

Privacy statement

This privacy statement indicates that we process the personal data of our insured persons. To ensure the availability of up-to-date and accurate information, we have the right to amend this statement. The last update to the statement was made on 2 April 2024.

Data controller

Enerkemi Insurance Fund

Contact information: Keilalahdentie 2-4, Espoo Tel. +358 10 452 5100, <u>enerkemi@fortum.com</u>

Data protection officer: Soile Rautelin, enerkemi@fortum.com

Collection of personal data

We collect your personal data for Enerkemi in various ways. As a rule, your personal data is collected from you: from your application for insurance, from the notifications you have submitted, and from the information you have provided in compensation applications.

We receive information from your employer about insurance premiums collected, unpaid absences, layoffs, participation in strikes / work stoppages and termination of employment.

Contract partners, such as health clinics and pharmacies, provide the fund with information about the reasons and times of transactions, as well as costs.

For example, we collect and process the following categories of personal data:

- Basic information (name, personal identity code, address, email, phone number, language, account number)
- Information related to the insurance relationship
- Employer information (employer's name, start and end dates of employment)
- Records related to the insured person's enquiries
- Start and end date of using electronic services
- Compensation applications with attachments (attachments may contain health data)
- Compensation decision and payment information

Purpose of and legal basis for processing personal data

The purpose of processing data is the processing and payment of additional benefits in accordance with the rules of Enerkemi, as well as statistics and reporting, insurance

relationship management and customer service. The basis for processing data is your express consent and the fulfilment of legal obligations (Public Insurance Funds Act, Health Insurance Act and Accounting Act).

Disclosure and processors of personal data

Enerkemi also processes its insured persons' benefits under the Health Insurance Act. Your personal data will be disclosed to Kela, for example, after you have become insured by the fund and at the end of your insurance relationship. Applications concerning Kela benefits submitted by you to Enerkemi are also stored in Kela's systems.

Enerkemi's personnel process personal data in connection with their duties to the extent required by those duties.

The data may also be processed by external service providers. For example, software administrators have the right to access the program database under supervision to make any necessary corrections and updates. The processing is based on a mutually binding agreement and data protection commitments. Ownership of the data is not transferred from the controller to a third party, and the third party does not have the right to use the data beyond the assignment.

Protection of registers

The data in the register is stored in information systems that use both technical and programming means to ensure information security. The servers are located within the EU.

We regularly review and update our security policies to ensure that our systems are safe and secure.

Personal data storage period

Your data will be stored for as long as it is needed for the purpose for which it was collected and processed, or as required by laws and regulations. For reasons other than those related to the insurance relationship and compensation in accordance with the rules, the data is also stored for the time required by law for the fund's accounting. The material is disposed of with due regard for data protection.

The data subject's rights

As a data subject, you have the right to:

- Access your personal data in the register
- Demand correction of incorrect and incomplete data unless restricted by law
- Request the deletion of your data in the following cases:

- Withdraw consent to the processing of data to the extent that there is no other legitimate reason for the processing
- Object to the processing of data, and there is no acceptable reason for the processing to continue, or the processing of the data is unlawful.
- Request the transfer of your data from one system to another if it is secure and technically feasible

It should be noted, however, that in many cases the fund is obligated to store personal data for the duration of the insurance relationship and even afterwards if the processing of the data is necessary, for example, to ensure compliance with legal obligations (e.g. the Accounting Act).

If you wish to exercise the rights listed above, the request must be made in writing to Enerkemi. As a rule, Enerkemi provides the information within one month of the request, but no later than within three months of the request.

If you think that the processing of your data has violated the General Data Protection Regulation, you have the right to file a complaint and contact the data protection authorities. More information about filing a notification can be found on the Data Protection Ombudsman's website: <u>Notification to the Data Protection Ombudsman | Office of the Data</u> <u>Protection Ombudsman</u>.