



29 June 2018

Unrestricted

Record of processing activities

This Privacy Statement has been published on the Bank of Finland's website www.suomenpankki.fi/data-protection/ .
1. Name of the personal data file system
Pensions personal data file system
2. Name and contact details of controller and contact details of data protection officer
<p>Bank of Finland (in respect of Bank of Finland's data collections) Business ID 0202248-1 PO Box 160 00101 Helsinki</p> <p>Contact details of the person responsible for the personal data file system: Eija Brusila Email: legal(at)bof.fi Tel. 358 9 1831 (switchboard)</p> <p>Contact details of the data protection officer: Pasi Hänninen Email: tietosuojaavastaava(at)bof.fi Tel. +358 9 1831 (switchboard)</p>
3. Purpose of the processing of personal data and the legal basis for the processing
<p>Processing is necessary to comply with the statutory obligation of the controller. Pursuant to section 58 of the Act on the Employees of the Bank of Finland (1166/1998), an employee has the right to a pension and a family pension payable from the Bank of Finland's resources.</p> <p>The Bank of Finland has outsourced the following service package related to the administration of pensions to Mandatum Life Palvelut Oy, which has outsourced some of the duties to Varma Mutual Pension Insurance Company:</p> <ul style="list-style-type: none">• advance service• application service and calculation service• payment service• personal data file service• working capacity assessment service• rehabilitation evaluation service



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- employer services

The privacy statements on personal data processing of Mandatum Life Palvelut Oy and Varma can be found via the following links:

- <https://english.mandatumlife.fi/dataprotection>
- <https://www.varma.fi/en/other/Processing-of-your-personal-data-at-Varma/rekisteriselosteet/pensioner-or-rehabilittee/>

4. Categories of data subjects and categories of personal data

Categories of data subjects:

- Persons who have retired from the Bank of Finland or recipients of a family pension after a bank employee.

Categories of personal data:

- Pensioners' personal and address information, pension date and payment information, and decisions issued.

5. Recipients or categories of recipients of the personal data

The Bank of Finland discloses personal data to parties that have the right to receive the data for a purpose prescribed in law.

The Bank of Finland discloses personal data to Mandatum Life Palvelut Oy, Varma Mutual Pension Insurance Company and Arek, the earnings-related pension system's joint earnings register, based on a service agreement made with Mandatum Life Palvelut Oy. These parties use subcontractors in processing and storing data.

6. Notification of possible transfer of personal data to a third country or an international organisation

Mandatum Life Palvelut Oy, Varma Mutual Pension Insurance Company and Arek, the earnings-related pension system's joint earnings register, or their subcontractors may transfer personal data outside the EU or the EEA. In such cases, the transfer must be made to a country where the European Commission has confirmed that an adequate level of data protection is ensured or an adequate level of personal data protection is provided in the manner required by data protection legislation, e.g. using standard contractual clauses approved by the European Commission.

7. Period for which the personal data will be stored or the criteria used to determine that period

Personal data are stored permanently in accordance with the Bank of Finland's information management plan, confirmed by the National Archives.



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8. General description of technical and organisational security measures

In order to protect personal data against unauthorised access, disclosure, destruction or other unlawful processing, appropriate technical and organisational security measures are used, taking potential risks into consideration. These measures include the use of secure equipment premises as well as administrative and technical information security solutions.

9. Rights of data subjects

The data subjects in the personal data file system have the right:

- to request from the controller access to personal data concerning them and the right to request that such data be rectified.
- to lodge a complaint about the processing of personal data with a supervisory authority.

10. Statutory or contractual requirement to provide data and consequences of failure to provide such data

Provision of data subjects' data is a prerequisite for the processing and payment of pensions.

11. Source of information

The earnings data on which pensions are based are received from Arek, the earnings-related pension system's joint earnings register.