT PERSONAL DATA DO WE PROCESS?

If you are an employee or a member of our management team, we process the following data about you

#### **Your basic information**, such as

- Name
- Social security number
- Home address, email address, phone number
- Bank information

Providing us with the above-mentioned basic information is necessary in order to enter into an employment or service contract.

#### **Information related to your employment or service relationship**, such as

- Close relatives and their contact information
- Start and end date of employment or service
- Employment contract or service contract; grounds for fixed-term employment
- Salary and benefits · Content and title of duties
- Work permits, residence permits (if required by law)
- Class of driving licence if your work requires a driving licence
- Information related to taxes and employer payments
- Travel invoices and kilometre allowances
- Photograph
- Information and certificates related to the termination of employment
- Membership in a trade union (if membership is paid from salary)
- Church membership (if deduction from salary is made from salary)
- Security clearance if you are in a position where this clarification is required for the performance of your duties

**for development at work and information related to the monitoring of your working time, such as**

- Your working time (if you are covered by working time monitoring)
- Degrees, qualifications and information related to training
- Information related to goals and development discussions
- Information related to evaluations and log data related to the assessment tool
- Language skills, aptitude tests and recommendations
- Employment history with the controller
- Sick leave, annual leave, parental leave and childcare leave, as well as any other agreed absences (including study and rotation leave)
- Medical certificates or statements or other information about your state of health or work ability, insofar as legislation allows the processing of such information
- Occupational accidents
- Disciplinary measures
- Information related to access control

**Information related to your tools, such as**

- Access rights granted to you and user IDs and passwords to our electronic systems

If you are our shareholder, we process basic information about you mentioned above as well as the following information:

- owned shares
- information on acquisition of shares
- statement on payment of transfer tax
- information on dividends paid
- information on participation in general meetings

We process the following information about our shareholder's representative

- name
- position in shareholder's organisation
- information about participation IN general meetings

**FOR WHAT PURPOSES AND ON WHAT BASIS DO WE PROCESS YOUR PERSONAL DATA?**

We process your personal data for the purposes of managing your employment and employment relationship, such as preparing your employment or services contract, paying your salary or remuneration and our other obligations, such as organising occupational health care, monitoring working time, absenteeism and performance of work tasks, training, general human resources development, safety at work and day-to-day management measures.

Information related to the shareholdings is processed to deal with matters related to shareholdings.

The processing of your personal information is mainly based on the preparation, conclusion and implementation of your employment contract or on compliance with our legal obligation. We process information to comply with a legal obligation, for example when we process your personal data to provide statutory occupational health care and to pay withholding taxes and social security

payments. The processing of shareholding data is also based on our legal obligation to maintain a register of shareholders and to make arrangements for general meetings and withholding taxes.

We may also process your personal data on the basis of our legitimate interests based on employment or business relationship.

Your personal data may also be processed on the basis of consent to the extent required by law, for example, for personal and suitability assessments.

Companies belonging to the same group as Go On Finland Oy, as well as independent franchisees belonging to the Go On Finland chain, are joint data controllers and, therefore, may use personal data for customer communication and marketing purposes. Furthermore, we may use your personal data for the planning and implementation of the business of the data controller and companies belonging to the same group or economic association as the data controller, including for controlling the activities of independent franchisees belonging to the Go On Finland chain.

## **FROM WHERE DO WE COLLECT YOUR PERSONAL DATA?**

We collect your personal data primarily from you. We may also collect information from systems that store information about our employees' activities.

Your information may also be collected from your referrer.

With your consent, we may also collect personal data from other sources, unless it is personal credit information to determine your reliability, in which case consent is not required.

## **TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?**

We will disclose your personal data if required by Finnish law or the authorities.

If you are an employee of ours, we regularly disclose your data to the tax authorities, Kela, pension insurance company, insurance companies, occupational health care service provider. In addition, we may disclose your personal data to our customers where appropriate and necessary to the customers for whom the employee works.

We have outsourced the processing of your personal data to the following service providers that process your personal data for us:

- To suppliers of HR administration IT systems
- To other IT system suppliers
- To a payroll accounting firm

## **DO WE TRANSFER YOUR PERSONAL DATA TO A THIRD COUNTRY?**

We do not transfer your personal data outside the EU or the EEA.

## HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We keep your personal data for as long as is necessary for the purposes of the processing of your personal data or in order to comply with our legal obligations. The retention periods take into account, for example, the statute of limitations allowed by legislation, as well as our obligations as an employer.

We keep payroll records for 10 years from the end of the financial period.

Information related to working time records are stored for 2 years from the end of the calendar year during which the right to compensation under the Working Hours Act has arisen or during which the leave should have been granted.

Information related to annual leave records are stored for 2 years from the end of the calendar year during which the annual leave should have been granted or the holiday compensation paid.

If you are an employee of ours, we keep the data necessary for the issuance of your employment certificate for 10 years from the end of the employment relationship. As a rule, we keep other data collected during your employment relationship for the duration of the employment relationship and 2 years from the end of the employment relationship.

If you are a board member, Managing Director or shareholder, we generally keep your data for 10 years from the end of the employment or partnership.

## WHAT RIGHTS DO YOU HAVE?

In order to exercise your rights, you can contact [Contact information](#).

### Right to access

You have the right to receive confirmation from us whether we process personal data about you. Furthermore, you have the right to access personal data concerning you, as well as information on the processing of your personal data in accordance with the Data Protection Regulation.

When you exercise your right to access, we will provide you with a copy of the personal data we process about you. If you request more than one copy, we may charge a reasonable fee based on administrative costs.

### Right to rectification

You have the right to ask us to rectify inaccurate and incorrect information without undue delay. Furthermore, you have the right to have incomplete personal data completed by providing us with further clarification.

## Right to erasure

You have the right to obtain from us the erasure of personal data concerning you without undue delay if:

- your personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- you withdraw the consent on which the processing is based and there is no other legal basis for the processing of such data;
- you object to the processing of your personal data on grounds relating to your personal particular situation and there are no legitimate grounds for the processing;
- we have unlawfully processed personal data; or
- personal data must be erased in order to comply with a legal obligation to which we are subject.

## Right to restriction of processing

You have the right to have our processing of your personal data restricted in such a way that, in addition to storage, your personal data may only be processed with your consent or for the establishment, exercise or defence of legal claims or the protection of the rights of another person if:

- you contest the accuracy of your personal data, in which case we restrict the processing for the duration of the verification of the accuracy of the data;
- we process your personal data unlawfully, and you object to the erasure of your personal data and instead request the restriction of the use of your personal data;
- we no longer need your personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims; or
- you have objected to the processing of your personal data on grounds relating to your personal particular situation and are waiting to establish whether our legitimate grounds override those of your opposition.

## Right to data portability

You have the right to receive the personal data you provide to us in a structured, commonly used and machine-readable format and the right to transfer such data to another controller if:

- we carry out the processing automatically; and
- the processing is based either on your consent or necessary for the performance of a contract between us or for taking pre-contractual measures at your request.

The right to transfer data from one system to another is limited to a procedure that does not adversely affect the rights or freedoms of others.

**The right to object to the processing of personal data**

You have the right to object to the processing of personal data carried out by us on the basis of our legitimate interest on grounds related to your personal special situation.

**RIGHT TO WITHDRAW CONSENT**

You have the right to withdraw your consent to the processing of your personal data at any time. The withdrawal of consent does not affect the lawfulness of the processing carried out by us on the basis of your consent before its withdrawal.

**RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY**

You have the right to lodge a complaint with the Data Protection Authority if you consider that your rights under the Data Protection Regulation have been violated in the processing of personal data. In Finland, the supervisory authority is the Data Protection Authority (<https://tietosuoja.fi/en/home>).

**HOW DO WE ENSURE DATA SECURITY IN THE PROCESSING OF YOUR PERSONAL DATA?**

The use of systems containing personal data is protected by user-specific IDs, passwords and access rights.

Our manually maintained data are located in premises that are inaccessible to unauthorised persons.

Only those persons who need to process your personal data in order to perform their duties have access to your personal data processed by us.

We use Withsecure EPP antivirus software.